



# St Paul's School

FOUNDED 1509

## St Paul's School & St Paul's Juniors

### Peer-on-Peer Abuse Policy

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This policy is available on the Handbook page of the School Intranet and policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made by email to [policyquery@stpaulsschool.org.uk](mailto:policyquery@stpaulsschool.org.uk)

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## **1. Safeguarding Statement**

The School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued and to always consider the best interests of the child. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. We operate within a culture of openness and recognise and accept that abuse can happen in any organisation.

## **2. Introduction**

The Governors, Senior Leadership Team, and all staff and volunteers at St Paul's School and St Paul's Juniors (hereafter, 'the School') are committed to the prevention, early identification and appropriate management of peer-on-peer abuse (as defined below) both within and beyond the School.

In particular, we:

- believe that in order to protect children, all schools should
  - be aware of the level and nature of risk to which their pupils are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context; and
  - take a contextual whole-school approach to preventing and responding to peer-on-peer abuse;
- regard the introduction of this policy as a preventative measure, and do not feel it is acceptable merely to take a reactive approach to peer-on-peer abuse in response to alleged incidents of it;
- recognise national and increasing concern about this issue, and wish to implement this policy in order to ensure that our pupils are safe; and
- encourage parents to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any of their peers, they should inform the School so that it can ensure that appropriate and prompt action is taken in response.

## **3. This policy:**

- sets out the School's strategy for preventing, identifying and appropriately managing peer-on-peer abuse.
- applies to all staff including Governors, members of the School's Executive, staff, volunteers, contractors, etc. It will be reviewed as may be required, at least annually, to ensure that it continually addresses the risks to which pupils are, or may be, exposed. A number of staff and pupils will be involved in each annual review, which involves and is informed by an assessment of the impact and effectiveness of this policy over the previous year;
- is the School's overarching policy for any issue that could constitute peer-on-peer abuse. It relates to, and should be read alongside, the School's Safeguarding and Child Protection Policy and Procedures and any other relevant policies including, but not limited to, Anti-bullying (including cyber-bullying), Youth produced sexual imagery, eSafety, Missing Pupil Procedures, Pupil behaviour policies (SPS and SPJ);
- does not use the term 'victim' and/or 'perpetrator'. This is because our School takes a safeguarding approach to all individuals involved in allegations of or concerns about peer-on-peer abuse, including those who are alleged to have been abused and those who are alleged to

have abused their peers, in addition to any sanctioning work that may also be required for the latter. Research has shown that many children who present with harmful behaviour towards others, in the context of peer-on-peer abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers;<sup>1</sup>

- uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18. We have nonetheless chosen not to restrict our approach to peer-on-peer abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all pupils, regardless of age.
- Although the starting point is that the School's response to peer-on-peer abuse should be the same for all pupils, regardless of age, there may be some additional considerations in relation to a pupil aged 18 or over in terms of how local agencies and/or partners respond. This, for example, is likely to be different on the part of local authorities, given that their safeguarding duties are limited, in the case of children's social care services - save for a number of specific exceptions<sup>2</sup> - to children and, in the case of adult social care services, to adults with care and support needs. Similarly, the School's response to incidents involving the exchange of youth produced sexual imagery will necessarily differ depending on the age of the pupils involved – see Appendix C for further information. There is also likely to be a more significant criminal justice response in relation to any pupil responsible for abuse who is aged 18 or over;
- is compliant with the statutory guidance on peer-on-peer abuse as set out in *Keeping Children Safe in Education* (2020);
- should, if relevant according to the concerns/allegations raised, be read in conjunction with the DfE's advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE's Advice) (December, 2017), and any other advice and guidance referred to within it, as appropriate;
- should be read in conjunction with the Local Safeguarding Partnership Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

#### **4. Definition of peer-on-peer abuse**

For these purposes, peer-on-peer abuse is 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). Peer-on-peer abuse can take various forms, including: serious bullying(including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour (including upskirting), and/or gender-based violence.

These types of 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.

