



**Stronger
Together**

Child on Child Abuse and Harmful Sexual Behaviour Policy	
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Queensbridge School
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1. Introduction

It is normal for some children and young people to display sexualised behaviour towards their peers as they develop. However, sexualised behaviour that is **violent, abusive, problematic, or inappropriate** is not acceptable and must be addressed. Our school recognises that young people are both vulnerable to and capable of engaging in these behaviours.

We take seriously any incident or allegation involving **violent, abusive, problematic, or harmful sexual behaviour** between peers. We do not tolerate or dismiss such behaviour as 'banter', 'just having a laugh', or 'part of growing up'. These behaviours are treated as safeguarding concerns and are responded to in line with our Child Protection Policy, with guidance sought from other agencies as appropriate.

This policy reflects the safeguarding requirements set out in *Keeping Children Safe in Education* (DfE, 2024), particularly **Part 5**, which outlines how schools should manage reports of child-on-child sexual violence and harassment. The policy also refers to guidance from the Department for Education (2018): *Sexual violence and sexual harassment between children in schools and colleges*.

We aim to foster a culture of safety, respect, and openness, where all children and young people feel empowered to speak up and know they will be supported without judgment.

2. Definition of sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. These activities may include:

- **Physical contact**, such as:
 - Assault by penetration (e.g. rape, oral sex)
 - Non-penetrative acts (e.g. masturbation, kissing, rubbing, or touching outside of clothing)
- **Non-contact activities**, such as:
 - Involving children in looking at or producing sexual images
 - Watching sexual activities
 - Encouraging children to behave in sexually inappropriate ways
 - Grooming a child in preparation for abuse

Sexual abuse can also occur online and may be facilitated by technology, even when abuse later occurs offline.

Importantly, **sexual abuse of children by other children** is a **specific safeguarding concern** in educational settings. In line with statutory guidance, we consider any child-on-child sexual abuse to be a serious safeguarding issue.

Later in this policy, we will distinguish between a range of sexual behaviours, from developmentally expected behaviour to violent abuse. Our school uses the **Hackett Continuum** to support our understanding of the **context and severity** of sexual behaviours, particularly when trying to determine whether a behaviour is inappropriate, problematic, harmful, or violent.

3. Harmful sexual behaviour

Harmful sexual behaviour (HSB) can manifest in various ways. It includes behaviours that are problematic, abusive, or violent, and which go beyond what is developmentally expected for a child or young person's age or stage of development.

Examples of harmful sexual behaviour may include:

- Inappropriate or unwanted sexualised touching
- Sexual violence and sexual harassment
- Upskirting, typically involving the taking of images under clothing without consent
- Pressurising, coercing, or forcing someone to share nude images (*"sexting" or youth-produced sexual imagery*)
- Sharing sexual images of a person without their consent
- Bullying of a sexual nature, online or offline, such as sexual or sexist name-calling

Our school understands that harmful sexual behaviour can occur in various contexts: at school, at home, in public spaces, or online. It may happen in both supervised and unsupervised settings—such as toilets, corridors, changing rooms, outside play areas, and during journeys to and from school.

Considering Context and Spectrum of Behaviour

The following outlines a spectrum of harmful sexual behaviour, which helps staff in identifying concerning behaviours across varying levels of severity.

a) Developmentally Expected Behaviour

At certain stages in child development, behaviours such as curiosity about bodies or gender differences are normal and non-threatening. These behaviours are typically non-coercive, temporary, and arise from natural curiosity about sexuality and relationships. Examples include:

- Asking questions about bodies, relationships, or sexual topics.
- Exploring or comparing bodies in a safe, non-coercive manner.

It is important to understand the age and developmental stage of the child when assessing whether these behaviours are appropriate. Developmentally expected behaviours should be differentiated from other more concerning actions, and staff should guide children toward healthy boundaries with education and support.

b) Inappropriate Behaviour

Inappropriate behaviours are those that go beyond developmental norms and may cause discomfort or distress to others. These behaviours are not violent or coercive, but they breach social or environmental boundaries. Such behaviours should be corrected through education and clear guidelines. Examples include:

- Making unsolicited sexualized comments or jokes.
- Engaging in inappropriate sexual discussions with peers or adults.

