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Keeping Children Safe in Education

Child Protection and Safeguarding Behaviour and Anti-Bullying Policy

Child on Child Abuse

1. Purpose and status

High Ercall Primary School is committed to preventing, identifying and responding promptly and appropriately to all forms of child-on-child abuse. This policy forms part of the school's child protection arrangements and must be read with the Child Protection and Safeguarding Policy. It reflects Keeping Children Safe in Education (KCSIE) 2026, which comes into force on 1 September 2026.

Child-on-child abuse is a safeguarding issue for the child who has experienced or reported harm and for the child alleged to have caused harm. It can be preventable. Early identification, skilled intervention and evidence-informed support can reduce escalation and improve outcomes for all children.

The school adopts a zero-tolerance approach to abuse. This means that abusive behaviour is never ignored, normalised or passed off as 'banter', 'just having a laugh', 'part of growing up', 'boys being boys' or similar. Zero tolerance does not mean a single automatic sanction; responses will be safeguarding-led, proportionate, lawful, developmentally informed and focused on safety, accountability, learning and support.

2. Core principles

- It could happen here. A lack of reports does not mean abuse is not occurring or is not being disclosed.
- Children may abuse other children inside or outside school, on journeys to and from school, in the community and online. Online and offline harm often overlap.
- All concerns and reports will be taken seriously. Children will be listened to, reassured, supported and kept safe. No child will be made to feel ashamed or blamed for reporting.
- The child's best interests, wishes and feelings will be considered, while recognising that the school may need to share information to protect them or others.
- The school will not investigate in a way that risks contaminating evidence. Staff will record and refer; the DSL will coordinate the response and seek advice from statutory agencies when required.
- Support and safeguarding will be provided to all affected children, including witnesses, friends, siblings and the wider peer group where appropriate.
- The school will comply with the Equality Act 2010, the Public Sector Equality Duty, SEND duties and data protection law.

3. Definition and forms of child-on-child abuse

Child-on-child abuse is harmful behaviour by one or more children towards another child or group of children. It may be physical, sexual, emotional, discriminatory, coercive, exploitative or financially abusive. It may occur within friendships, intimate relationships, peer groups or wider associations and may be a single serious incident or a pattern.

It includes, but is not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- abuse in intimate personal relationships between children, including controlling or coercive behaviour and stalking;
- physical assault or harm, or threats of harm including threats involving a weapon;
- harmful sexual behaviour, sexual harassment and sexual violence, including misogyny or misandry;
- causing or pressuring someone to engage in sexual activity without consent;
- consensual or non-consensual making or sharing of nudes and semi-nudes, including digitally altered, AI-generated or 'deepfake' imagery;
- upskirting and other image-based sexual abuse;
- sexualised online bullying, unwanted sexual messages, exposure to pornography, coercion, blackmail or financially motivated sexual extortion;
- initiation or hazing-type violence, harassment, abuse or humiliation;
- financial abuse, extortion, exploitation or coercive control.

4. Harmful sexual behaviour: a continuum

Children's sexual behaviour exists on a continuum from developmentally expected behaviour to inappropriate, problematic, abusive or violent behaviour. Harmful sexual behaviour (HSB) can occur at any age, including in primary school, face-to-face, online or both. It must always be considered in a child protection context.

The DSL's assessment will consider:

- the age, understanding, developmental stage and SEND or communication needs of every child involved;
- whether behaviour was freely agreed, wanted and understood, including the presence or absence of consent;
- coercion, pressure, intimidation, secrecy, grooming, exploitation or threats;
- differences in power, status, size, ability, popularity, access to information or social influence;
- frequency, pattern, escalation, planning, intent and the impact on the child and wider group;
- the location and context, including online platforms, group chats, journeys, toilets, changing areas, playgrounds and less supervised times;
- whether the behaviour may constitute a criminal offence or indicate that a child has experienced abuse or trauma.

A child cannot consent to sexual activity where the law does not permit it. Even where children describe image sharing or other behaviour as consensual, a safeguarding response is required and the DSL will consider age, development, vulnerability, coercion and risk.

