

Wellington College



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Child-on-Child Abuse Policy (including anti-bullying and sexual misconduct)

Introduction

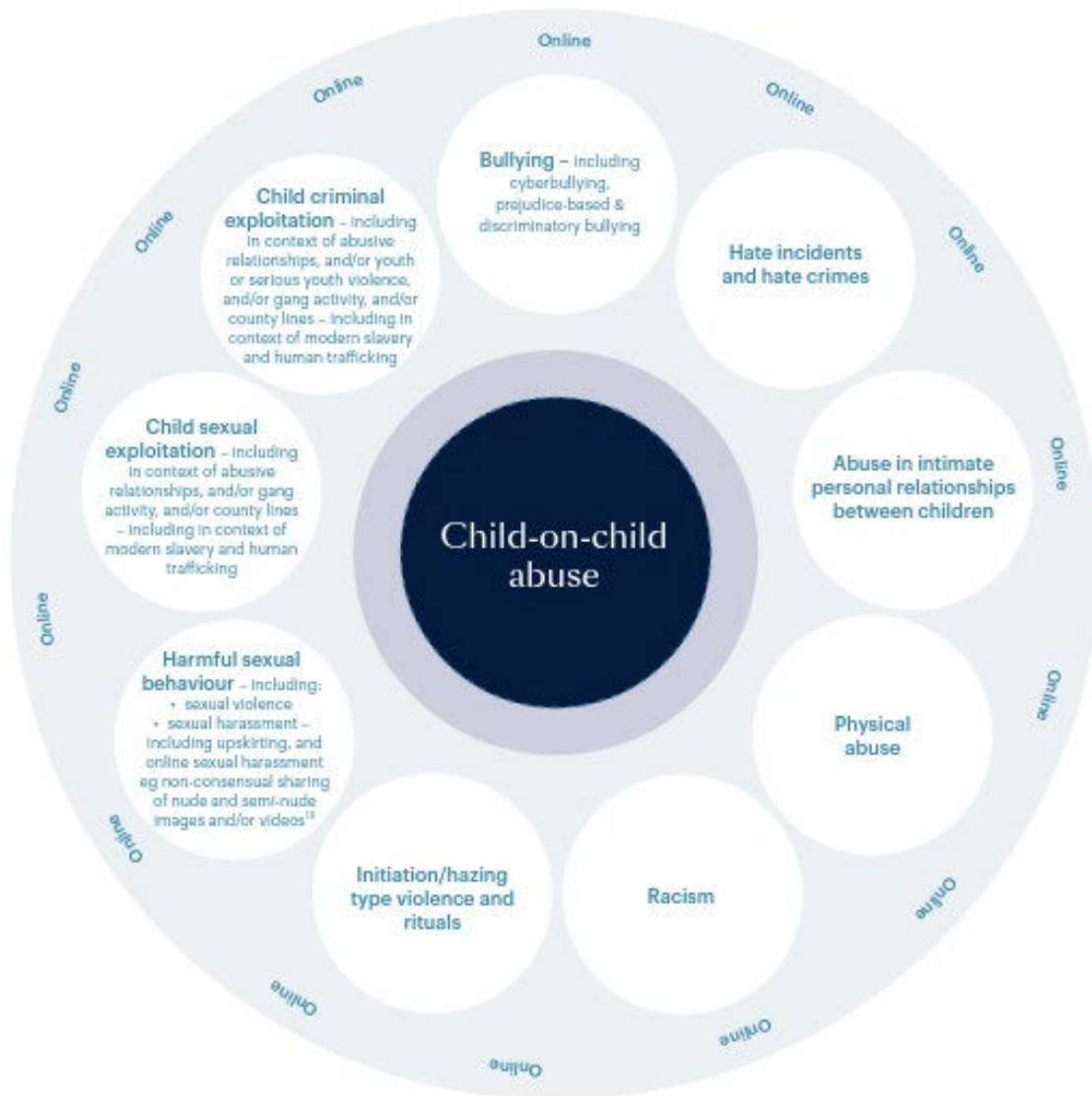
This policy should be read in conjunction with the following College policies:

- Safeguarding and Child Protection policy
- Behaviour Management policy
- Online Safety policy
- Relationships and Sex Education policy
- Investigations policy
- Safeguarding Risk Management policy

Copies of these policies can be found on the College website (link below), MyDay and the Parent Portal. <https://www.wellingtoncollege.org.uk/about/policies/>.

The Wellington College community is based upon the College Values of kindness, courage, integrity, responsibility and respect. We are committed to providing a safe and caring environment that is free from any form of child-on-child abuse so that every one of our students can develop to their full potential. All students should care for and support each other, inside and outside of College. The College also takes very seriously the prevention and early identification and appropriate management of incidents of sexual violence and sexual harassment between students. The College recognises that child-on-child abuse is preventable and that timely, evidence-informed intervention can prevent harmful behaviour from escalating.

An overview of Child-on-child abuse can be seen below:



¹⁸ Farrer & Co. (2022, September). *Addressing child-on-child abuse: A resource for schools and colleges*. Farrer & Co Safeguarding Unit

To protect all of our students, all members of the College community should:

- Be aware of the level and nature of risks to which our students are or may be exposed and put in place a clear and comprehensive safeguarding strategy that is tailored to our specific context, particularly recognising the unique dynamics of a boarding school setting.
- Take a contextual, whole-school approach to preventing and responding to all forms of child-on-child abuse, including sexual violence and sexual harassment, understanding that such behaviour is never acceptable, will never be tolerated, and must not be dismissed as “banter,” “part of growing up”, “having a laugh,” “boys being boys” or any similar expressions that seek to normalise or minimise inappropriate behaviour.
- Understand that inappropriate behaviours between children - particularly those of a sexual nature - may be driven by wider societal influences and that it is essential to proactively challenge and address them within the culture of the school. This includes confronting physical behaviours that may be criminal in nature, such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras, or lifting up skirts, as failing to act risks normalising such behaviours.
- Recognise that sexual violence and harassment, as well as other forms of child-on-child abuse, can occur between any children, regardless of age or sex, and may also involve groups targeting individuals or other groups. Such incidents can happen both in and out of College and may occur online as well as in person.
- Acknowledge that, even if specific incidents are not being reported, it should not be assumed that they are not happening. All staff must remain alert to signs and symptoms of abuse and be proactive in reporting any concerns to the DSL or a deputy, recognising that students may be reluctant to disclose abuse for a range of reasons. Recognise that staff should remain alert to occasions when students may be at greater risk during the school day, including immediately after school, during transitions, in boarding accommodation, online and in less supervised areas of the College.
- Understand that boys are statistically more likely to engage in incidents of sexual harassment or violence, and that certain power imbalances - based on age, social dynamics, or developmental stage - may contribute to patterns of abusive behaviour.
- Regard the introduction of this guidance as a preventative measure, and not merely a framework for reacting to reported incidents. The College is committed to early identification, appropriate intervention, and cultural change, rather than relying on a reactive approach. Recognise that early, evidence-based support is an important safeguarding intervention for children displaying concerning, abusive or harmful behaviours and may prevent escalation into more serious abuse.

- Recognise the national and increasing concern about child-on-child abuse and sexual violence in educational settings and implement this policy to ensure the highest standard of safeguarding is maintained - one in which students are safe, listened to, and supported, and all disclosures are taken seriously.
- Encourage parents to hold the College to account. If their child feels unsafe due to the behaviour of another student, they should feel confident in informing the College, so that appropriate and prompt action can be taken.

The College recognises that prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, can have a significant impact on a child's welfare, wellbeing, mental health and sense of safety. Such concerns will be addressed through the appropriate pastoral and safeguarding processes where appropriate.

This policy sets out our strategy for preventing, identifying, and appropriately managing child-on-child abuse, including allegations of sexual violence and/or harassment between students and will be reviewed annually to ensure that it continually addresses the risks to which our students are or may be exposed.

Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of others. Therefore, the College takes a safeguarding approach to all individuals involved in allegations of, or concerns about child-on-child abuse, including those who are alleged to have been abused and those who are alleged to have abused another child, looking to support all of those involved whilst also considering whether any disciplinary sanctions should be imposed. This policy deliberately does not use the term 'victim' and/or 'perpetrator'². In order to manage cases effectively, the College has designated members of staff named '*Student Wellbeing Mentors*' (SWiMs) to support both those who have suffered harm and those who have caused harm. Further information about the role of SWiMs can be found in Appendix A. This reflects the College's safeguarding approach that both the child who has experienced harm and the child displaying harmful behaviour may require safeguarding assessment, protection and support.

Although the starting point is that the College's response to child-on-child abuse should be the same for all students regardless of age, there may be some additional considerations in relation to a student aged 18 or over in terms of how local agencies and/or partners respond.

² Whilst KCSIE uses the terms "victim" and "alleged perpetrator", the College will use language that is most appropriate for the child and the circumstances of the case, recognising that not every child wishes to identify with those terms.

Similarly, the College's response to incidents involving the exchange of nudes and semi-nudes will need to differ depending on the age of the students involved (see information on image sharing).