Although uncomfortable, inappropriate behaviour does not necessarily indicate abusive or violent intent but should still be addressed immediately with appropriate guidance to prevent escalation.

c) Problematic Behaviour

Problematic behaviours go beyond the scope of inappropriate actions and reflect a lack of understanding or disregard for boundaries. These behaviours may be developmentally unusual and socially unexpected behaviour, compulsive and consent may be unclear. It may also involve an imbalance of power. Examples include:

- Sharing sexually explicit images without consent (e.g., sexting).
- Persistent sexual harassment or comments that are ignored or rejected.

Such behaviours require intervention, either through one-on-one conversations, education, or referrals for professional support.

d) Abusive Behaviour

Abusive behaviour refers to actions that are intrusive and harmful both to the child exhibiting them and to those towards whom the behaviour is directed. These behaviours often involve a misuse of power, coercion, or force, and may carry elements of victimisation. Abusive behaviour can include expressive violence and a lack of informed consent, meaning that the victim either did not consent or was unable to freely give consent. These behaviours represent significant harm and require immediate intervention to protect the victim and address the underlying causes of the behaviour. These behaviours are classified as harmful sexual behaviours (HSB). Examples include:

- Repeated harassment after a clear refusal or protest.
- Making threats to force others into sexual activity or to engage in sexualised behaviour.

Abusive behaviours represent a significant safeguarding concern and require immediate reporting, police involvement, and protective measures.

e) Violent Behaviour

Violent sexual behaviour is the most extreme end of the spectrum. These behaviours are physically harmful and involve the use of force. They represent a direct threat to the victim's safety and wellbeing and require urgent action. Violent behaviour may include:

- Sexual assault with physical injury or force.

- Engaging in acts that cause severe physical harm to the victim (e.g., bruises, cuts, or worse).
- Any sexual act that places the victim at risk of serious harm.

Violent sexual behaviour should be reported immediately to the police, and further protective actions must be taken to ensure the safety of all involved.

Contextual Considerations

When determining the severity of harmful sexual behaviour, it is essential to consider the context in which it occurs. Key considerations include:

- **Age and Developmental Stage:** What is typical behaviour for the child’s age and maturity level? Are they capable of understanding boundaries, consent, and the implications of their actions?
- **Power Imbalance:** Is there an unequal power dynamic (e.g., age, size, or authority) between the child or young person involved and the victim? Are they using their power to manipulate or coerce?
- **Setting:** Did the behaviour occur in a context where supervision was lacking or peer pressure played a role? Were there opportunities for boundary-pushing or inappropriate behaviour to occur?
- **Past Trauma or Abuse:** Are there signs that the child has experienced abuse or trauma that could contribute to their behaviour?

Using the Hackett Continuum

To assist staff in evaluating harmful sexual behaviour, the Hackett Continuum (outlined in Appendix A) provides a tool for assessing the range of behaviours, from developmentally expected to violent sexual acts. This continuum can be used to guide the identification of HSB and support decision-making around appropriate responses and interventions.

4. How we seek to minimise the risk of harmful sexual behaviour

Our overarching aim is to create a culture where children and young people can develop safe, respectful relationships, both now and in the future. We promote an environment in which all pupils feel safe to speak out, knowing they will be listened to without judgment, and where their concerns will be acted upon appropriately.

We work across three key groups to minimise the risk of harmful sexual behaviour: children and young people, parents and carers, and staff.

