Child-on-Child Abuse Policy

Based on the Nottinghamshire County Council Child-on-Child Abuse Policy

1st September 2026

Introduction

At Gotham Primary School, we have a **zero-tolerance** approach to all forms of Child-on-Child Abuse including Sexual Harassment and Sexual Violence (SHSV) and Problematic and Harmful Sexual Behaviour (P/HSB). We believe that Child-on-Child abuse is never acceptable, and it will not be tolerated. It will **never** be passed off as "banter," "just having a laugh," "a part of growing up" or "boys being boys." We will **respond to all signs, reports, and concerns** of Child-on-Child Abuse, including those that have happened outside of our school premises, and/or online. We will never minimise, dismiss or downplay concerns but we will always endeavour to respond in a contextual, strengths-based and trauma-informed manner, recognising that behaviour is a form of communication and some behaviours may be indicative of a child experiencing harm or abuse themselves. We will follow our behaviour and safeguarding policies to ensure that appropriate action is taken – this may include sanctions but will also focus on interventions designed to address the behaviours of concern.

We recognise that children are vulnerable to and capable of abusing their peers, and we take such abuse as seriously as abuse perpetrated by an adult. We recognise that even if there are no reports it does not mean it is not happening- it may be the case that it is just not being reported – we understand that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation. We acknowledge that children who have allegedly abused their peers or displayed Problematic and Harmful Sexual Behaviour are themselves vulnerable. We recognise that Child-on-Child Abuse can be linked to wider societal issues, including sexism, misogyny (and misandry), harmful online influences, incel ideology, harmful gender-based stereotypes / attitudes and Violence Against Women and Girls (VAWG), and we are committed to challenging these attitudes through a preventative whole-school approach. We recognise that the above may be indicators of safeguarding concerns. We understand the escalatory nature of misogyny (and misandry) and will challenge such attitudes and behaviours promptly to minimise the risk of Problematic and Harmful Sexual Behaviour, Sexual Harassment and Sexual Violence.

In cases where Child-on-Child Abuse is suspected or identified we will follow our Child Protection procedures and take all necessary steps to support all children who may have / have been affected by the situation including the victim(s) (the child who may have been / has been harmed, or the children who may have been / have been harmed) and **alleged** perpetrator (the child who has allegedly harmed a child or children).

Policy Development

This policy has been developed to reflect the most recent Keeping Children Safe in Education (KCSiE) Statutory Guidance (1 September 2026):

This policy is available:

- Online at https://www.gothamprimary.co.uk/about-us/policies/
- From the school office
- Child friendly versions are on display pupils

This policy is reviewed and evaluated throughout the academic year. It is updated annually.

Roles and Responsibilities

All staff working with children maintain an attitude of **'it could happen here,'** and this is especially important when considering Child-on-Child abuse.

The **Head teacher**, Janette Allen, has overall responsibility for the policy and its implementation and liaising with the Governing body, parents/carers, LA (Local Authority), and outside agencies.

Safeguarding is everyone's responsibility – however, all staff, parents/carers and pupils need to be aware of who to report to and how to report any safeguarding concerns. The **Designated Safeguarding Lead** (DSL) and their Deputy in our school are Janette Allen and Marta Kenny.

The nominated **Governors** with responsibility for Child-on-Child Abuse are Linda Dale and Louise Butler.

Definitions

Child-on-Child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-related and discriminatory bullying)
- Abuse in intimate personal relationships between children, (sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Serious physical assault and harm, or the threat of harm with a weapon
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- Consensual and non-consensual making or sharing of nudes and semi-nudes
- Image-based abuse, including the taking, creation, manipulation, sharing or threatened sharing of intimate, sexualised or humiliating images without consent.
- Upskirting (which is a criminal offence), 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 victim humiliation, distress, or alarm
- 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). This may also be an indicator of wider exploitation such as Child Sexual Exploitation (CSE) and/or Child Criminal Exploitation (CCE) and/or County Lines.
- Behaviour arising from sexist, misogynistic or discriminatory attitudes that may contribute to Problematic and Harmful Sexual Behaviour, sexual harassment or sexual violence.
- Technology-assisted abuse, including the creation, sharing or threatened sharing of AI-generated, manipulated or synthetic images or videos intended to humiliate, harass, control, threaten or exploit another child.

Staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online. This can include abusive, harassing, sexist or misogynistic / misandrist content, the non-consensual sharing of indecent images, AI-generated or digitally manipulated images and videos (including deepfakes), image-based abuse, threats to create or share such content, and the sharing of abusive images and pornography to those who do not wish to receive such content.

Recognising:

At Gotham Primary School, we recognise that behaviours associated with Child-on-Child Abuse and Problematic / Harmful Sexual Behaviour (P/HSB) take place on a continuum from inappropriate and problematic behaviours through to abusive and violent behaviours. Understanding where a child's behaviour falls on this continuum is essential to being able to respond appropriately to it. We recognise that early identification and intervention are essential in preventing escalation and that these behaviours may be indicative that the child themselves may be at risk of or subject to harm and / or abuse. We recognise that safeguarding concerns rarely exist in isolation and that Child-on-Child Abuse may occur alongside other vulnerabilities and harms including exploitation, domestic abuse, online harms, neglect, emotional wellbeing concerns and attendance concerns. Our staff will be suitably trained to identify and respond to concerns using professional curiosity and contextual safeguarding.

We recognise that all children grow and develop at their own pace. We will use our professional judgement and knowledge of child development when responding to Child-on-Child Abuse and Problematic / Harmful Sexual Behaviour.

Reporting and Responding:

At Gotham Primary School, we want children, parents/carers, staff, and visitors to confidently report abuse, knowing their concerns will be treated seriously. We recognise that our school's initial response to a report of Child-on-Child abuse is incredibly important - how we respond to a report can encourage or undermine the confidence of future victims to report or come forward. As a school, we will also respond to reports of alleged Child-on-Child Abuse that have occurred online or outside of school. These reports will be treated seriously, and the school remains committed to supporting and safeguarding all parties including the victim(s) (the child who has been, or the children who have been harmed), **alleged** perpetrator (the child who has allegedly harmed a child or children), and any other child(ren) who may be affected.

We use a trauma-informed and strengths-based approach when responding to children who have or may have experienced harm and children who have displayed harmful behaviours, recognising that both may require support, intervention and safeguarding. We will make decisions on a case-by-case basis, with the Designated Safeguarding Lead (or a deputy) taking the leading role and using their professional judgement, supported by other agencies, such as the Local Authority, Children's Social Care, and the Police as appropriate. We will ensure that we reference and follow other school policies and procedures as appropriate.

We have clear reporting systems for each group of our school community: the effectiveness of these reporting systems is reviewed throughout the academic year and may be expanded to meet the needs of all members of our community.

Children (including bystanders):

It is important to understand that a victim (a child who has been harmed) may not find it easy to tell staff about their abuse verbally - some children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim (a child who has been harmed) may not make a direct report. We recognise that in some instances another child may report on another child's behalf. All children will know how to report concerns or incidents of Child-on-Child Abuse.

We ask that all children report any concerning behaviour to a member of school staff – this can be any member of teaching or non-teaching staff, including a class teacher, a TA, the Head teacher, a lunchtime supervisor, or a member of the office team. We talk about trusted adults regularly in class and in assemblies to remind our children of who they can report concerns to.

The member of staff will listen to the child and make an initial note of their concerns. They will then discuss next steps with them and reassure them that they will be supported. In line with the statutory guidance provided in Keeping Children Safe In Education, we will never promise a child that we will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child. The member of staff will make a formal record of the concern on CPOMs and other relevant members of staff will be alerted. The member of staff will directly alert the school's Designated Safeguarding Lead if the report is deemed urgent or if a child is considered at risk.

We understand that some children may find it difficult to tell a member of staff about their concerns verbally, we therefore have additional reporting mechanisms in place. Our school has a worry box in each classroom where the child can put their name/a brief note about their concerns/draw a picture of their concern – these worry boxes are introduced to the children at the start of the year, and children are reminded of them regularly. Our school also has a designated Safeguarding email address help@gotham.notts.sch.uk – if a child feels unable to tell a member of staff about their concerns verbally, they could send an email with their concerns, and these will be followed-up/responded to by the school's Designated Safeguarding Lead or Deputy.