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<sup>1</sup> <https://www.nspcc.org.uk/globalassets/documents/research-reports/child-abuse-neglect-uk-today-research-report.pdf> (see, in particular, Section 5)

<sup>2</sup> For example, young people aged 18 or over who are eligible for care leaving services

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 peer-on-peer abuse therefore needs to consider the range of possible types of peer-on-peer abuse set out above and capture the full context of children's experiences.<sup>3</sup> This can be done by adopting a Contextual Safeguarding approach and by ensuring that our response to incidents of peer-on-peer abuse takes into account any potential complexity.

## **5. Definition of Contextual Safeguarding**

This policy encapsulates a Contextual Safeguarding approach, which:

- 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;
- 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; and
- considers interventions to change the systems or social conditions of the environments 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, gendered school cultures, thus improving the pre-existing school environment.<sup>4</sup>

## **6. When does behaviour become problematic or abusive?<sup>5</sup>**

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

## **7. Harmful sexual behaviours**

"Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. All staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour. Both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is harmful sexual behaviours or HSB." - NSPCC

Harmful sexual behaviours are further 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."<sup>6</sup>

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<sup>3</sup> Carlene Firmin and George Curtis, MsUnderstood Partnership (2015), Practitioner Briefing #1: What is peer-on-peer abuse? (MSU 2015)

<sup>4</sup> Firmin, C. 2017 Contextual Safeguarding: An overview of the operational, strategic and conceptual framework Luton: University of Bedfordshire

<sup>5</sup> Please see, for example, London Safeguarding Children Board, London Child Protection Procedures, Part B3: Practice Guidance, Section 15. Children Harming Others:  
[http://www.londoncp.co.uk/chapters/ch\\_harm\\_others.html](http://www.londoncp.co.uk/chapters/ch_harm_others.html)

<sup>6</sup> Ibid, page 12 - which cites reference to the above mentioned definition of harmful sexual behaviours as having been derived from Hackett, 2014

Simon Hackett has proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a pupil's sexual behaviour and deciding how to respond to it.<sup>7</sup>

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> <li>• Developmentally expected</li> <li>• Socially acceptable</li> <li>• Consensual, mutual, reciprocal</li> <li>• Shared decision making</li> </ul>	<ul style="list-style-type: none"> <li>• Single instances of inappropriate sexual behaviour</li> <li>• Socially acceptable behaviour within peer group</li> <li>• Context for behaviour may be inappropriate</li> <li>• Generally consensual and reciprocal</li> </ul>	<ul style="list-style-type: none"> <li>• Problematic and concerning behaviour</li> <li>• Developmentally unusual and socially unexpected</li> <li>• No overt elements of victimisation</li> <li>• Consent issues may be unclear</li> <li>• May lack reciprocity or equal power</li> <li>• May include levels of compulsivity</li> </ul>	<ul style="list-style-type: none"> <li>• Victimising intent or outcome</li> <li>• Includes misuse of power</li> <li>• Coercion and force to ensure compliance</li> <li>• Intrusive</li> <li>• Informed consent lacking or not able to be freely given</li> <li>• May include elements of expressive violence</li> </ul>	<ul style="list-style-type: none"> <li>• Physically violent sexual abuse</li> <li>• Highly intrusive</li> <li>• Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour</li> <li>• Sadism</li> </ul>

Hackett's continuum relates exclusively to sexual behaviour and is not exhaustive. The Brook Sexual Behaviours Traffic Light Tool can also be very helpful in identifying sexual behaviours by children.<sup>8</sup> Staff should always discuss any concerns with the DSL (or, in their absence, a Deputy DSL). Where an (alleged) incident involves a report of sexually harmful behaviour the DSL must be informed.

## 8. Other behaviour

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:

- is socially acceptable
- involves a single incident or has occurred over a period of time
- is socially acceptable within the peer group
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning

<sup>7</sup> Ibid, page 14

<sup>8</sup> Learning project briefing on the role of schools in preventing, and responding to, peer-on-peer abuse

- involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power
- involves a misuse of power

In addition, the School could be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional, physical behaviour and digital behaviour.