Children and Young People

Through our Relationships, Sex and Health Education (RSHE), delivered through our PSHE (known as TfL) curriculum, we teach pupils—at a developmentally appropriate level—about:

- What constitutes inappropriate, problematic, and harmful sexual behaviour

- Why such behaviour is never acceptable
- The impact such behaviour can have on others
- What to do if they feel uncomfortable or witness behaviour that is unsafe
- The importance of reporting concerns to a trusted adult

We are mindful that not all pupils are able to clearly articulate what is happening to them, or may find it difficult to disclose abuse. We take proactive steps to support children who may be particularly vulnerable, including:

- Those with English as an Additional Language (EAL)
- Children with Special Educational Needs and Disabilities (SEND)
- Children with communication difficulties or neurodivergent profiles

We use accessible communication tools, visual resources, and targeted interventions to support understanding and help these pupils express concerns in safe and supported ways. We also work with specialist professionals as needed.

Parents and Carers

We aim to work in partnership with parents and carers to help reinforce messages around appropriate relationships and sexual behaviour. We provide guidance and signpost to resources to help families:

- Understand the nature and signs of harmful sexual behaviour
- Recognise the impact such behaviour can have on young people
- Know what to do if they are concerned their child is a victim or is displaying concerning behaviour

Resources we recommend include those from the NSPCC, the Lucy Faithfull Foundation, and local safeguarding partnerships.

Staff

All staff receive annual safeguarding training, which includes a specific focus on harmful sexual behaviour and how it can present. This is supplemented with ongoing updates throughout the year to keep staff informed about:

- Current trends in harmful sexual behaviour (including online harm)
- Our expectations for vigilance and early intervention
- How to respond to disclosures and support pupils in distress

We ensure staff are familiar with internal procedures, including how to report concerns, and provide them with tools such as the Hackett Continuum to assist in understanding the behaviour they may observe.

Importantly, staff are trained never to minimise or dismiss behaviour that may seem minor, but which could indicate a broader safeguarding concern.

5. Our response to an incident / allegation

The wellbeing and safety of our pupils are at the heart of our response to any incident or allegation involving sexualised behaviour. We are committed to treating all reports with sensitivity, seriousness, and care.

Any pupil disclosing a concern will be:

- Treated with respect and compassion
- Reassured that they are being taken seriously
- Informed that they will be supported and kept safe
- Told clearly that confidentiality cannot be promised, as safeguarding concerns must be shared with appropriate adults and agencies

The Designated Safeguarding Lead (DSL) must be informed as soon as possible, and may consult with Children's Social Care, the police, or other relevant agencies. Where a child already has involvement from Social Care (e.g., is Looked After, has a Child in Need Plan or Child Protection Plan), their allocated Social Worker will be informed.

Where appropriate, steps will be taken immediately to safeguard all children involved. This may include separating the children involved on school premises or during transport arrangements.

If the Incident Includes an Online Element

We follow national guidance strictly when responding to incidents involving online sexual content, including indecent imagery. Staff must follow this protocol:

Staff must:

- Report concerns to the DSL immediately
- Seek guidance before taking any action, including speaking to the child in detail

Staff must not:

- View, copy, print, store, share, or delete any indecent imagery
- Ask the child to share or download the imagery
- Ask for details about the image(s) or how it was created
- Share information about the incident with other staff, students, or families unless authorised
- Say or do anything that might blame or shame the young person

If the image has already been seen accidentally (e.g., shown to a staff member by a pupil), this must be reported to the DSL immediately and support should be offered to the staff member as well.

Recording

All incidents and concerns related to harmful sexual behaviour must be recorded on MyConcern as with any other safeguarding issue.

Records must:

- Include the date, time, location, and nature of the concern or disclosure
- Use the young person's words as accurately as possible
- Be factual and objective, avoiding interpretation or speculation
- Be supplemented with a body map, if physical evidence is present

Records must be passed to the DSL immediately, who will decide on next steps and update the safeguarding file.

Investigation

The DSL will lead the investigation process and act as the main point of contact for external agencies and for the families involved. Key responsibilities include:

- Coordinating the school's internal response
- Liaising with Children's Social Care and the police
- Ensuring accurate, dated, and detailed records are maintained
- Keeping families informed (unless this would place a child at further risk)

Risk Assessment

Following any allegation of harmful sexual behaviour, the DSL will carry out a risk assessment considering the needs of all pupils involved and any wider risks to the school community.