Wellington College has a statutory duty to safeguard and promote the welfare of all students. Due regard is paid to all statutory regulations and guidance as set out in Keeping Children Safe in Education, Working Together to Safeguard Children, as well as the Equality Act 2010 and the Human Rights Act 1998, and compliance with the Public Sector Equality Duty. We will also co-operate with safeguarding partnerships once designated as relevant agencies and have a behaviour policy and measures in place to prevent all forms of bullying (including cyberbullying, prejudice-based and discriminatory bullying).

We will also comply with relevant requirements as set out in the Equality Act 2010 (the Equality Act) and the Public Sector Equality Duty (PSED). The Farrer & Co 'Addressing child-on-child abuse: a resource for schools and colleges has also been used for reference³ when writing this policy.

Definitions and Scope

This policy applies to all students at the College, whether day or boarding. The policy applies regardless of whether the abuse takes place at College or elsewhere, in person or online.

Definitions:

Child-on-child abuse can be defined as “any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate).”⁴ The DfE defines child-on-child abuse as “abuse by one child of another child – regardless of the age, of the stage of development, or any differential between them.” Child-on-child abuse is a safeguarding issue for both the child experiencing harm and the child alleged to have caused harm. (KCSIE, 2026).

Child-on-child abuse can take various forms (but not limited to):

- a. Bullying – including cyberbullying, prejudice-based and discriminatory bullying. The College regularly uses the Anti-bullying Alliance definition when speaking to young people: “The repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological. It can happen face-to-face or online.”
- b. Hate incidents and hate crimes – which may also include an online element.
- c. Abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’) – which may also include an online element. Physical abuse – such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing

³ Farrer & Co. (2022, September). *Addressing child-on-child abuse: A resource for schools and colleges*. Farrer & Co Safeguarding Unit

⁴ Firmin, C. 2017. *Abuse Between Young People: A Contextual Account*

physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).

d. Prejudice-based incidents:

Racism – occurs when a person is treated less favourably because of their skin colour, nationality, ethnicity, or cultural group. Racist behaviour can include verbal abuse, physical attacks, exclusion from activities or opportunities and microaggressions, which can be conscious and unconscious. It can occur in person or online.

Faith-targeted abuse: any abuse, harassment, intimidation, discrimination, hostility or violence directed towards a person because of their actual or perceived religion, faith, belief, or lack of religious belief. It can include verbal, physical, emotional, sexual or online abuse, as well as coercion, threats, exclusion, or attempts to control or punish someone because of their faith or beliefs.

Antisemitism: prejudice, hostility, discrimination or hatred directed towards Jewish people because they are Jewish or are perceived to be Jewish. It can be expressed through attitudes, language, behaviour or actions, and may include antisemitic stereotypes, conspiracy theories, harassment, abuse, threats, discrimination, or attacks against Jewish people, communities, institutions, property or religious and cultural practices.

Islamophobia: prejudice, hostility, discrimination or hatred directed towards Muslims, or people perceived to be Muslim, because of their actual or perceived Muslim identity or association with Islam. It can be expressed through attitudes, language, behaviour or actions, and may include stereotyping, harassment, abuse, threats, discrimination, exclusion, or attacks against Muslims, communities, institutions, property, or religious and cultural practices.

It should be noted that faith-targeted abuse can affect *people who are not themselves religious*, for example where someone is targeted because they are perceived to belong to, support, or associate with a particular faith community.

- e. **Sexual abuse** involves forcing, causing or inciting a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. Sexual abuse may also include non-contact activities, such as involving children in looking at, or the production of, sexual images; watching sexual activities; encouraging children to behave in sexually inappropriate ways; or grooming a child in preparation for abuse, including via the internet. Sexual abuse can be carried out by adults or by other children. It is important to recognise that there are specific offences for children under 13, who can never provide valid consent to sexual activity, and that sexual activity with a child under 16 is an offence regardless of whether the child appeared to agree to that activity. Any concerns

relating to sexual abuse will be treated as a safeguarding matter and responded to in accordance with this policy and statutory guidance.

Sexual abuse may occur both in person and online and can include technology-facilitated abuse, image-based abuse, AI-generated sexual imagery, coercion and exploitation through digital platforms.

- f. **Harmful sexual behaviour (HSB)** – this is defined as “Sexual behaviours expressed by children that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child or adult” (Hackett, 2014). Hackett’s continuum model (Appendix B) provides a useful guide in classifying sexual behaviour⁵.

(It should be noted that the College rules may forbid behaviour that might be considered ‘normal’ using this tool.)

All staff should recognise that Harmful sexual behaviour (HSB) exists on a continuum, ranging from developmentally expected and appropriate behaviour, through inappropriate or problematic behaviour, to abusive or violent behaviour that may constitute a criminal offence. Not all sexualised behaviour displayed by children is harmful or abusive; however, all concerns should be considered carefully in the context of the child's age, developmental stage, understanding, consent, power imbalance, and the nature, frequency, and impact of the behaviour. Professional curiosity and informed professional judgement are essential when assessing concerns, and staff should seek advice from the Designated Safeguarding Lead where there is any uncertainty. The College recognises that children who display harmful sexual behaviour may themselves have experienced abuse, trauma, exploitation or other adverse experiences. Accordingly, concerns about harmful sexual behaviour will always be addressed through a safeguarding lens, ensuring that both the child who has experienced harm and the child displaying harmful behaviour receive appropriate assessment, support and intervention, whilst any disciplinary or criminal processes are considered separately where appropriate.

HSB can occur online and/or face to face and can also occur simultaneously between the two. Many types of HSB can constitute a criminal offence and others may, if they are non-consensual, also breach other laws such as breach of privacy, data protection legislation (Data (Use and Access) Act 2025), Malicious Communications Act 1988, or constitute stalking or harassment under the Protection from Harassment Act 1997. Types of HSB include, for example:

⁵ [Harmful sexual behaviour framework: an evidence-informed operational framework for children and young people displaying harmful sexual behaviours \(nspcc.org.uk\).](https://www.nspcc.org.uk/what-we-do/our-work/harmful-sexual-behaviour-framework/)

- **Sexual violence** – such as rape, assault by penetration, sexual assault (which may include an online element which facilitates, threatens and/or encourages sexual violence) and causing someone to engage in sexual activity without consent (such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party);
- **Sexual harassment** - which is ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college – can include (but is not limited to):
 - Sexual comments, such as; telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names, intrusive questions about a person’s sex life, and spreading sexual rumours;
 - sexual “jokes” or taunting;
 - suggestive looks, staring or leering;
 - sexual gestures;
 - physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the person(s) who has been harmed);
 - displaying pictures, photos or drawings of a sexual nature,
 - Online sexual harassment - this may be stand-alone or part of a wider pattern of sexual violence and/or harassment. It may include:
 - Consensual and non-consensual making, possessing and sharing of nudes and semi-nudes, including AI-generated or digitally manipulated images (“deepfakes” or “deep nudes”). Such incidents will be treated as safeguarding concerns and responded to in the same way as any other incident involving the sharing of nude or semi-nude images.; ;
 - sharing of unwanted explicit content;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including on social media, sexual exploitation, coercion, and threats, and
 - coercing others into sharing images of themselves or performing acts they are not comfortable with online.
 - **Upskirting** – which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the person who has been harmed humiliation, distress or alarm and is a criminal offence under the Voyeurism (Offences) Act 2019.

- Initiation/hazing type violence and rituals – this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.
- g. **Child exploitation** – forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. This may be in exchange for something the child needs or wants, for the financial advantage or increased status of the person or people exploiting or facilitating the exploitation, and/or through violence or the threat of violence. It is usually considered to fall into two categories:
- **Child sexual exploitation (CSE)** – including in the context of abusive relationships, and/or gang activity, and/or county lines – including in the context of modern slavery and human trafficking; and/or
 - **Child criminal exploitation (CCE)** – including in the context of abusive relationships, and/or youth or serious youth violence, and/or gang activity, and/or county lines – including in the context of modern slavery and human trafficking.
 - CSE and CCE can affect children, of any gender, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. CSE and CCE do not always involve physical contact; CSE and CCE can also occur through the use of technology.

Abuse may take place face to face or online. Online child-on-child abuse is any form of child-on-child abuse where an element might be facilitated by digital technology, for example, consensual and non-consensual sharing of nude and semi-nude images and/or videos (sometimes called 'sexting'), online abuse, coercion and exploitation, child-on-child grooming, threatening and hate speech delivered via online means, the distribution of sexualised content (which might be youth-produced, commercial pornography or pseudo sexual images), and harassment.