Parents/carers

We understand that parents and carers may well struggle to cope with making or receiving a report that their child has been the victim of (has been harmed) or is an alleged perpetrator (has allegedly harmed a child or children) of Child-on-Child Abuse.

In line with the statutory guidance provided in Keeping Children Safe in Education, we will seek advice and support from other services as decided on a case-by-case basis. All decisions and actions taken by the school will consider the needs of the individual children involved, and the wider school community.

We ask that if parents/carers have concerns about their child experiencing or allegedly perpetrating Child-on-Child Abuse, that they contact the school's Designated Safeguarding Lead/Deputy (in person/via telephone call/via email) to explain their concerns. The Designated Safeguarding Lead/Deputy will take an initial note of the concerns but may ask to schedule a meeting to allow for more time to discuss the concerns in detail. Following the report and/or the meeting, the Designated Safeguarding Lead/Deputy will make a formal record of the report on the school's recording system (CPOMs) and other relevant members of staff will be alerted. The Designated Safeguarding Lead/Deputy will seek advice from Statutory Services if the report is deemed urgent or if a pupil is considered at risk.

We ask that parents/carers speak directly to the school with their concerns rather than discussing them with other members of the school community in person or online.

Our school remains committed to supporting pupils and their families in all instances of Child-on-Child Abuse. We will endeavour to ensure that all parties are kept informed of progress and any developments, but we will also need to show due regard to GDPR (General Data Protection Regulations) and ongoing investigations by statutory services. This may mean, at times, that we are not able to provide or share information or updates.

If a parent/carer is not satisfied with our school's actions, we ask that they follow our school's complaint policy and procedures. This is available online from our school website and on request from the school office.

Staff

Our staff work closely with our children and therefore may notice a change in a child's behaviour or attitude that might indicate that something is wrong before receiving a report from a child or a member of the school community. If staff have any concerns about a child's welfare or are concerned that a child is displaying behaviours that may show they have been the victim of (are being harmed/has been harmed) or that they are perpetrating (are

harming/have harmed a child or children) Child-on-Child Abuse, they should act on them immediately rather than wait to be told.

We ask that staff report their concerns to a Designated Safeguarding Lead/directly to the Head teacher. The member of staff receiving the report will make a formal record of the concern on the school's recording system (CPOMs) and other relevant staff members will be alerted. The Designated Safeguarding Lead/Deputy will seek advice from Statutory Services if the report is deemed urgent or if a pupil is considered at risk.

Visitors

We ensure that all visitors to our school are aware of our Child Protection and Safeguarding procedures and which staff member they should report any concerns to (the member of staff may differ depending on the purpose of the visit e.g. supply teacher, governor, external agency etc.).

We ask that if a visitor to our school has any concerns about Child-on-Child Abuse, that they have witnessed, or have been told about, that they report their concerns at the earliest opportunity in person to the school's Designated Safeguarding Lead/the Head teacher/a member of the Senior Leadership Team. We ask that visitors report their concerns in person by the end of the school day. For example, it would not be appropriate to wait until the following day or leave a written note with concerns. The member of staff receiving the report will record the concerns on the school's recording system (CPOMs) and other relevant staff members will be alerted. The Designated Safeguarding Lead/Deputy will seek advice from Statutory Services if the report is deemed urgent or if a child is considered at risk.

Recording and evaluating:

We will ensure a written report is made as soon after the disclosure as possible, recording the facts as presented by the child. These may be used as part of a statutory assessment if the case is escalated. We will ensure the Designated Safeguarding Lead (or deputy) will be informed as soon as possible, if they were not involved in the initial report. We will ensure that details of decisions made and reasons for decisions are recorded as well as any outcomes within CPOMs.

We will ensure that any 'safety plans' are recorded (electronically) and kept under review. These will be stored in the i-drive in a folder called safeguarding and child protection and a copy will be put into CPOMs.

Strategies for Prevention:

We recognise that preventing Child-on-Child Abuse requires more than responding to incidents. Our approach focuses on developing a culture of safety, respect and belonging, where professional curiosity is valued, children's voices are heard, difficult conversations can take place safely, and the underlying causes of harmful behaviours are identified and addressed at the earliest opportunity.