Risk assessments will consider:

- Supervision requirements
- Changes to timetables, seating plans, or access to shared spaces
- The views of parents/carers and the pupils involved
- Support strategies to prevent further harm or distress

Risk assessments are dynamic and will be reviewed regularly to remain fit for purpose.

6. Guiding principles

Our approach to managing harmful sexual behaviour will always prioritise the safety, wellbeing, and dignity of all pupils involved. This section sets out the principles that guide how we respond to incidents of harmful sexual behaviour, ensuring that our actions are consistent, fair, and appropriate to the situation.

Principles Guiding Our Response

1. **The safety of our pupils is paramount.**

The safety and protection of the victim, the alleged perpetrator, and all other pupils involved must be always prioritised. We will take swift and proportionate action based on the nature and severity of the concern.

2. **Child-centred approach.**

All actions taken will be child-centred, considering the individual needs, developmental stage, and wishes of each young person involved. We will make every effort to engage the young person in decisions about how the situation is managed, while always acting in their best interests.

3. **A non-judgmental and supportive approach.**

No pupil will be judged or stigmatised for their experiences, and we will avoid language or actions that could be perceived as blaming, shaming, or criminalising. We will support both the young person who has been harmed and the young person who is alleged to have displayed harmful sexual behaviour, as both may need significant support and guidance.

4. **Proportionality and reasonableness.**

Our responses will always be proportionate to the situation, ensuring that interventions are appropriate to the behaviour and the young person's developmental stage. This includes not overestimating the risks and understanding that the spectrum of sexual behaviour can range from developmentally expected to violent. We will avoid disproportionate punitive measures and focus on education and rehabilitation where appropriate.

Supporting the Young Person Who Has Allegedly Experienced Harmful Sexual Behaviour

We will assess the immediate and long-term support needs of any young person who has been harmed, providing support to help them recover from their experiences. The following actions will be taken:

- **Immediate response:** The victim will be supported promptly, ensuring that they are removed from situations where they may feel unsafe or pressured. This may involve adapting their timetable or creating a safe space where they can be with a trusted adult.
- **Long-term recovery:** We will offer ongoing support, including working with external agencies, ensuring the victim receives any therapeutic or mental health support they may require.
- **Confidentiality and control:** The young person's wishes will be considered regarding confidentiality, and they will have as much control over the process as is reasonably possible.

We will involve the young person's family and other support networks, ensuring that support is holistic and long-term.

Supporting the Young Person Who Has Allegedly Displayed Harmful Sexual Behaviour

We recognize that children and young people who display harmful sexual behaviour may also need support. This support is not about excusing or minimising the behaviour but rather addressing the underlying causes and working to prevent future harm. The following steps will be followed:

- **Assessment of needs and risks:** We will assess the young person's needs, including any underlying vulnerabilities or difficulties (e.g., learning disabilities, past trauma). We will also evaluate the risks posed by the young person to others.
- **Support and intervention:** Where necessary, we will provide appropriate interventions, which may include counselling.
- **Appropriate sanctions:** We will use our Behaviour Policy to apply proportionate sanctions, but these will be focused on rehabilitation, reflection, and support rather than punishment.
- **Ongoing review:** The young person's progress will be reviewed regularly to ensure that they are receiving the support they need and that they are not at risk of repeating harmful behaviour.

Key Considerations

1. **The wishes of the young person:** The victim will be given as much control as possible over how the situation proceeds, within the context of safeguarding the child and others.
2. **Age and developmental stage:** All actions will consider the ages and developmental stages of the children involved. Younger children or those with additional needs may not fully understand the impact of their behaviour or may have difficulty communicating their feelings.
3. **Power imbalances:** We will consider any power imbalances between the children involved, such as differences in age, physical strength, confidence, or maturity, and will take these into account when deciding on actions.
4. **Ongoing risks:** The school will take steps to assess and mitigate any ongoing risks to the victim, the alleged perpetrator, or other pupils at the school.

This child-centred, risk-based approach will guide all decisions, ensuring that we do not rush to judgment or make assumptions about the intent or impact of the behaviour. Instead, we will aim to understand the circumstances fully, supporting the young people involved appropriately.