Staff should recognise that the same behaviour presented by different children might be understood at different points on a spectrum, depending on the particular context. For example, an incident involving youth produced sexual imagery may be inappropriate in one context, for example, when exchanged between two children in a consenting relationship, and abusive in another, for example, when it is (a) shared without the consent of the child in the image; (b) produced as a result of coercion; or (c) used to pressure the child into engaging in other sexual behaviours.

Behaviour which is not abusive at first may potentially become abusive quickly or over time. 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 children may not constitute peer-on-peer 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 pupil basis, but could also apply across the pupil body.

Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which the School may need to take a whole-school approach in order to prevent escalation. For example, where multiple pupils are making inappropriate comments about another child, 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;
- revising the School's RSE programme;
- a discussion around whether anything is happening within the wider community that might be affecting the pupils' behaviour.

It will also be important to consider the wider context in which the alleged behaviour is reported to have occurred, and which may trigger the need for a referral. For example, some behaviour that is considered inappropriate may be capable of being dealt with internally. However, 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 /allegation, is considered or suspected by the DSL to constitute peer-on-peer abuse, the School will follow the procedures set out in the Safeguarding and Child Protection Policy and Procedures.

## **9. Identifying peer on peer abuse**

All staff should be alert to the well-being of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However,

staff should 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.

Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse (Appendix 1 of the Safeguarding and Child Protection policy details types and signs of abuse) and can include (source: NSPCC):

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected;
- physical injuries;
- experiencing difficulties with mental health and/or emotional wellbeing;
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much;
- broader changes in behaviour including alcohol or substance misuse;
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- abusive behaviour towards others.

Abuse affects children very differently. 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. Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers 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 should always 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 peer-on-peer 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.

Any child can be vulnerable to peer-on-peer abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to peer-on-peer abuse due to how others now perceive them, regardless of any characteristics, which may be inherent in them and/or their family.

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 peer-on-peer abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers.



Research suggests that peer-on-peer 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.<sup>9</sup> Barriers to disclosure will also be different. As a result, the School will regularly review gender dynamics of peer-on-peer abuse within its settings, and recognise that these will play out differently in single sex environment, as compared to a mixed or gender imbalanced setting.

## **10. School culture and environment**

The School actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by:

- Educating all staff, pupils, and parents about this issue. This includes:
  - training staff on the nature, prevalence and effect of peer-on-peer abuse, and how to prevent, identify and respond to it. This includes (a) Contextual Safeguarding; (b) the identification and classification of specific behaviours; and (c) the importance of taking seriously all forms of peer-on-peer abuse (no matter how low level they may appear) and ensuring that no form of peer-on-peer abuse is ever dismissed as horseplay or teasing. Training includes case studies, which the staff design themselves;
  - educating children about the nature and prevalence of peer-on-peer abuse via PSHE and the wider curriculum. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. Pupils are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of peer-on-peer abuse.
- engaging parents on this issue by:
  - talking about it with parents, both in groups and one to one;
  - asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks;
  - involving parents in the review of School policies and lesson plans.
- ensuring that all peer-on-peer abuse issues are fed back to the DSL so that they can identify and address any concerning trends and pupils who may be in need of additional support.
- challenging the attitudes that underlie such abuse (both inside and outside the classroom);
- working with staff, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community;
- creating conditions in which our pupils can aspire to and realise safe and healthy relationships;
- creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to; and responding to cases of peer-on-peer abuse promptly and appropriately.

## **11. Multi-agency working**

The School actively engages with its local partners in relation to peer-on-peer abuse, and works closely with, for example, Richmond LSCB, children's social care, the police and/or other relevant agencies, and other schools.

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<sup>9</sup> Barter C, McCarry M, Berridge D and Evans K, Partner exploitation and violence in teenage intimate relationships (2009) <https://www.nspcc.org.uk/globalassets/documents/research-reports/partner-exploitation-violence-teenage-intimate-relationships-report.pdf>

The relationships the School has built with these partners are essential to ensuring that the School is able to prevent, identify early and appropriately handle cases of peer-on-peer abuse. They help the School (a) to develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist; (b) to ensure that our pupils are able to access the range of services and support they need quickly; (c) to support and help inform our local community's response to peer-on-peer abuse; (d) to increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our pupils.