Our school, Gotham Primary, actively seeks to raise awareness of and prevent all forms of Child-on-Child Abuse by:

- **Staff training** – including for supply staff, governors or management committees, volunteers, and visitors. Give specific details of the information and training to be provided - you may include:
    - Identification and classification of specific behaviours (such as SHSV, P/HSB) and understanding of all forms of abuse, neglect, or exploitation.
    - Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

- Recognising that harmful attitudes, discriminatory language, misogyny, misandry, bullying and sexual harassment can exist on a continuum. Staff will be trained to identify, challenge and address lower-level behaviours before they escalate into more serious concerns.
- Creating psychologically safe learning environments where children feel listened to, respected and able to express their thoughts, concerns and experiences without fear of ridicule, judgement or retaliation.
- Developing staff confidence to facilitate respectful and sometimes challenging conversations about relationships, gender, consent, equality, stereotypes, prejudice, online influences and social norms in a way that promotes inclusion and critical reflection.
- Challenging sexist, misogynistic, discriminatory and harmful attitudes, beliefs and behaviours that may underpin Child-on-Child Abuse, (some of which may be criminal in nature) such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting-up skirts. As well as those encountered online and through social media, influencers, gaming environments and other digital platforms.
- Developing and maintaining professional curiosity, recognising that concerning behaviours may be indicators of unmet need, trauma, exploitation, abuse, harmful experiences, or wider contextual factors. Staff will be supported to look beyond the presenting behaviour and consider "what may be happening for this child?" as well as "what has happened?".
- Understanding the importance of identifying and addressing the root causes of concerning behaviour, rather than focusing solely on sanctions or consequences. Staff will consider the child's lived experiences, safeguarding history, peer influences, family circumstances, online experiences, and wider environmental factors when assessing risk and planning support.
- Understanding how Child-on-Child Abuse may be linked to wider safeguarding concerns and societal issues, including Violence Against Women and Girls (VAWG), sexism, misogyny, harmful online influences, incel ideology, harmful gender stereotypes and discriminatory attitudes.
- Recognising that early identification and challenge of sexist and misogynistic behaviours can form an important part of preventing the escalation of Problematic and Harmful Sexual Behaviour (P/HSB), Sexual Harassment and Sexual Violence.
- Ensuring that the Governing body / proprietors / management committee are aware of their statutory safeguarding responsibilities (effective child protection policy – Child-on-Child Abuse policy).
- Ensuring that all Child-on-Child Abuse issues are fed back to the safeguarding lead/team so that they can spot and address any concerning trends and identify those children who may need additional support.
- Training and regular updates regarding online risks, harms, and technology-assisted abuse, and appropriate signposting of further support and advice in relation to online safety.

- **Information for children (pupils/students)** - this information will be given during PSHE, RHSE and online safety sessions, as well as during assemblies and incidentally during the school day. The information will include:
  - We actively promote a culture and ethos where children feel safe to ask questions, challenge stereotypes, discuss concerns and seek support. Children are encouraged to understand that there are no "wrong" questions when seeking help or trying to understand relationships, behaviour, safety or wellbeing.
  - All children are frequently told what to do if they witness or experience any form of Child-on-Child Abuse, the effect that it can have on those who experience it and the possible reasons for it
  - We help children develop the confidence to speak up when they see or experience behaviour that causes concern, and to act as responsible and respectful bystanders / upstanders where it is safe to do so.

- Children are regularly informed about the school's approach to all forms of Child-on-Child Abuse, the process for reporting their concerns of Child-on-Child Abuse and where to go for further help, support, and advice.
- We educate all children about the nature and prevalence of Child-on-Child Abuse via a well embedded RHE/RSHE curriculum, PSHE curriculum or wider curriculum.
- We teach age-appropriate information regarding online risks, harms, and technology-assisted abuse, and appropriate signposting of further support and advice in relation to online safety.
- We support children to develop critical thinking skills that enable them to question stereotypes, challenge harmful social norms, assess information from online and offline sources, and recognise misinformation, manipulation and inappropriate influences.
- We encourage respectful dialogue and discussion skills, helping children to disagree appropriately, listen to different perspectives, express their views safely and respectfully, and engage in constructive conversations about sensitive issues.
- We provide children with an understanding of how behaviour is influenced by emotions, experiences, relationships, peer pressure, social expectations and environmental factors.
- We teach children to recognise that concerning or harmful behaviour often has underlying causes and that seeking support early is an important part of keeping themselves and others safe.
- We support children to develop empathy, self-awareness, emotional regulation and accountability for behaviour.
- We help children to understand the impact of harmful language, discriminatory behaviour, misogyny, prejudice and stereotypes on individuals, relationships and the wider community.