Vulnerability and Risk Factors

Any child can be vulnerable to child-on-child abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. However, as individual and situational factors can increase a child's vulnerability to being abused by or abusing their peers, the College considers all relevant factors when dealing with instances of child-on-child abuse. This means that, when investigating an incident, supporting those involved and considering any appropriate sanctions as well as when considering whether incidents are being reported and reviewing this policy and its outcomes, the College will recognise and consider:

- (a) that certain children may face additional barriers to reporting an incident because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation;
- (b) that students with SEND or certain health conditions can face additional safeguarding challenges and may be more prone to child-on-child group abuse;
- (c) that children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers;
- (d) that child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up;
- (e) intersectionality, that is the recognition that people's experiences are shaped by their multi-layered identities. A person's interactions with the world are shaped by their sex, ethnicity, age, gender, sexuality, disability, class, socio-economic status and abilities, and these aspects of a person's identity interrelate. Someone may experience racism, sexism and ageism collectively or individually at different times and in different environments. For example, a teenage black boy may experience discrimination based on the fact that he is both black and male. The effect of his experiences may influence whether he is comfortable accessing support if he is a victim of child-on-child abuse;
- (f) as part of (b) above, adultification. This is a form of racial prejudice in which children from minoritised groups are treated as more mature than they actually are by a reasonable social standard of development. This may lead to failure to recognise victims of child-on-child abuse and to respond appropriately to the experiences of children from minoritized ethnic groups. Whilst adultification can impact all children in certain ways it is important that there is an acknowledgement that it specifically affects Black children. Their behaviour may also attract a harsher disciplinary response than the same behaviour in white peers of the same age. To address this risk, behaviour policies should be applied consistently and behaviour sanctions regularly reviewed for evidence of discrimination against children from minoritized ethnic groups;
- (g) that children displaying abusive or harmful behaviours may themselves have experienced trauma, abuse, exploitation or unmet safeguarding needs requiring assessment and support.
- (h) that those who have already been subject to abuse are more vulnerable to further abuse. For example, an image of a child could be shared, following which they could become more vulnerable to child-on-child abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family;
- (i) that peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to child-on-child abuse.

To ensure that this is considered appropriately in connection with each incident of child-on-child abuse, prior to starting an investigation into an alleged incident, the relevant staff will

check iSAMS for relevant information and, where appropriate, seek advice from the pastoral and/or safeguarding teams.

The College recognises that the types of child-on-child abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, sexual bullying in schools and other settings can result in the sexual exploitation of children by their peers. For 16 and 17 year olds who are in abusive relationships, what may appear to be a case of domestic violence may also involve sexual exploitation. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to child-on-child abuse therefore needs to consider the range of possible types of child-on-child abuse set out above and capture the full context of children's experiences.

Identification of child-on-child abuse

Wellington College expects all of its staff to be vigilant in respect of the dynamics of peer groups in the College, and to be alert to the wellbeing of students and to signs of abuse. They should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. Staff should exercise professional curiosity when behaviour changes are observed and remain alert to children who may not recognise that what they have experienced constitutes abuse or who may not yet feel ready to disclose. Staff know to be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ. Staff are trained to be aware that signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse and can include – for example:

- (a) being afraid of particular places and/or situations and/or making excuses to avoid particular people
- (b) being afraid/reluctant to go to school, being mysteriously 'ill' each morning, or skipping school
- (c) running away or regularly going missing from home, care, or education
- (d) experiencing difficulties with mental health and/or emotional wellbeing
- (e) becoming nervous, anxious, distressed, clingy or depressed
- (f) becoming isolated from peers/usual social networks, losing confidence and becoming withdrawn
- (g) self-harming or having thoughts about suicide
- (h) having problems eating (including developing eating disorders) and/or sleeping (including suffering from nightmares)
- (i) regularly wetting the bed or soiling their clothes
- (j) belongings getting 'lost' or damaged
- (k) asking for, or stealing, money (to give to a bully)

- (l) unexplained gifts, money or new possessions (e.g. clothes and/or mobile phone)
- (m) unexplained physical injuries and other signs of physical abuse
- (n) changes in appearance – e.g. weight loss
- (o) changes in performance and/or behaviour at school
- (p) knowing about or being involved in ‘adult issues’ which are inappropriate for their age or stage of development, for example, alcohol, drugs and/or sexual behaviour
- (q) involvement in abusive relationships
- (r) involvement in gangs or gang fights
- (s) having angry outbursts, or behaving aggressively or abusively (including displaying harmful sexual behaviour) towards others

The College recognises that abuse affects children very differently, that the above list is by no means exhaustive, and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Concerns may also of course be raised by parents, peers, and others.

Rather than checking behaviour against a list, all staff at the College are trained to be alert to behaviour that might cause concerns, to use their professional curiosity and think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour (by asking open questions at the right time to prompt discussion) and, where appropriate, to engage with their parents so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for their age, staff are expected to consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards. The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of child-on-child abuse a power imbalance will exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

The College will investigate any reported incident to determine if it constitutes child-on-child abuse and whether any sanctions are appropriate. In determining this, the staff involved in the matter will rely on their extensive experience.

The College recognises that all behaviour takes place on a spectrum. Therefore, the College will investigate any alleged incident of child-on-child abuse to understand where it falls on the spectrum in order to be able to respond appropriately in supporting those involved and, where appropriate, imposing sanctions. To do this, staff involved will rely on their extensive experience and may also refer to the Hackett continuum model (Appendix B).

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- (a) Is socially acceptable
- (b) Involves a single incident or has occurred over a period of time
- (c) Is socially acceptable within the peer group
- (d) Is problematic and concerning
- (e) Involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- (f) Involves an element of coercion or pre-planning
- (g) Involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power
- (h) Involves a misuse of power

It should be borne in mind that behaviour which is not abusive at first may potentially become abusive quickly or overtime. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies. For example, a physical fight between two students may not constitute child-on-child abuse where the fight is a one-off incident but may be abusive where the child's/children's behaviour subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership – including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child.

The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual student basis but could also apply across the student body. Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which the College may need to adopt a whole-school approach in order to prevent escalation. For example, where multiple boys are making inappropriate comments about girls, one-off sanctions are unlikely to be effective and wider actions should be considered, such as arranging for an external person to deliver a year group intervention exercise or a house-based discussion with a tutor.

If there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject of the concern(s)/allegation(s) is considered or suspected by the DSL to constitute child-on-child abuse, the College will follow the procedures set out below.

Staff should always use their professional judgment and discuss any concerns with the DSL as soon as possible.

Reporting and Disclosure

It is essential that all concerns/allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our College environment. All reports of harmful sexual behaviour, sexual harassment or sexual violence will be treated seriously, regardless of whether the alleged incident occurred on or off the College site, online or offline, or how long ago it is reported to have taken place. The College recognises that children may disclose abuse in different ways, including indirectly through changes in behaviour, through another child, anonymously or over a period of time. Staff will always act immediately upon any concern rather than waiting for a formal disclosure and will adopt an attitude that 'it could happen here'. Any response should:

- (a) as detailed above, include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);
- (b) follow a Contextual Safeguarding approach⁶;
- (c) treat all children involved as being at potential risk— while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. The College will ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it as well as considering any appropriate sanctions for the latter. Immediate consideration will also be given to the safety of other students who may be affected, including siblings, friendship groups, boarding peers and any students who may be exposed to ongoing risk.
- (d) take into account the views of the child/children affected. Unless it is considered unsafe to do so (for example, if there is a concern that might place an individual already vulnerable at greater risk of harm, or where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made, although it is important to be clear that consent is not required if it is thought the child protection threshold has been met. Should the child not wish for their parents to be informed, their wishes will be taken seriously and discussed within the safeguarding team and external advice sought. The College will manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

⁶ Contextual Safeguarding is an approach to safeguarding children that recognises their experiences of significant harm in extra-familial contexts, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities. It recognises that as children enter adolescence, they spend increasing amounts of time outside of the home in public environments (including on the internet) within which they may experience abuse. Additionally, it considers interventions to change the systems or social conditions of the environment in which abuse has occurred. For example, rather than move a child from a school, professionals could work with the school leadership and student body to challenge harmful school cultures, thus improving the pre-existing school environment.

The College recognises that incidents of alleged sexual violence and/or harassment are likely to be complex, requiring swift and sensitive handling. The DSL and Safeguarding Manager have undertaken Sexual Misconduct Liaison Officer training in order to help them handle such allegations.

If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. The member of staff will seek to control the situation, to reassure and support the students involved without promising absolute confidentiality and will report the incident to Assistant Head (Students) and inform the Safeguarding Team as soon as possible. The incident will be logged on CPOMS. The DSL will inform other relevant members of staff, for example the students' HM, and any subsequent investigation will be carried out under the Investigations Policy. A flowchart detailing the actions taken following an allegation can be seen in Appendix C.

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the College is doing all that it can in respect of the safety of the child/all children affected. DSLs should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult with children's social care and/or any other external agencies on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL should contact Bracknell Forest Safeguarding Our Schools team immediately, and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the allegations/concerns and agree on a course of action, which may include:

- (a) Manage internally with help from external specialists where appropriate and possible
- (b) Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family. These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services
- (c) Refer child/children to Children's Social Care, clearly setting out risks. It will then be for Children's Social Care to determine whether it meets their threshold for either a section 17 or 47 statutory assessment
- (d) Report alleged criminal behaviour to the Police and refer to "when to call the police guidance" from the NSPCC

Alleged criminal behaviour will ordinarily be reported to the Police. However, there are some circumstances where it may not be appropriate to report such behaviour to the Police. For example, where the exchange of nudes and semi-nudes does not involve any aggravating factors. All concerns/allegations will be assessed on a case-by-case basis, and in light of the wider context.

It is recognised that incidents of child-on-child abuse may also be reported through other means including: the counselling team, health centre, Whisper (College anonymous reporting tool), students or parents. In all cases, the DSL should be contacted as soon as possible.