The School actively refers concerns/allegations of peer-on-peer abuse where necessary to the police and children's social care. This is particularly important because peer-on-peer 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.

## **12. Responding to concerns or allegations of peer-on-peer abuse**

It is essential that all concerns/allegations of peer-on-peer abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our School culture and environment.

Any response should:

- include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);
- 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, they may also have considerable unmet needs and be at risk of harm themselves. The School 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, and additional sanctioning work may be required for the latter;
- take into account:
  - that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider socio-cultural contexts - such as the child's/children's peer group (both within and outside the School); family; the School environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child's/children's needs and to mitigate risk; and
  - the potential complexity of peer-on-peer abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting;
  - the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL will usually discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made. The DSL 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.

**13. What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?**

If a pupil is in immediate danger, or at risk of significant harm, a referral to children's social care (if the pupil is aged under 18) and/or the police should be made immediately. Anyone can make a referral. Where referrals are not made by the DSL (or a Deputy DSL), the DSL should be informed as soon as possible that a referral has been made (in accordance with the Safeguarding and Child Protection policy).

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay (in accordance with the Safeguarding and Child Protection policy) so that a course of action can be agreed.

If a child speaks to a member of staff about peer-on-peer 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. Further details on responding to disclosures is included in the Safeguarding and Child Protection Policy.

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 safety of the child/all children affected.

DSLs will use their professional judgement to determine whether it is appropriate for the alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL will 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 will contact Children's Social Care immediately, and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the allegations/concerns with CSC and agree on a course of action, which may include:

**A - Manage internally with help from external specialists where appropriate and possible**

Where behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the School may need to handle allegations/concerns internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).

**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 for a section 17 and/or 47 statutory assessment**

As a matter of best practice, if an incident of peer-on-peer abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every

professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.

#### **D – Report alleged criminal behaviour to the Police**

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 youth produced sexual imagery does not involve any aggravating factors (please see Appendix C below). All concerns/allegations will be assessed on a case-by-case basis, and in light of the wider context.

### **14. Individual risk and needs assessment**

Where there is an incident of peer-on-peer abuse, the School will carry out a robust risk and needs assessment in respect of each child affected by the abuse. These risk assessments will:

- assess and address the nature and level of risks that are posed and/or faced by the child;
- engage the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the long term.
- consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child; and
- 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.

If at any stage the child's needs escalate, the DSL (or Deputy DSL) will refer the situation to CSC again to determine the appropriate course of action.

### **15. Disciplinary action**

The School will consider whether disciplinary action may be appropriate for any child/children involved – any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including:

- (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;
- (b) to demonstrate to the child/children and others that peer-on-peer abuse can never be tolerated; and
- (c) to ensure the safety and wellbeing of other children.

However, these considerations will be balanced against the child's/children's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action the School 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 peer-on-peer abuse and the causes of it.

The School will, where appropriate, consider the potential benefit, as well as challenge, of using 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.

Expulsion will usually only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the School. Disciplinary interventions alone are rarely

able to solve issues of peer-on-peer abuse, and the School will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

## **16. On-going proactive work to a contextual whole-school approach**

The School's response to concerns/allegations of peer-on-peer abuse forms part of on-going proactive work by the School to embed best practice and take a contextual whole-school approach to such abuse. As such the School's response can become part of its wider prevention work.