- **Information for parents/carers** - updated policies and
  - Talking to parents, both in groups and one-to-one
  - Providing opportunities for parents to be involved in the review of school policies and lesson plans; and encouraging parents to hold the school to account on this issue
  - Asking parents what they perceive to be the risks facing their child and how they would like to see the school address those risks
  - Challenging the attitudes that underlie Child-on-Child Abuse – in school and/or the wider community
  - Ensuring parents /carers are aware of the ethos and culture of the school or college
  - Sharing of regular information regarding online risks, harms, and technology-assisted abuse, and appropriate signposting of further support and advice in relation to online safety.

- **RHE (Relationships and Health Education) / RSHE curriculum**
  - Gotham Primary School has a clear set of values and standards, upheld, and demonstrated throughout all aspects of school life, which is supported by a planned programme of evidence based RSHE curriculum.
  - Through our RHE/RSHE/PSHE curriculum, we aim not only to provide knowledge but also to develop children's critical thinking, decision-making and communication skills. We create a safe and respectful learning environment where children can explore complex topics, ask questions, challenge assumptions, evaluate information, recognise harmful attitudes and understand how their choices and behaviours affect others.
  - Our RHE/RSHE/PSHE programme is fully inclusive and developed to be age and stage of development appropriate (especially when considering children with SEND (Special Educational Needs and Disabilities) and/or other vulnerabilities).
  - We will, through our RHE/RSHE/PSHE programme promote:
    - Healthy, respectful and kind friendships and relationships
    - Boundaries and consent
    - Equality and raise awareness of stereotyping and prejudice
    - Body confidence and self-esteem
    - How to recognise an abusive relationship, including coercive and controlling behaviour

- The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, teenage relationship abuse (intimate personal relationships between children), and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable

Breaches / Complaints:

Breaches to this policy will be dealt with in the same way that breaches of other school policies are dealt with, as determined by the Head teacher and Governing Body.

If a parent/carer is not satisfied with our school's actions, we ask that they follow our school's complaint policy and procedures. This is available online from our school website, and on request from the school office.

Links with other policies:

You may find it helpful to read this Child-on-Child Abuse policy alongside the other following school policies:

Policy	How it may link
Child Protection Policy	Includes information about child protection procedures and contextualised safeguarding
Behaviour Policy	Includes details about the school's behaviour system including potential sanctions for pupils
Anti-Bullying policy	Includes information about bullying behaviours and vulnerable groups
Online Safety Policy including Acceptable Use Policies	Includes information about children's online behaviour and details about online bullying/cyberbullying
Equality Policy	Includes information about our school's approach to tackling prejudice and celebrating differences. Links to prejudice-related language and crime and the protected characteristics
RSHE / PSHE Policy	Includes information about our school's RSHE programme and how we teach about healthy relationships, friendships, and bullying
Complaints Policy	Includes information about how to make a complaint if you are not satisfied with the school's response

Further information and support can be found through the following links:

- Part 5: Child-on-Child Sexual Harassment and Sexual Violence of Keeping Children Safe in Education (2026) - Keeping children safe in education - GOV.UK
- Definitions - Keeping children safe in education - GOV.UK
- Simon Hackett (2010) Continuum model of sexual behaviours -
  - Sexual development and behaviour in children | NSPCC Learning
  - NSPCC Learning Understanding sexualised behaviour in children | NSPCC Learning
- Shore Space – Lucy Faithful Foundation, confidential service supporting young people concerned about their own or someone else's sexual thoughts and behaviours

Monitoring and Review

This policy is reviewed and evaluated throughout the academic year. It is updated annually.
Date approved by the Governing Body: 16th September, 2026
Date to be reviewed: September, 2027