7. Investigation outcomes

Our investigation of an allegation or incident as set out in this policy will enable us to determine the outcome, working with our safeguarding partners as appropriate. We will always seek to ensure that the outcome of an investigation is appropriate and proportionate to the circumstances in relation to the report. Various options are open to us, as set out below:

Manage internally

In some cases, for example, one-off incidents, we may take the view that the young person concerned are not in need of early help or statutory intervention. In these cases, we will follow our other school policies in addressing matters, for example our Recognition and Behaviour Policy/Anti-bullying Policy.

We will also consider what support the young person involved may need going forward - for example, pastoral support, counselling services, and ensuring that there is a trusted adult for those affected to speak with if they wish to. We will also consider whether any intervention or support is required as part of a whole setting approach or with the wider school community.

Early Help

Where statutory intervention is not required or agreed, we may use Early Help instead. This means providing support as soon as a problem emerges, at any point in a young person's life. We will work with parents and carers and other relevant partners when following this approach, which can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation.

Requests for Support to Children's Social Care

Where a young person has been harmed, is at risk of harm, or is in immediate danger, we will make a Request for support to Children's Social Care. We will generally inform parents and carers of this unless to do so may put a young person at additional risk. We will seek advice from other partners on such matters.

If we make a request for support, Children's Social Care will consider whether the CYP involved need protection or other services. Where statutory assessments are appropriate, the school will work with Children's Social Care and other agencies as appropriate. Partnership working helps to ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other young person that require support.

In some cases, Children's Social Care will review the evidence and decide a statutory intervention is not appropriate. If a statutory assessment is not considered appropriate by Children's Social Care, we will consider what other support may be required. We will make further requests for support to Children's Social Care if we consider that a young person remains in immediate danger or at risk of harm.

Reporting to the police

Where a report of rape, assault by penetration or sexual assault is made, we will report it to the police. We will generally inform parents or carers about reports of sexual abuse, unless to do so may put a young person at additional risk. We will seek advice from other partners in individual cases.

In circumstances where parents or carers have not been informed, we will ensure that we support the young person in any decision we take. This is likely to be with the support of Children's Social Care and any appropriate specialist agencies.

Where we have made a report to the police, we will consult with them and agree what information can be disclosed to staff and others, in particular the alleged perpetrator and

their parents or carers. We will also discuss the best way to protect the victim and their anonymity.

Where there is a criminal investigation, we will work closely with the police and other agencies as appropriate to support all young people involved (including potential witnesses). This will help to ensure that any actions we take do not jeopardise a police investigation. Sometimes the police will decide that further action is not required. In these circumstances we will continue to engage with other agencies to support the young people involved.

8. Review

All child protection concerns are reviewed regularly, to ensure that everything has been fully addressed, that actions are completed, and to consider whether the young people involved need any further support. We will continue to work with parents and carers and other agencies as appropriate, and risk assessments will be reviewed and updated as required.

Appendix A

Hackett Continuum

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviours	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Socially acceptable behaviour within peer group	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure victim compliance	Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
Shared decision-making	Generally consensual and reciprocal	Consent issues may be unclear	Intrusive	Sadism
		May lack reciprocity or equal power	Informed consent lacking or not able to be freely given by victim	
		May include levels of compulsivity	May include elements of expressive violence	

Appendix B

Responding to concerns about a child

At Queensbridge School our DSLs are **Ian Horgan; Sue Taylor; Sophie Dunleavy; India Bellaviti; David Spicer; Rachel Wheeler; Alison Lee; Karen Hill**

Our safeguarding governor is **Daniel Parnell**



CONCERN ABOUT A CHILD:

- Speak to Designated Safeguarding Lead (DSL) if urgent.
- Record on My Concern



**DSL review concerns and decide next steps
referring to Right Help Right Time (RHRT)**

- Consider discussing concerns with parent / carers and seek consent where appropriate.
- Consider completing Early Help Assessment (EHA).

Policy
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Date of