In addition, the School will review the context in which any incident of peer-on-peer abuse occurred in the School, the local community in which the School is based, and the wider physical and online environment, including consideration of the following questions:

- (a) what protective factors and influences exist within the School (such as positive peer influences, examples where peer-on-peer abuse has been challenged etc.) and how can the School bolster these?;
- (b) how (if at all) did the School's physical environment contribute to the abuse, and how can the School address this going forwards, for example by improving the School's safety, security and supervision?;
- (c) did wider gender norms, equality issues and/or societal attitudes contribute to the abuse?;
- (d) what was the relationship between the abuse and the cultural norms between staff and pupils, and how can these be addressed going forwards?;
- (e) does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse?;
- (f) how have similar cases been managed in the past and what effect has this had?;
- (g) does the case or any identified trends highlight areas for development in the way in which the School works with children to raise their awareness of and/or prevent peer-on-peer abuse, including by way of the School's PSHE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work?;
- (h) are there any lessons to be learnt about the way in which the School engages with parents to address peer-on-peer abuse issues?;
- (i) are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?;
- (j) does this case highlight a need to work with certain children to build their confidence and teach them how to identify and manage abusive behaviour?; and
- (k) were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the School?

Answers to these questions are developed into an action plan that is reviewed on a regular basis by school leadership and the DSL.

## Appendix A – Further Resources

### Peer-on-peer abuse statistics

- The crime survey data from 2013:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/214970/sexualoffending-overview-jan-2013.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/214970/sexualoffending-overview-jan-2013.pdf).

This includes information around sexual violence; and street based violence perpetrated by young men.

- NSPCC: <https://www.nspcc.org.uk/globalassets/documents/research-reports/partner-exploitation-violenceteenage-intimate-relationships-report.pdf>

This 2009 report explores partner exploitation and violence in teenage intimate relationships.

- The Centre for Social Justice:

<http://www.centreforsocialjustice.org.uk/core/wp-content/uploads/2016/11/Bullying-RT-Report-1.pdf>

This 2016 roundtable report looks at how the education sector can best support children who self-exclude due to bullying. It sets out a number of important statistics.

- Parliament publication:

<https://publications.parliament.uk/pa/cm201617/cmselect/cmwomeq/91/9105.htm>

This 2016 publication examines the scale and impact of sexual harassment and sexual violence in schools.

### Identifying, assessing and responding to behaviour

The following links are designed to help professionals working with children to identify, categorise and respond appropriately to sexual behaviours by children:

- NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework:

<https://www.nspcc.org.uk/services-and-resources/research-and-resources/2016/harmful-sexualbehaviour-framework/>, which contains the continuum model proposed by Simon Hackett (2010), and provides schools with information about what to expect from local partnerships.

- NSPCC guidance on the stages of normal sexual behaviour: <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/healthy-sexual-behaviourchildren-young-people/>

- NSPCC: <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmful-sexualbehaviour/research-resources/>

- Brook Sexual Behaviours Traffic Light Tool: <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool>

Here is a Fair Access Panel Referral form to capture peer-on-peer abuse as a reason for a move or exclusion, and accompanying practitioner video.

### Educating staff and children

- Serious Youth Violence – Home Office 'This is abuse campaign for schools':

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/410010/2015-03-08\\_This\\_is\\_Abuse\\_campaign\\_summary\\_report\\_2\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/410010/2015-03-08_This_is_Abuse_campaign_summary_report_2_.pdf)

- New youth produced imagery guidance:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/947545/UKCIS\\_sharing\\_nudes\\_and\\_semi\\_nudes\\_advice\\_for\\_education\\_settings\\_V2.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/947545/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings_V2.pdf)

- Anti-bullying guidance:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/623895/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf)

- Cyber bullying: <http://www.childnet.com/ufiles/Cyberbullying-guidance2.pdf>

- Learning project briefing on the role of schools in preventing, and responding to, peer-on-peer abuse

- AVA Prevention platform has produced guidance for schools on how to develop [pupils'/students'] understanding and skills to prevent violence against women and girls (VAWG):

<http://www.preventionplatform.co.uk/>

- Tender works with schools providing educational programmes for children and staff training aimed at preventing domestic abuse and sexual violence and promoting healthy relationships based on equality and respect: <http://tender.org.uk/>

- Childnet: <http://www.childnet.com/resources/pshetoolkit>

### **Support and interventions**

- The charity, the Lucy Faithful Foundation (LFF), provides services to agencies working with children and their families – for those with problematic sexual behaviour on the internet and in the ‘real world’: [http://www.lucyfaithfull.org.uk/files/inform\\_yp\\_agencies\\_leaflet.pdf](http://www.lucyfaithfull.org.uk/files/inform_yp_agencies_leaflet.pdf).