Staff must:

- Recognise that if a child/young person who has been harmed has made a disclosure to them, then the child/young person has placed them in a position of trust. They must be supportive and respectful of the child/young person.
- Reassure the child/young person who has been harmed that they are being taken seriously, will be supported and kept safe.
- Avoid giving the impression that a child/young person who has been harmed is causing a problem by reporting an incident
- Listen calmly and reassuringly as the child/young person who has been harmed shares their account.
- React to what is disclosed with belief and tell the child/young person who has been harmed that they have done the right thing in making a disclosure.
- Listen carefully without passing judgement, but being clear about boundaries and next steps
- Use the child's/young person's own language wherever possible, reflect back what has been shared, ask only open questions for clarification and avoid interpretation or expressing personal opinions
- Indicate to the child/young person who has been harmed what action they will take and make it clear that they will have to inform others (no promise of confidentiality)
- Make an accurate record of what has been said and avoid giving opinions. Consideration will need to be given as to the best way to do this, although best practice is to wait until the end of the disclosure before writing up a thorough summary.
- If practicable, wherever possible reports should be received by two members of staff, one of whom should ordinarily be the Designated Safeguarding Lead (or Deputy DSL). Where this is not possible, the DSL must be informed as soon as reasonably practicable following the disclosure
- Remember that the priority is always to protect the child
- Explain that the law is in place to protect children and young people rather than criminalise them
- Understand that a child/young person that has been harmed may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis and it is essential that dialogue is kept open and encouraged
- Recognise that an initial disclosure may not reflect the full extent of the abuse. Trauma may affect memory, recall and the order in which information is disclosed.

Staff should therefore allow the child to disclose information at their own pace and avoid expecting a complete account during the first conversation.

Staff must not:

- Contact the parents directly
- Make the child/young person who has been harmed feel that they are creating a problem by reporting
- Underplay the issue
- View or forward illegal images of a child. If there is an online element, then [this advice](#) is essential. ("Sharing nudes and semi-nudes: advice for education settings working with children and young people". Updated March 2024)
- Speak to the child/young person alleged to have caused harm about whom the allegations have been made
- Ask leading questions or adopt an interrogation approach
- Promise to keep secrets/confidentiality (as it is very likely that a concern will need to be shared further)
- Share the report or details of the report with anyone other than the DSL
- Ask the child/young person outright if an act of sexual violence or harassment has been committed (although staff can ask children if they have been harmed and what the nature of that harm was)

Staff must never promise confidentiality and the College will only share information with agencies who are required for the support of the children involved and to further any investigation. If the child/young person who has been harmed asks for information not to be shared, the DSL must balance their wishes with the duty to protect other children. In reaching this decision, the DSL will carefully balance the wishes of the child with the College's wider safeguarding duties, considering the safety of the child making the report, the protection of other children, any ongoing risk of harm, the legal basis for sharing information under data protection legislation, and whether specialist agencies should be involved. In particular, the DSL must understand that:

- a) Parents or carers are usually informed unless sharing this information would put the child/young person who has been harmed at greater risk
- b) If a child/young person has been harmed, is at risk of harm, or is in immediate danger, then the general safeguarding principle of making a referral to CSC should apply
- c) Rape, assault by penetration, and sexual assault are crimes and the starting point should be that they should be referred to the police

If the DSL does decide to make a referral against the wishes of the child or young person who has been harmed, the reasons for doing so must be explained sensitively and appropriate, specialist support should be offered.

Specific actions taken immediately following a disclosure of sexual violence and/or harassment can be seen in Appendix D.

Immediate safeguarding actions

Following any report of child-on-child abuse, the DSL (or Deputy DSL) will immediately consider whether any protective measures are required whilst enquiries are undertaken. These decisions will be based on an individual risk assessment and will always prioritise the safety and wellbeing of all children involved. Depending upon the circumstances, immediate protective measures may include temporary changes to teaching groups, boarding arrangements, recreational activities, dining arrangements, transport, movement around the College site, supervision levels, contact arrangements between students, or access to particular areas of the College. The College will also consider whether additional supervision is required during periods where students may be at greater risk, including before school, after school, during transitions and within boarding houses.

These measures are neutral safeguarding arrangements designed to protect all children involved whilst enquiries are undertaken. They should never be interpreted as determining responsibility or outcome. Further information can be found in the Safeguarding Risk Management Policy.

Risk management

Where there is an incident of child-on-child abuse, first and foremost, the College will be guided by the Police and Children's Social Care, if they are involved. The College will undertake a robust risk and needs assessment for each child/young person affected by the abuse, including both the child/young person who has allegedly experienced harm and the child/young person alleged to have caused harm, in accordance with the College's Safeguarding Risk Management Policy

Any risk assessments and safety plans drawn up will:

- (a) Assess and address the nature and level of risks that are posed and/or faced by the child
- (b) Engage the child's parents and draw upon local services and agencies to ensure the College is doing all we can in respect of the child's long-term needs.⁷
- (c) Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child
- (d) Be reviewed at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.

⁷ unless the child has expressly indicated that they do not want their parents informed and this has been discussed by the safeguarding team and an external advisor.

If, at any stage, the child's needs escalate, the DSL should contact the Bracknell Forest Safeguarding Our Schools team to determine the appropriate course of action. Throughout the management of any report, the College will continue to work collaboratively with parents (where appropriate), Children's Social Care, the Police and other relevant agencies. The College recognises that safeguarding responses often extend beyond the conclusion of any disciplinary or criminal process and will ensure that support plans remain under review for as long as required.

Risk assessments and safety plans will remain live documents throughout the management of the case. They will be reviewed regularly, following any significant development, and whenever new information becomes available. The rationale for all decisions, including any amendments to safety measures or support arrangements, will be recorded clearly within the safeguarding record.

Support for students

The College understands that it has a duty to safeguard and support both the student(s) who has allegedly been harmed and the student(s) alleged to have caused harm when an accusation of child-on-child abuse has been made.

In accordance with the flow chart in Appendix C, a case manager (a DSL or DDSL) will be assigned to the case. If deemed appropriate a SWiM will be allocated to all students involved.

Safeguarding and supporting the student who has been harmed

The following safeguarding principles will underpin all support given:

- a) The College will think carefully about the language used, for example the student may not wish to be described as a "victim";
- b) The case will be managed in a manner that avoids any form of victim blaming (see Appendix E)
- c) Due consideration will be given to developmental stage of the student, the nature of the allegations and the risk of further abuse;
- d) The College will be aware that a power imbalance is likely to have been created between the alleged student who has caused harm to the other student;
- e) As well as protecting all students involved, the needs and wishes of the harmed student should be at the centre of any response and they should feel as much in control of the process as reasonably possible;
- f) The priority should be to make the student's daily experience as normal as possible and to ensure that the College is a safe space for them;
- g) As all incidents will be different, proportionality of response will be considered, and support given on a case-by-case basis;
- h) It may be that the harmed student do(es) not disclose the whole situation immediately, so on-going dialogue and support is vital;

- i) Young people who are likely to have suffered some trauma may struggle in normal school environments;
- j) The student may require support for a long time;
- k) The College will protect the student from bullying or harassment because of what has happened in the past;
- l) If a student who has been harmed is unable to remain in the College and it is their wish to move elsewhere, the College will fully support them in this decision, and the DSL will make any new institution fully aware of any ongoing support needs as well as passing on their safeguarding file.

Although this list is not exhaustive, the College may employ the following strategies to safeguard and support any child who has experienced harm as a result of child-on-child abuse:

- Allow the student who has been harmed to choose a designated trusted adult (such as an HM or tutor) with whom they can regularly meet to talk about their needs;
- Allow the student who has been harmed to withdraw from lessons and/or other activities if they are finding it difficult to maintain full involvement with College life;
- Give the student who has been harmed a protected safe space (which may or may not be in their House) to which they can withdraw if needed;
- Offer the student who has been harmed ongoing support from the College counselling service;
- Provide the student who has been harmed with the details of external agencies, for example, a [Sexual Assault Referral Centre](#), who may be able to offer additional support (KCSIE 2026 will be used as reference for the external support for child-on-child abuse cases);
- Make clear to the student who has been harmed that they should report any incidents of unpleasant behaviour to their HM and the Assistant Head (Students) giving full details of what happened;
- Encourage expert mediation to restore trust between the student who has been harmed and student who has caused harm;
- Involve the student who has been harmed in drawing up a personal welfare plan (WRAP), if appropriate, detailing specific strategies and channels of support;
- Consider ways to minimise possible contact between the student(s) who has been harmed and the student(s) alleged to have caused harm during the school day by constructing risk assessments and safety plans in accordance with the Risk Management Policy

Safeguarding and supporting the student who has caused harm

Where incidents of child-on-child abuse are alleged to have taken place, the following safeguarding principles should underpin all support given:

- a) The College will think carefully about the language used, especially if the student denies the accusation(s) made against them;
- b) The College has a duty to provide an education to the alleged student, especially if the student denies the accusation(s) made against them;
- c) The College also has a duty to provide the alleged student with safeguarding and pastoral support, as appropriate;
- d) Committing an act of sexual harassment or sexual violence may be a sign that a child has been abused themselves or a sign of wider, contextual issues which require addressing;
- e) All alleged students are entitled to and should be provided with support which will enable them to understand and overcome the reasons behind their behaviour, thus protecting other children by limiting the likelihood of such behaviour in the future;
- f) Due consideration should be given to the age and developmental stage of the alleged student as well as the nature of the accusations;
- g) It is likely that any student will experience stress as a result of being the subject of allegations and/or negative reactions by their peers to accusations made against them and this will be considered in the student's safety plan;
- h) As all incidents will be different, proportionality of response will be considered, and support given on a case-by-case basis;
- i) If an alleged student moves to another school, the DSL will make any new institution fully aware of any ongoing support needs and potential risks to others, as well as passing on their safeguarding file.