5. Children who may face additional barriers or heightened risk

Any child can experience or cause harm. Staff will be especially alert to barriers affecting children who:

- have SEND, disabilities, medical conditions or communication needs;
- are socially isolated, have experienced bullying, are young carers or have mental health needs;
- are lesbian, gay or bisexual, are questioning their sexuality, or are perceived by others to be different;
- experience racism, sexism, misogyny, misandry, faith-based prejudice or other discrimination;
- have experienced abuse, neglect, domestic abuse, exploitation, trauma or disrupted care;
- are frequently absent, suspended, on part-time timetables or at risk of exclusion;
- have limited English, lack trusted relationships or fear consequences of reporting.

Additional barriers for children with SEND may include assumptions that behaviour or distress relates to their condition, communication difficulties, peer isolation and a greater risk of disproportionate impact. Reasonable adjustments will be made to reporting, assessment and support.

6. Prevention and whole-school culture

The school will minimise risk and build a safe culture by:

- promoting respectful, inclusive relationships and challenging sexism, sexualised language, racism, homophobia, ableism and other discriminatory behaviour;
- teaching age-appropriate Relationships Education and Health Education from September 2026, including friendship, boundaries, privacy, permission-seeking, personal space, respectful behaviour, online safety, recognising unsafe situations and how to seek help;
- teaching children that they have the right to be safe and the responsibility to respect the safety and dignity of others;
- using developmentally appropriate language and avoiding frightening, victim-blaming or shame-based education;
- providing multiple, well-promoted and accessible ways to report concerns and regularly checking through pupil voice that children understand and trust them;
- identifying higher-risk locations and times and adapting supervision, routines, site arrangements and online controls;
- maintaining appropriate filtering and monitoring in line with current DfE standards, including documented checks and consideration of risks arising from generative AI;
- training staff to identify early signs, respond to disclosures, understand Harmful Sexual Behaviour and avoid minimising behaviour;
- engaging parents and carers in prevention and online-safety education;
- analysing anonymised safeguarding, behaviour and bullying information to identify patterns and evaluate impact.

7. Reporting routes for children

Children may report to any trusted adult. They may also speak directly to the DSL or a deputy and use any additional reporting route promoted by the school. Reporting arrangements will be explained in child-friendly language and adapted for children's age, SEND, communication, sensory, language and cultural needs.

Staff will be alert to indirect reports, changes in behaviour, friendship concerns, anonymous information, online content and information from parents or other children. A child does not need to use safeguarding terminology or provide a complete account before the school acts.

8. What staff must do

1. Ensure immediate safety and seek urgent medical help or call 999 where there is immediate danger.
2. Listen calmly and take the child seriously. Use open prompts only; do not ask leading, repeated or investigative questions.
3. Do not promise confidentiality. Explain that information will be shared only with people who need to help keep children safe.
4. Reassure the child that reporting was the right thing to do and that they are not to blame.
5. Record the child's words and the facts promptly on CPOMS, distinguishing observation, disclosure and professional opinion.
6. Report immediately to the DSL or a deputy. Do not wait until the end of the day.
7. Do not mediate, arrange a confrontation, require an apology or ask the children to give accounts together.
8. Do not search a personal device, intentionally view, copy, print, save, screenshot, forward or ask a child to send nude or semi-nude imagery. Secure the situation and refer to the DSL.

9. DSL initial response and decision-making

The DSL or deputy will:

- make an immediate assessment of safety, welfare, medical needs, risk of further harm and risk to other children;
- consider the child's wishes and feelings and use language the child is comfortable with;
- decide whether a written risk-and-needs assessment and safety/support plan is required; for reports of sexual violence, this will be immediate;
- consider the wider context, including school culture, locations, peer groups, journeys and online environments;
- check relevant safeguarding, attendance, behaviour and SEND information on a strict need-to-know basis;
- consider consultation or referral to Family Help, Family Connect/children's social care, police, health or specialist services;
- record decisions, reasons, agency advice, parental decisions, support and review dates;
- ensure that the response does not disadvantage the child who has reported harm or require them automatically to change class, routine or activities.