LFF also provides information for parents and carers of children:

[http://www.lucyfaithfull.org.uk/files/inform\\_yp\\_parents\\_leaflet.pdf](http://www.lucyfaithfull.org.uk/files/inform_yp_parents_leaflet.pdf).

- Red Balloon Learning Centres: <http://www.redballoonlearner.org/>

- Leap Confronting Conflict: <http://www.leapconfrontingconflict.org.uk/>

- Barnardo's: [https://www.barnardos.org.uk/what\\_we\\_do/our\\_work/sexual\\_exploitation/cse-professionals/csecan-you-see-it.htm](https://www.barnardos.org.uk/what_we_do/our_work/sexual_exploitation/cse-professionals/csecan-you-see-it.htm)

### **General**

- Contextual Safeguarding Practitioners’ Network: [www.contextualsafeguarding.org.uk](http://www.contextualsafeguarding.org.uk)

## **Appendix B – Youth Produced Sexual Imagery/'Sharing nudes and semi-nudes'**

This part of the policy covers the sharing of sexual imagery by children. Creating and sharing sexual photos and videos of under-18s is illegal, and therefore causes the greatest complexity for schools (amongst other agencies) when responding. It also presents a range of risks, which need careful management. On this basis, this part of the policy introduces the phrase 'youth produced sexual imagery' and uses this or 'sharing nudes or semi-nudes' instead of 'sexting' as per the most recent government guidance: 'Sharing nudes and semi-nudes': Advice for education settings (Dec 2020), created by the UK Council for Internet Safety.

### **Definitions**

Government advice uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

Many professionals may refer to the sending of 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18. Further guidance on the law can be found in section 1.7
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes
- Terms such as 'revenge porn' and 'upskirting'<sup>6</sup> are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

### **What types of incidents are covered by this policy?**

- A child creates and shares sexual imagery of themselves with a peer (under the age of 18).
- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult.
- A child is in possession of sexual imagery created by another child.

### **The following do not constitute youth produced sexual imagery:**

- The sharing of sexual imagery of children by adults constitutes child sexual abuse and schools should always inform the police.
- Children sharing adult pornography or exchanging sexual texts, which do not contain imagery.<sup>10</sup>
- Sexual imagery downloaded from the internet by a child.<sup>11</sup>

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<sup>10</sup> All such incidents should be responded to with reference to the School's [online safety policy], and in line with the School's child protection policy

<sup>11</sup> Ibid



- Sexual imagery downloaded from the internet by a child and shared with a peer (under the age of 18) or an adult.<sup>12</sup>

## **Disclosure**

Disclosure about youth produced sexual imagery can happen in a variety of ways. The child affected may inform a class teacher, the DSL in School, or any member of the School staff. They may report through an existing reporting structure, or a friend or parent may inform someone in School or colleague, or inform the police directly.

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. This will be covered within staff training and within the School's child protection policy.

Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in School is a last resort and they may have already tried to resolve the issue themselves.

## **Handling incidents**

All incidents involving youth produced sexual imagery or the sharing of nudes/semi-nudes should be responded to in line with the School's child protection policy.

When an incident involving youth produced, sexual imagery comes to a member of staff's attention:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate School staff.
- The DSL will follow the procedures and guidance set out in school policy, referring to [Sharing nudes and semi-nudes: Advice for education settings working with children and young people; Responding to incidents and safeguarding children and young people](#).
- There should be subsequent interviews with the children involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm.
- At any point in the process if there is a concern a child has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

## **Education**

Teaching about safeguarding issues in the classroom can prevent harm by providing children with skills, attributes and knowledge to help them navigate risks. The School will provide children with opportunities to learn about the issue of youth produced sexual imagery, as part of its commitment to ensure that they are taught about safeguarding, including online, through teaching and learning opportunities – as also referred to in the School's e-safety policy.

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<sup>12</sup> Ibid