Although this list is not exhaustive, the College may therefore employ the following strategies to safeguard and support any student who has caused harm to another *alongside* any disciplinary measures. These strategies may include:

- Considering ways to minimise possible contact between the person(s) harmed and the person(s) who caused harm during the school day through risk assessments and safety plans.
- Encourage expert mediation to restore trust between the students involved;
- Offer alleged students ongoing support from the College counselling service;

Disciplinary action

All disciplinary action for cases of child-on-child abuse will be dealt with according to the Investigations Policy and Behaviour Management Policy. This process is overseen by the Assistant Head (Students) and the Second Master.

Before deciding on appropriate disciplinary action, the College will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any

unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it. The College will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. Exclusion will only be considered as a last resort and only where necessary to ensure the College is fulfilling our duty to do all that we can in respect of the safety and wellbeing of the other children in the College.

Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the College will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards.

Recording

All child-on-child abuse incidents will be recorded on CPOMS. This enables regular reporting and review by the safeguarding team as well as presenting figures to the Governing Body when required. A separate log of disciplinary action arising from child-on-child abuse is kept by the Second Master and a separate log of sexual violence and harassment is kept by the DSL. Ongoing educational work and support for students concerned will also be recorded in CPOMS.

Review, Evaluation, and Accountability

Following any significant case of child-on-child abuse, and particularly those which have involved external agencies, the DSL will convene a “lessons learned” meeting where all individuals involved will be asked to contribute on any aspects of the case which went well and any areas which could be improved. This will be noted on the students CPOMS file on the “lessons learned” tab.

Each term, the safeguarding team peer audit safeguarding chronologies in accordance with the Safeguarding File Auditing Policy. This practice is undertaken for several key reasons:

- To help ensure accuracy and completeness;
- Peer review promotes consistency in record-keeping, making sure that all safeguarding chronologies meet the same high standards and follow agreed protocols;
- It provides an opportunity for professional development, as staff can learn from each other’s approaches and interpretations, strengthening overall safeguarding practice;

- To help with the identification of patterns or concerns that may not be obvious to one individual, supporting early intervention and better outcomes for students in the College;
- To demonstrate a culture of accountability and transparency, which is crucial for safeguarding;
- To reduce the risk of bias or subjectivity, as more than one perspective is considered in recording and interpreting safeguarding information.

The College is also audited annually by an external auditor who will check several cases of child-on-child abuse to ensure that decision making, and record keeping is accurate, timely, consistent, evidenced correctly and that actions have been taken in accordance with College policies and statutory guidance. The College is committed to undertaking a proactive, thorough approach in its approach to all child-on-child abuse cases.

Multi-agency working

The College actively engages with its local partners in relation to child-on-child abuse, and works closely with, for example, Bracknell Forest Local Authority and Safeguarding Our Schools team, Children's Social Care, Thames Valley Police and/or other relevant agencies, and other schools. The relationships the College has built with these partners are essential to ensuring that the College is able to prevent, identify early, and appropriately handle cases of child-on-child abuse.

The College actively refers concerns/allegations of child-on-child abuse where necessary to the relevant agencies listed above. It considers this to be particularly important because child-on-child abuse can be a complex issue, and even more so, where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

Prevention and Education

In line with our Safeguarding Policy, the concept of prevention lies at the heart of Wellington College's approach to safeguarding and student welfare. We strive to achieve this through fostering a positive school atmosphere, vigilant and careful teaching, robust pastoral care, the promotion of our core College values, particularly Kindness and Respect, and by providing effective support and strong adult role models for our students. As with all safeguarding matters, staff maintain the attitude that 'it could happen here', ensuring ongoing vigilance. The College actively promotes an inclusive and anti-discriminatory culture

where racism, faith-targeted abuse and all other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities.

Wellington College adopts a whole-school approach to safeguarding, which includes formal classroom opportunities for student learning via our Wellbeing curriculum. This is supplemented by regular input from external agencies, who deliver assemblies, talks, and workshops to further educate our students. For more details about the ways in which we teach about healthy relationships, sex, and consent, both inside and outside lessons, please see Appendix F. Students are frequently reminded of what to do if they witness or experience abuse, the impact it can have, and the vulnerabilities that may lead to such behaviours.

The College is committed to raising awareness of and preventing all forms of child-on-child abuse. This is achieved by educating all Governors, staff, volunteers, students, and parents about the nature, prevalence, and effects of such abuse, as well as how to prevent, identify, and respond to it. All staff, including Governors and the Executive Leadership Team, receive regular training on these issues.

Parents are engaged through pastoral talks, online podcasts, and are encouraged to hold the College accountable on these issues. All concerns relating to child-on-child abuse should be reported to the Designated Safeguarding Lead (DSL) and the Deputy Head (Pastoral), who monitor trends and ensure appropriate support is provided. The College works actively to challenge attitudes that underlie abuse, promote positive values, and foster a culture of tolerance and respect among all members of the community. We aim to create an environment where students feel safe to share concerns in a non-judgmental setting and are confident, they will be listened to and supported

The College Rules, as detailed in the printed calendar, reinforce these principles by encouraging respect, good manners, and consideration for others; protecting students from harm; supporting academic, personal, and social development; facilitating effective communication among students, parents, and staff; and promoting the exercise of common sense at all times. As such, incidents of child-on-child abuse are considered serious breaches of our core values and the principles on which life at Wellington College is based. The Second Master also speaks at an assembly for each year group at the start of the academic year, making clear to all students what constitute the disciplinary "red lines".

To further support students, the College provides access to an independent listener, displays advice and helplines throughout the campus, and delivers leadership training to prefects on supporting younger and vulnerable students. Talks to students, stress that the College does not tolerate peer-group initiation ceremonies or hazing rituals, and all staff remain alert to such behaviours. In respect of cyber-bullying, students are expected to adhere to the Acceptable Use Policy, and the IT Department monitors usage to ensure safety and privacy.

For parents, the College's policies are readily accessible via the Parent Portal, and open communication with House staff is encouraged. Parents are urged to contact the College with any concerns regarding their child's welfare, and all concerns are treated seriously and confidentially. Feedback from parents is welcomed to continually improve our preventative measures and overall approach.

Through these comprehensive measures, Wellington College aims to ensure that all members of the community are clear about the standards of behaviour expected and that every student feels safe, respected, and supported during their time at the College.

Reviewed by Delyth Lynch 1st September 2025

Reviewed by Delyth Lynch, 1st September 2026 (to incorporate KCSIE 2026 changes)

Appendix A: The role of the Student Wellbeing Mentor at Wellington College

The Student Wellbeing Mentor is a key role within our child-on-child abuse procedures at Wellington College, responsible for providing a trauma-informed response to disclosures and incidents of child-on-child abuse, including: Sexual harassment, sexual assault, and other forms of sexual violence; physical abuse and harassment and emotional abuse and harassment.

The SWiM will support students affected by an incident of child-on-child abuse, ensuring they receive appropriate care, guidance, and access to support services.

Once an incident of child-on-child abuse has been reported, where possible both the 'reporter' and the 'reported' will be able to choose from a list of fully trained SWiM staff, in accordance with the flowchart (Appendix 1). It may well be that a student may choose a SWiM to initially disclose an incident of child-on-child abuse to. In this case, this individual will support that student throughout the case.

A DSL will act as an overseeing case manager throughout and be responsible for the overarching incident itself which includes liaison with external agencies and other senior staff to keep them abreast of the situation. The DSL will take a completely neutral standpoint in every case.

Key responsibilities:

- To provide a compassionate, non-judgmental first response to a disclosure of child-on-child abuse
- Utilise trauma informed approaches (learnt in training) to support individuals who have experienced some form of child-on-child abuse – either being the 'reporter' or 'reported' student

Support and Guidance:

- Conduct initial needs assessments for those affected by child-on-child abuse, working with the DSL and HM to construct a safety plan for the student
- Work alongside the student to check on their wellbeing and any specific needs which they may have throughout an investigative phase and then ongoing for the length of time as deemed necessary by the DSL case manager and HM

Facilitation:

- Help implement any safety plans put in place and regularly review the arrangements with the student and the DSL case manager
- Facilitate access to appropriate internal and external support services as required by the student
- Collaborate with relevant staff across the College in order to implement safety measures and support strategies that have been put in place
- Facilitate access to any supportive education initiatives for the student which may be suggested by the disciplinary team following an incident

Education and Prevention:

- Provide appropriate guidance to the safeguarding team on the College's child-on-child abuse policies and procedures, suggesting amendments based on their experiences with the young person and in their role as a SWiM.