Possible responses include school-based safeguarding and behaviour action, community-based or targeted Family Help, referral to local authority children's social care, and reporting to police. These are not mutually exclusive and may take place together.

10. Referrals to children's social care and police

The DSL will follow the current Shropshire threshold document, West Midlands child protection procedures and local referral arrangements. A referral to children's social care will be made where a child is suffering or likely to suffer significant harm, may be a child in need, or where specialist assessment/support is required.

Police will be contacted where there is immediate danger, a serious offence, a weapon, rape or assault by penetration, or where police advice/investigation is required. Other potentially criminal incidents will be considered case by case using KCSIE, local protocols and 'When to call the police' guidance. The school will not apply an automatic police referral solely because a child has reached the age of criminal responsibility.

Where police or social care are involved, the school will coordinate its safeguarding and disciplinary actions with them. The absence of a criminal charge, prosecution or conviction does not prevent the school from taking safeguarding, support or behaviour action using the civil standard of proof where appropriate.

11. Parents and carers

Parents and carers will normally be informed and involved at an early stage. The DSL may delay or decide not to inform a parent where there is reason to believe this would place a child at risk, lead to evidence being lost, prejudice an investigation, or conflict with advice from children's social care or police. The decision and rationale will be recorded.

The school will communicate separately with each family, preserve confidentiality and avoid sharing information about another child beyond what is lawful and necessary.

12. Risk-and-needs assessment and safety planning

The assessment and plan will consider:

- the protection, wellbeing, educational access and support needs of the child who has experienced or reported harm;
- the safety, needs, vulnerabilities, accountability and support of the child alleged to have caused harm;
- the safety and needs of other children, siblings, witnesses, friendship groups and staff;
- contact arrangements, supervision, movement around school, transport, clubs, toilets/changing arrangements and online contact;
- reasonable adjustments and support for SEND, communication and mental health needs;
- actions by external agencies and any conditions or restrictions;
- named responsible staff, timescales, review dates and how children and parents will contribute.

Plans will be proportionate, shared only with those who need to implement them, and reviewed whenever circumstances change. They do not replace professional assessments by social care, police, health or specialist HSB services.

13. Supporting the child who has experienced or reported harm

- A trusted adult and regular check-ins, with choices about who provides support.
- Immediate and ongoing safety measures, including online-safety and image-removal support where applicable.
- Pastoral, mental health, SEND, medical or specialist support and referrals as appropriate.
- Support for attendance, concentration and learning, including reasonable adjustments without lowering aspirations.
- Protection from retaliation, bullying, victim-blaming, gossip and repeated questioning.
- Careful management of contact with the child alleged to have caused harm.
- Regular review with the child; support will not end simply because an investigation or sanction has concluded.

14. Supporting the child alleged to have caused harm

The school will maintain a safeguarding approach while making clear that harmful behaviour is unacceptable. Support does not remove accountability. The response will consider whether the child has unmet needs, SEND, trauma, exposure to abuse, pornography, coercion, exploitation or other risks.

- A clear explanation of concerns and expectations, using developmentally appropriate language.
- A safety/support plan, supervision and boundaries as required.
- Assessment and referral for HSB, mental health, SEND, Family Help or social-care support.
- Restorative work only when safe, voluntary, properly assessed and not used in place of safeguarding or disciplinary action.
- Appropriate behaviour consequences, education and reparation, coordinated with external agencies.
- Protection from public labelling, retaliation and unnecessary disclosure.

15. Behaviour, sanctions, suspension and exclusion

Safeguarding action and behaviour action are related but distinct. The school may apply proportionate sanctions in line with the Behaviour Policy, taking account of SEND, disability, age, vulnerability, context and agency advice. Sanctions will not be used as a substitute for safeguarding assessment or support.