Liaison and Coordination:

- Provide information to the DSL case manager which will be relevant and helpful in the writing of an overarching incident risk assessment
- Where appropriate act as a liaison between parents and the College so that the student's parents are fully informed about any actions and support which is in place
- Liaise with the DSL with regards to any external agency contact and whether they can assist with the coordination of this
- Liaise with any internal staff (such as counsellors, Health Centre) as appropriate as well as the HM to ensure that there is no overlap on the support given

Record Keeping and Reporting

- Maintain accurate, confidential records of all cases and interventions on CPOMS (or should notes have been taken by hand, to pass these on to the DSL case manager)

Professional Development

- Engage in ongoing training and professional development to stay current with best practices in responding to child-on-child abuse and trauma informed approaches within pastoral care
- Participate in supervision and self-care activities to maintain personal wellbeing

Appendix B: Hacketts Continuum of Harmful Sexual Behaviours

Source: <https://safeguardingchildren.co.uk/beaware-professionals/hsb/>

Responding to children who display sexualised behaviour

It's important to be able to distinguish developmentally typical sexual behaviours from those that may be problematic or harmful, and make sure children get appropriate support. Always consider the child's holistic needs and safeguarding concerns alongside any sexualised behaviour and follow due procedures accordingly. This guide is a tool to support objective decision making about a child or young person's sexual behaviour and does not replace professional judgement or policy and legislation. Visit nspcc.org.uk/hsb for more information.

Need advice?

Contact our helpline for advice and support:

- Call **0808 800 5000**
- Email help@nspcc.org.uk
- Visit nspcc.org.uk/helpline

Childline

For children who need further support our free, confidential helpline is available 24/7:

- Call **0800 1111**
- Visit childline.org.uk

Developmentally typical		Problematic		Harmful	
Hackett Continuum					
Normal	Inappropriate	Problematic	Abusive	Violent	
• Developmentally expected and socially acceptable behaviour • Consensual, mutual and reciprocal • Decision making is shared	• Single instances of developmentally inappropriate sexual behaviour • Behaviour that may be socially acceptable within a peer group but not in wider society • May involve an inappropriate context for behaviour that would otherwise be considered normal	• Developmentally unusual and socially unexpected behaviour • May be compulsive • Consent may be unclear and the behaviour may not be reciprocal • May involve an imbalance of power • Doesn't have an overt element of victimisation	• Intrusive behaviour • May involve a misuse of power • May have an element of victimisation • May use coercion and force • May include elements of expressive violence • Informed consent has not been given (or the victim was not able to consent freely)	• Physically violent sexual abuse • Highly intrusive • May involve instrumental violence which is physiologically and/or sexually arousing to the perpetrator • May involve sadism	
How to respond • Although green behaviours are not concerning, they still require a response • Listen to what children and young people have to say and respond calmly and non-judgementally • Talk to parents about developmentally typical sexualised behaviours • Explain how parents can positively reinforce messages about appropriate sexual behaviour and act to keep their children safe from abuse • Signpost helpful resources like our 'Talk PANTS' activity pack: nspcc.org.uk/pants • Make sure young people know how to behave responsibly and safely	How to respond • Amber behaviours should not be ignored • Listen to what children and young people have to say and respond calmly and non-judgementally • Consider the child's developmental age as well as their chronological age, alongside wider holistic needs and safeguarding concerns about the problematic sexualised behaviour • Follow your organisation's child protection procedures and make a report to the person responsible for child protection • Your policy or procedure should guide you towards a nominated child protection lead who can be notified and will provide support • Consider whether the child or young person needs therapeutic support and make referrals as appropriate		How to respond • Red behaviours indicate a need for immediate intervention and action • If a child is in immediate danger, call the police on 999 • Follow your organisation's child protection procedures and make a report to the person responsible for child protection • Your policy or procedure should guide you towards a nominated child protection lead who should be notified and will provide support • Typically referrals to children's social care and the police would be required. Referrals to therapeutic services should only be made once statutory services have been informed and followed due procedures		

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Learning

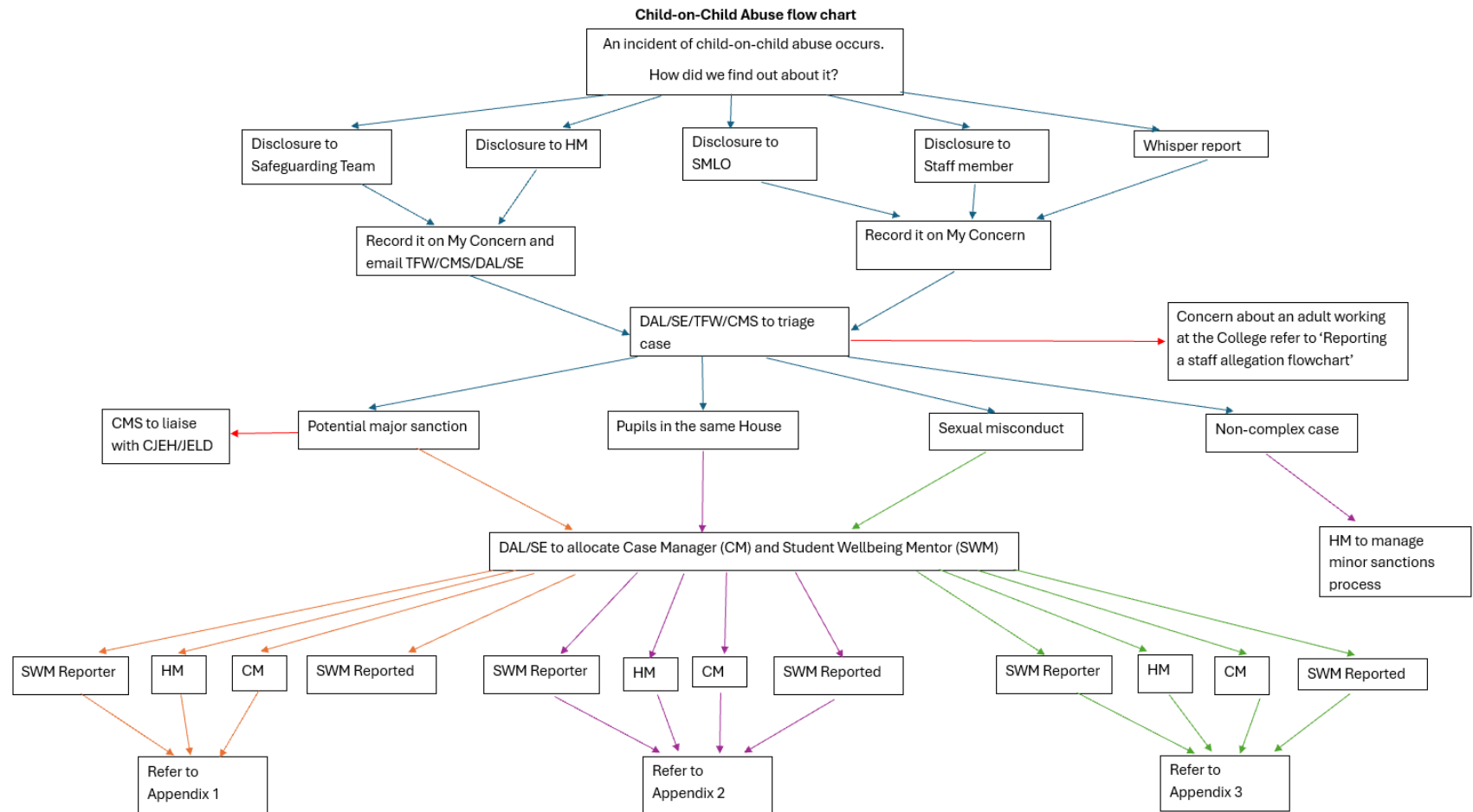
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Appendix C: Flowchart detailing the actions taken following an allegation



Appendix D: Immediate action following an allegation of sexual violence and harassment.

When the member of staff to whom the disclosure has been made has passed on their report to the DSL, they should now withdraw from the process but remain vigilant.

When reviewing any report of alleged sexual violence or sexual harassment, the DSL should act in the best interests of the student who has been harmed whilst also understanding their broader duty to protect other children. In particular, the College accepts that it is important to take the wishes of the student who has been harmed and how they want to proceed are taken into consideration. To this end, as far as is possible, the student who has been harmed should be given control over the support they will receive and how the investigation will proceed. The College will work closely with the local police and social care teams in order to understand what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred.

Other considerations for the DSL will include:

- a) the nature of the alleged incident(s), including: whether a crime may have been committed and/or whether HSB has been displayed
- b) the ages of the children involved;
- c) the developmental stages of the children involved;
- d) any power imbalance between the children. For example, is an alleged student significantly older, more mature or more confident? Does the student who has been harmed have a disability or learning difficulty?;
- e) if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- f) that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- g) are there ongoing risks to the student who has been harmed, other children, adult students or school or college staff (paying attention to possible intra-familial risks e.g. siblings)?; and
- h) other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

All allegations of sexual harassment and/or sexual violence will be different and must be dealt with on a case-by-case basis. In all incidents, however, the DSL will need to decide at which point to inform the alleged student that an accusation has been made against them. For incidents where referrals to children's social care and the police are made, the DSL will be guided by advice from those agencies when deciding upon next steps and with due regard to the statutory guidance in '[Working Together to Safeguard Children](#)' (updated February 2024). In all cases of alleged sexual violence and harassment, an 'initial steps' meeting will be convened in order to brief relevant staff. The staff likely to be involved in this meeting are the DSL, Second Master, Assistant Head (Students), the Deputy Head (Pastoral) and respective HMs.

In some cases of alleged sexual violence - for example, where it has been decided that the allegation has met the threshold for a Section 47 enquiry - it may not be appropriate for the College to investigate or to inform immediately the parents of the alleged student. In such cases, the DSL will be guided by advice from children's social care and the police. This does not, however, stop the College from taking immediate steps to safeguard the children involved, where required.

The DSL is likely to consider four possible scenarios for the response to any report of sexual violence or sexual harassment:

Managing Internally

This option will most likely be followed for incidents of sexual harassment which are one-off, do not require statutory intervention, and where early intervention would not be appropriate.

Although this list is not exhaustive, examples of incidents which would be managed internally might include: sexual jokes or taunting; lewd comments; sexual remarks about appearance or clothes; the use of sexualised names; unwanted sexual comments or messages on-line; interfering with someone's clothes; or unwanted physical contact.

It should be noted that some of these behaviours may cross-over into sexual violence depending on the severity of the behaviour. The College must also take into consideration the experience of the person who has been harmed when deciding whether the line between sexual harassment and sexual violence has been crossed.

In such cases, the response should include a thorough investigation of the allegation and the wider context in which it may have occurred. This investigation should be conducted in line with the College's Policy on Investigations. Underpinning this investigation is the principle that sexual violence and harassment is never acceptable and will not be tolerated. All discussions, interviews, decisions, and reasons behind decisions will be recorded.

Disciplinary action

The College will consider whether disciplinary action may be appropriate for any child/children involved – any such action should address the behaviour, the causes of it, and attitudes underlying it.

Disciplinary action may sometimes be appropriate:

- a) to ensure that the child/children take(s) responsibility for their actions and realise(s) the seriousness of their behaviour;
- b) to demonstrate to the child/children and others that sexual harassment will never be tolerated;

- c) to ensure the safety and wellbeing of other children.

Disciplinary interventions alone, however, will rarely solve issues of sexual harassment and/or sexual violence, and the College will always consider wider actions which may need to be taken, and any lessons that may need to be learnt going forwards. This will include employing specialist and pastoral support as appropriate, such as the College Counsellor, boarding House staff and external support agencies, as well as restorative approaches such as mediation.

Early Help

This option is similar to managing internally, but will be adopted if the DSL decides, following the initial investigation, that all or some of the children involved in the incident may benefit from targeted early help services. Such an approach may be of particular benefit to address non-violent harmful sexual behaviour to prevent it from escalating into more serious and potentially violent behaviour.

In such cases, the DSL will work in collaboration with the appropriate local authority to discuss the incident and concerns surrounding it, as well as agreeing on a course of action, which may also include some form of disciplinary action as detailed above.

Disciplinary interventions may be employed but these alone will rarely solve issues of sexual harassment, and the College will always consider wider actions which may need to be taken, and any lessons that may need to be learnt going forwards. This will include employing specialist and pastoral support as appropriate, such as the College Counsellor, boarding House staff and external support agencies.

All discussions, interviews, decisions, and reasons behind decisions will be recorded.

Referrals

If the DSL believes that a child has been harmed, is at risk of harm, or is in immediate danger, an immediate referral will be made to the relevant team to discuss the allegation and agree a course of action. At this stage, the DSL will normally inform parents or carers unless there is a compelling reason not to do so (e.g. this will put a child at additional risk).

It is possible that a section 17 and/or section 47 statutory assessment will be required, and it is the DSL's duty to cooperate and collaborate with the lead social worker to ensure that the best package of coordinated support is implemented for the child(ren) involved.

The DSL must not wait for the outcome of any children's social care investigation before taking steps to safeguard and protect the children involved, although care must be taken to ensure that

the DSL does not act in a manner which might jeopardise any statutory investigation. These considerations should be immediate.

The relevant children's social care team may decide that the incident must be reported to the police, in which case the steps detailed under section D must be followed. If children's social care decides that the threshold for a statutory investigation has not been met, then the DSL can refer again if they do not feel comfortable with this decision.

If it is agreed that a statutory investigation is not required, then the College will undertake its own investigation, led by the Second Master. Underpinning this investigation is the principle that sexual violence and harassment is never acceptable and will not be tolerated. All discussions, interviews, decisions and reasons behind decisions will be recorded.

Disciplinary interventions may be employed but these alone will rarely solve issues of sexual harassment and/or violence, and the College will always consider wider actions which may need to be taken, and any lessons that may need to be learnt going forwards. This will include employing specialist and pastoral support as appropriate, such as the College Counsellor, boarding House staff and external support agencies.

Reporting to the Police

In general, all reports to the police will be carried out alongside a referral to the relevant children's social care team and will usually take place where there are grounds to believe that rape, assault by penetration, and/or sexual assault have taken place.

In such circumstances, where a crime has potentially been committed, it is almost certain that the police will assume responsibility for investigating the alleged incident, and it is the duty of the DSL to collaborate with the police to ensure that the investigation is carried out as sensitively and as effectively as possible.

The DSL must not wait for the outcome of any police investigation before taking steps to safeguard and protect the children involved, although care must be taken to ensure that the DSL does not act in a manner which might jeopardise any police investigation. These considerations should be **immediate**, and we will not wait for the outcome (or even the start) of a police investigation before protecting the person(s) who has allegedly been harmed, the person(s) who allegedly caused harm, and other students in the school or college.

When an allegation has been reported to the police, the College should consult the police to agree what information can be disclosed to staff and others, especially the person(s) alleged to have caused harm and their parents or carers. A discussion should also take place about the best way to protect the anonymity of those involved.

As the police investigation continues, the DSL will continue to engage with the Police and specialist agencies and pastoral staff to support the person(s) who has been harmed and the person(s) who allegedly caused harm as best as possible. This will include employing specialist and pastoral support as appropriate, such as the College Counsellor, boarding House staff and external support agencies.

[This guide](#) is useful in determining whether the Police should be informed. All discussions, interviews, decisions, and reasons behind decisions will be recorded.

Appendix E: VICTIM BLAMING

What is victim blaming?

Victim blaming is any language or action that implies (whether intentionally or unintentionally) that an individual is partially or wholly responsible for abuse that has happened to them. It is harmful and can wrongfully place responsibility, shame, or blame on the person who has been harmed, making them feel that they are complicit or responsible for the harm that they have experienced. People of all ages can display victim blaming attitudes and it can happen when considering both online and offline incidents.

Why is victim blaming harmful?

One of the greatest barriers to a child or young person seeking help and reporting child-on-child abuse is feeling that they are to blame for what is happening to them. When a professional working with the child or young person speaks or behaves in such a way that this reinforces this feeling of self-blame, the impact of the abuse that the individual has already experienced may be greater.

When victim blaming occurs, there is a risk of diminishing the individual's experiences leading to a lack of, or an inappropriate, safeguarding response. This can have a devastating impact for the young person or child and make it less likely that they – or their peers - will disclose abuse in the future.

How does victim blaming present?

Victim blaming may be direct or indirect. Direct victim blaming happens when a child or young person is explicitly held responsible for what has happened to them. Indirect victim blaming is harder to identify but happens when a person is trying to 'help' following an incident. However, the 'help' that is given reinforces the idea that the child or young person has done something wrong or is responsible for what happened to them.

Some examples:

Direct victim blaming:

A boy in the 3rd form is suffering child-on-child online abuse from some other boys in his year group through an online gaming platform. When he raises this, his parents and HM say that he is partly to blame for playing the online game with them in the first place.

A girl in the 4th form speaks to her matron because she has shared a nude photo of herself with her ex-boyfriend. The ex-boyfriend is now threatening to show it to all of his friends. Her matron tells her that this happening because she should not have shared the image.

Indirect victim blaming:

A L6th student has just disclosed that she is being sexually harassed by an U6th boy to their tutor. The tutor responds by telling them what *they* should have done differently in that situation in order to keep themselves safe.

A student in the 5th form has been subject to online exploitation and, as a result, has lost £3000. His parents take away his phone every evening from 7pm to prevent this from happening again.

Challenging victim blaming

This should be done in a constructive and supportive way. The following steps will enable everyone who may be involved in an incident of child-on-child abuse to understand the impact of their words and actions.

- Remember the person who has been allegedly harmed lacks control in abusive situations – focus on the tactics or methods that the person alleged to have caused harm used to deceive or used to control the person who has been allegedly harmed .
- Focus on the behaviour of the person alleged to have caused harm, rather than on the behaviour of the person who has been harmed. This ensures that responsibility is placed on the person alleged to have caused the harm.
- Make time for learning and reflection. After every incident, reflect on whether any victim blaming behaviours were identified and how to prevent them in future cases.

Further reading on victim blaming in an online situation can be found in ‘Challenging victim blaming language and behaviours when dealing with the online experiences of children and young people’ (UK Council for Internet Safety) [here](#).

Appendix F: Proactive relationships education

Throughout their journey at Wellington students will have proactive relationship education delivered via the timetabled Wellbeing lessons as well as a programme of tailored external and internal assemblies and workshops as part of 'Relationships Education'. The aim of the Relationship Education programme is to equip students with the skills they need to have successful relationships during their time at Wellington and beyond. A summary of this programme is detailed below.