Suspension or permanent exclusion may be considered only by the headteacher and in accordance with the statutory guidance in force from 26 July 2026. Permanent exclusion is a last resort. Any decision will be lawful, reasonable, fair and based on the individual circumstances. The educational and safeguarding needs of all children will continue to be addressed.

16. Making or sharing nudes and semi-nudes, including AI-generated imagery

Every incident involving the making or sharing of nude or semi-nude images, videos or livestreams by or of a person under 18 requires a safeguarding response, whether described as consensual or non-consensual. This includes altered, synthetic, AI-generated, 'deepfake' or 'deep nude' content.

The DSL will follow the current UKCIS advice. In particular:

- staff must not intentionally view, copy, print, save, forward or ask for the imagery;
- the DSL will assess coercion, exploitation, adult involvement, age, development, motivation, distribution, impact and immediate risk;
- parents will normally be informed early unless doing so would create risk;
- children's social care and/or police will be contacted immediately where a child has been harmed or is at immediate risk, an adult is involved, there is coercion, malicious distribution, blackmail or other serious concern;
- any device search or deletion will be authorised and managed in accordance with the school's searching/confiscation arrangements and UKCIS advice;
- the school will support reporting to platforms and appropriate image-removal services.

17. Recording, confidentiality and information sharing

All records will be clear, factual, timely and secure. They will distinguish observed facts, the child's account, professional opinion and information from others. Records will include the concern, immediate safety action, child voice, decisions and reasons, referrals/advice, parent communication, risk/support plans, outcomes and reviews.

Information will be shared lawfully, proportionately and on a need-to-know basis to safeguard children. The DSL will not allow data protection concerns to prevent necessary safeguarding information sharing.

18. Monitoring, learning and governance

The DSL will review anonymised information to identify:

- patterns by time, location, year group, protected characteristic, SEND, friendship group or online platform;
- repeat concerns, escalation, retaliation, under-reporting or disproportionate impact;
- lessons for supervision, curriculum, staff training, filtering/monitoring and site management;
- whether reporting systems and support are understood, accessible and trusted.

The governing body will receive appropriate anonymised assurance about prevalence, response, trends, training and policy implementation. Governors will not receive information that unnecessarily identifies children.

19. Staff training

All staff, including staff who do not work directly with children, will read Part 1 of KCSIE 2026. Staff will receive safeguarding and child protection training at induction and regular updates at least annually. Training will include child-on-child abuse, HSB, sexual harassment and violence, online abuse, nude-image incidents including AI-generated imagery, accessible reporting, recording, filtering and monitoring, and local referral pathways.

The DSL and deputies will maintain suitable specialist knowledge and will seek supervision, consultation or specialist HSB advice where needed.

20. Related policies and documents

- Child Protection and Safeguarding Policy
- Behaviour Policy and Anti-Bullying Policy
- Online Safety and Acceptable Use arrangements
- Relationships Education / RSHE Policy
- SEND Policy and Accessibility Plan
- Searching, Screening and Confiscation arrangements

- Suspension and Permanent Exclusion Policy
- Staff Code of Conduct and Whistleblowing Policy
- Complaints Policy

Key sources

- Department for Education, Keeping Children Safe in Education 2026 (in force from 1 September 2026), especially Parts 1, 2 and 5 and Annex C.
- Department for Education, Working Together to Safeguard Children 2026.
- Department for Education, Relationships Education, Relationships and Sex Education and Health Education statutory guidance (for introduction 1 September 2026).
- UK Council for Internet Safety / Department for Science, Innovation and Technology, Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024).
- Department for Education, Meeting digital and technology standards in schools and colleges: Filtering and monitoring core standard (updated June 2026).
- Department for Education, Behaviour in schools: advice for headteachers and school staff (updated February 2024).
- Department for Education, Suspension and permanent exclusion statutory guidance (version in force from 26 July 2026).
- Shropshire Safeguarding Community Partnership and Shropshire Learning Gateway procedures, thresholds and child-on-child abuse resources (current local versions).