3rd form

1. Safeguarding and Support Systems
Who the Safeguarding team are and how to reach them
Who to talk to if they feel unsafe
What to do if they are worried about a friend
How to use Whisper
What to do if something goes wrong in a situation
2. Understanding Abuse and Unsafe Behaviour
What child-on-child abuse is
What sexual harassment is
What sexual assault is
How to recognise unsafe behaviour from adults
How to recognise unsafe behaviour from their peers
How to call out inappropriate behaviours from their peers
3. Boundaries, Consent, and Healthy Relationships
Their own personal boundaries
How to respect the boundaries of others
What consent is and why it is important
About making informed decisions about sex
About contraception
4. Risky Behaviours and Their Impact
About smoking and vaping
About alcohol and its effects

4th form

1. Healthy & Unhealthy Relationships
What a healthy romantic relationship looks like
What a coercive, controlling relationship looks like
More details about child-on-child abuse including sexual harassment and sexual assault
What exploitation is (criminal and sexual)
Honor-based violence and FGM
About Violence Against Women and Girls (VAWG)
2. Personal Safety & Global Citizenship
How to keep themselves safe when visiting others in the community (Global Citizenship)
3. Sexual Health & Development
About safe sex; fertility and infertility; menopause
About local sexual health services
About STIs and what to do about them
4. Substance Misuse & Decision Making
The risks of substance misuse; effects of alcohol on decision-making and addiction

5th form

1. Intimate Relationships, Consent & the Law
How to navigate intimate relationships
About a deeper understanding of consent in practical terms
The legal implications of sex and consent
2. Health & Personal Safety
Screening – testicular cancer, smear tests
About festival safety and substance misuse
3. Work & Safety
About employment and safe working conditions
4. Extremism, Mental Health & Online Safety
Violent extremism and links to mental health (to link with the online topic?)

L6th and U6th

1. Legal Rights & Relationship Safety
Their legal rights in terms of consent and relationships
How to recognise intimate relationship abuse
About modern slavery
2. Life Transitions & Social Responsibility
How relationships change when they leave school
How to manage a situation where a friend has been accused of sexual assault
How to be a role model to younger years
Where to go for help (when you don't have the Wellington support network)

Appendix G: Response to sexual violence and harassment in schools (DfE 2021)

Safeguarding Handbook for Schools

*PART FOUR: RESPONSE TO REPORTS

See also KCSIE Part 5

REPORT RECEIVED

(from the victim or third-party)
[Onsite, offsite or online]

Definitions

Sexual Violence

Rape
Assault by penetration
Sexual assault

Sexual Harassment

Unwanted conduct of a sexual nature, including sexual remarks, sexual taunts, physical behaviour or online sexual harassment

Victim reassured

- taken seriously and kept safe; and never be given an impression they are creating
- confidentiality not promised
- listen to victim, non-judgementally
- record the disclosure (facts as reported)
- two staff present (one being the DSL, or reported to DSL as soon as possible)
- victim sensitively informed about referral to other agencies
- if victim does not give consent to share, staff may still lawfully share in order to protect and to promote the welfare of children (see 'Sexual Violence and Sexual Harassment')
- parents of victim informed, unless this would put victim at greater risk.

Anonymity

Note that in cases of sexual violence there is legal protection of the victim's identity. Re includes sharing on social media and discussion amongst pupils in the school.

Record-keeping

Remember, to record all concerns, discussions, decisions and reasons for decisions.

Considerations

(Sexual Violence, Sexual Harassment and Harmful Sexual Behavior)
Immediately: Consider how to support the victim and the alleged perpetrator.

- wishes of the victim
- nature of the alleged incident
- ages of the children
- development stage of the child
- any power imbalance
- one-off, or part of a pattern
- any ongoing risks to victim
- other related issues and wider context

MANAGE INTERNALLY

One-off incidents which the school believes that the child(ren) are not in need of early help or statutory intervention, which would be appropriate to deal with internally under the school's behaviour policy or anti-bullying policy.

EARLY HELP

Non-violent Harmful Sexual Behaviours
(see Harmful Sexual Behaviours Framework (NSPCC))

**REFER TO
SOCIAL CARE**

All incidents where a child has been harmed, is at risk of harm or is in immediate danger.

Social Care staff will decide next steps. Be ready to escalate if necessary.

REFE

All incident penetration
(incl. if perpetrator is a staff member)
Discuss need for a written report, and if not, provide an example, discuss with other staff, if perpetrator is a staff member

RISK ASSESSMENT

Case-by-case basis
(for details see paragraphs 69 and 70
Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, 2021))

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**SAFEGUARD AND SUPPORT VICTIM
AND (ALLEGED) PERPETRATOR**
(see separate page)

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Appendix H:

Child-on-child harm

Support for parents

This document has been put together by the Rainbow Team (Tom Wayman, Deputy Head (Pastoral), Jenny Griggs (Head of Student Mental Health), Delyth Lynch (Director of Safeguarding) and Steph Eldridge Evers (Safeguarding Manager) in order to support parents who have a child involved in the College disciplinary process which has concerned an incident of child-on-child harm: either as a parent of a child who has had harm caused to them or a parent of a child who has allegedly caused harm to another.

We recognise that this can be an enormously difficult time and understanding what may happen and what support might be available to you could be helpful.

An overview of the process

Following an incident of alleged child-on-child harm the College Investigations policy will be followed alongside the Behaviour Management Policy. It may be necessary for this process to be delayed if external agencies have been informed. The College has little discretion in how it deals with these matters if certain thresholds appear to have been met. The College will have no control over the timelines once a referral has been made, something that we appreciate is a frustration for all concerned.

The Safeguarding Team may need to inform the police if a crime has allegedly been committed. This could include cases involving assault, cyber-crime, drugs, harassment, theft and incidents involving weapons.

If a sexual offence has allegedly been committed, Bracknell Forest Local Authority protocols will be followed alongside Keeping Children Safe in Education (Part 5). Under this guidance we have a duty to report certain offences to the police and Children's Social Care.

Whilst circumstances will largely dictate whether a matter has to be reported to the Police, to the extent it is able to, the College will balance the needs of the students involved and the needs of other students and the wider school community. Advice from the Safeguarding Team at Bracknell Forest may be sought on a no-names basis if it is not entirely clear whether the police should be involved and further guidance is required.

The NPCC document ‘When to Call the Police: Guidance for Schools and Colleges’ may also be consulted and can be seen [here](#).

If the police are informed, they should make a referral to Children’s Social Care as they have a duty to report any contact they have with a child aged 18 and under, or who is in full-time education. This is to ensure that all those involved are being offered the support that they are entitled to. Multi-agency working also helps to ensure best practice; professionals will support one another and always put the needs of the child (whether the child has allegedly caused harm or has had harm caused to them) at the centre of any decision making and will also advocate on behalf of the child. In circumstances where the College is concerned that the Police referral to Children’s Social Care may not have been made in a timely manner, the College may also refer to Children’s Social Care.

If the police are not informed, the safeguarding team may inform Children’s Social Care if they feel a child is at risk and may need interventions which are not able to be provided by the College. Again, this referral will be made in a supportive way for the young person to ensure that all relevant avenues of support are in place to help them. This referral will be made by the DSL or Safeguarding Manager and with the consent of the parents.

If the incident has occurred on College site, a referral is made to Bracknell Forest Children’s Social Care. Additional referrals will then be made to the authorities where the young person lives. Should an incident occur elsewhere (for example a student’s home) and in a different local authority, referrals will be made to authorities in this area as well.

Key personnel

There will be several key people involved in the investigations process. Below is a helpful overview of their role in the process.

	Position	Role
Delyth Lynch / Steph Eldridge Eyers	Director of Safeguarding / Safeguarding Manager	External referrals and liaison with external agencies Management of risk within the College (Risk assessments etc)
Tom Wayman	Deputy Head (Pastoral)	To help support students, parents and staff throughout the process with general oversight of the whole process
Jenny Griggs	Head of Student Mental Health	To provide emotional support to students involved and organise counselling from the College counsellors if required and also signpost to any relevant external support if appropriate

A SWiM	Student Wellbeing Mentor	We have a small group of specially trained staff who fulfil this role. Your child will be allocated a SWiM to support them through this period of time. They will work alongside the HM and other internal staff, offering guidance and ensuring that your child understands everything which is happening
Cressida Henderson	Second Master	Disciplinary Investigation and initial communication with parents. Updating the Master about the progress of a case and providing information to the Master
Polly Gutteridge	Assistant Head (Students)	Disciplinary Investigation and support of HMs liaising with parents.
HM	Housemaster / mistress	Liaison with parents (direct point of contact) Support for the young person
Tutor	Tutor	Support young person by providing work (if off school) Keeping in touch Emotional wellbeing and support
James Dahl	Master	Decision maker for major sanctions

Key College policies (available online and on the parent portal):

- Behaviour Management policy
- Child-on-Child Abuse policy (including anti-bullying & sexual misconduct)
- Safeguarding & Child Protection policy
- Investigations policy: can be provided by emailing Viv Taylor: vct@wellingtoncollege.org.uk

External sources of support:

This support document covers the spectrum of harm and applies to all parties. We recognise that both young people and parents may want to seek external support, and we are able to advise on this and signpost, accordingly, depending on the unique needs of the individuals concerned.

Child-on-child sexual harms: <https://www.csacentre.org.uk/research-resources/practice-resources/supporting-parents-and-carers/>

The police and local authority will also provide relevant help and support to parents in order to guide them and also signpost to sources of assistance and guidance.