Eden Primary School
Peer on Peer Abuse Policy and Procedures

September 2020

Governor Responsible	Achievement Committee
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Peer on Peer Abuse Policy

Introduction

Keeping Children Safe in Education 2020 states that 'Governing bodies and proprietors should ensure there are appropriate policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.

These should include individual schools having an effective **child protection policy** which:
- should describe procedures which are in accordance with government guidance;
- refer to locally agreed multi-agency safeguarding arrangements put in place by the three safeguarding partners;
- include policies as reflected elsewhere in Part two of this guidance, such as online safety, peer on peer abuse and SEND.

Eden staff have an awareness of, and are regularly trained in, safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

All staff are made aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:
- abuse in intimate personal relationships between peers;
- bullying (including cyberbullying);
- 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);
- 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 stand-alone or part of a broader pattern of abuse;
- sharing self-generated indecent images (also known as sexting);
- 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); and
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

(KCSIE 2020)

At Eden Primary we are committed to the prevention, early identification and appropriate management of peer on peer abuse. We continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to the impact on that individual child's emotional and mental health and well-being.

Our policy includes a clear and comprehensive strategy taking a contextual whole-school approach to preventing and responding to peer on peer abuse, which includes a clear understanding to staff, children and their parents about everyone's responsibility in managing any peer on peer abuse incidents. This will include both our prevention measures as well as our response to any incidents of harm.

Purpose and Aim

Children may be harmful to one another in a number of ways, which would be classified as peer on peer abuse. The purpose of this policy is to explore the many forms of peer on peer abuse and include preventative measures as well as a planned and supportive response to the issues. It is the school's overarching policy for any issue that could constitute peer on peer abuse. It should be read in conjunction with the **Eden Safeguarding and Child Protection Policy** and any other relevant policies including, but not limited to:

Anti-Bullying Policy
Online Safety Policy
Behaviour and Relationships Policy
Staff Code of Conduct
Whistleblowing Policy.

Framework and Legislation

This policy is supported by the key principles of the *Children Act 1989* that the child's welfare is paramount. Another key document that focuses adult thinking towards the views of the child is *Working Together to Safeguard Children 2018*, highlighting that every assessment of a child, should 'reflect the unique characteristics of the child within their family and community context' (*Working Together, 2018*:28). This is clearly echoed by *Keeping Children Safe in Education 2020* through ensuring procedures are in place in schools and settings to hear the voice of the child and to be mindful of the contexts children live in.

Government Guidance documents

HM Government, *What to do if you're worried a child is being abused, advice for practitioners*, March 2015

Department for Education, *Preventing and Tackling Bullying: Advice for headteachers, staff and governing bodies*, July 2017

Department for Education, *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges: Advice for Governing Bodies, Proprietors, Head Teachers, Principals, Senior Leadership Teams and Designated Safeguarding Leads*, May 2018

Department for Education, *Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children*, July 2018

Department for Education, *Keeping Children Safe in Education: Statutory guidance for schools and colleges*, September 2020

What is 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, and/or gender-based violence. Examples of online peer-on-peer abuse would include sexting, online abuse, peer-on-peer grooming, the distribution of youth involved sexualised content, and harassment.

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. 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. This means:

- being aware of and seeking to understand the impact that these wider social contexts may be having on the School's pupils,
- creating a safe culture in the School by, for example, implementing policies and procedures that address peer-on-peer abuse and harmful attitudes; promoting healthy relationships and attitudes to gender/ sexuality; hotspot mapping to identify risky areas in the School; training on potential bias and stereotyped assumptions,
- being alert to and monitoring changes in students' behaviour and/or attendance, and
- contributing to local child protection agendas by, for example, challenging poor threshold decisions and referring concerns about contexts to relevant local agencies

Contextual circles of child and adolescent vulnerability (Firmin, C., Abuse Between Young People: A Contextual Account, 2017. Oxon: Routledge)
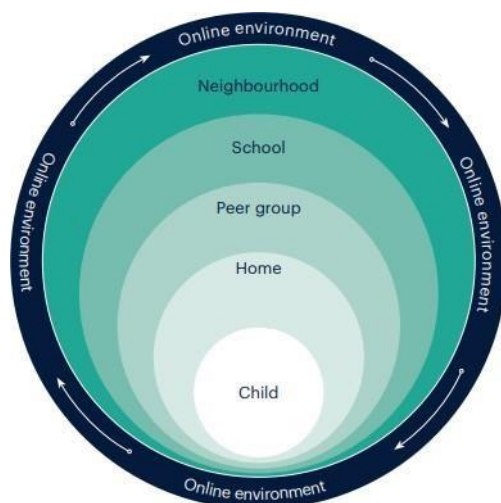
Abusive behaviour can happen to pupils in schools and settings and it is necessary to consider what abuse is and looks like, how it can be managed, what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'.

Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be vulnerable to peer-on-peer abuse due to the strength of peer influence, 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 be particularly vulnerable to abuse by their peers. Equally, abuse issues can sometimes be gender specific e.g. girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence (KCSIE 2020). 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. Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of peer on peer abuse within their settings and recognise that these will play out differently in single sex, mixed or gender imbalanced environments. (Farrer and Co., 2019)

Some children may be more likely to experience peer-on-peer abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

Children with Special Educational Needs

Children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and additional barriers can sometimes exist when recognising abuse in children with SEND.

These can include:
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Being more prone to peer group isolation than other children;
- The potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, we will always consider extra pastoral support for children with SEN and disabilities particularly when investigating any form of peer on peer abuse.
 (KCSIE, 2020)

Language

For the purposes of this policy the language used will not use the terms 'victim' and/or 'perpetrator'. 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. (Farrer and Co., 2019). The language used to children and parents in the reporting of any incidents that may have occurred could impact on any future rehabilitation of children and young people following any investigations that may occur and on their mental health more generally.

Types of abuse

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken.

It is important to note that some of the types of abuse described here may be generally thought to apply more to older children or to children with very disadvantaged backgrounds or who are at risk in other ways. This is not the case. Abuse can happen to anyone, at any time, in any context. Staff at Eden are encouraged, through training and school culture, to maintain an attitude of 'it could happen here' and not to dismiss concerns but to follow policy and procedures to investigate, report and record thoroughly.

Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidently before considering the action or punishment to be undertaken.

Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault etc.)

Sexually harmful behaviour from children is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another, sexual assault, rape or abuse.

Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of **any age and sex**. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 as described below.

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. In referencing sexual harassment, it is in the context of child on child sexual harassment. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment (KCSIE 2020).

Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or

relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the associated risks and understand the measures in place to manage these.

Bullying (inclusive of all types)
Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

Bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

Low-level disruption and the use of offensive language can in itself have a significant impact on its target. If left unchallenged or dismissed as banter or horseplay it can also lead to reluctance to report other behaviour.

Cyber bullying
Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass threaten or intimidate someone for the same reasons as stated above.

It is important to state that cyber bullying can very easily fall into criminal behaviour under the *Malicious Communications Act 1988* under section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the *Communications Act 2003, Section 127* which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour.

If the behaviour involves the use of taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the *Sexual Offences Act 2003*. Outside of the immediate support young people may require in these instances, the school will have no choice but to involve the police to investigate these situations. (see Eden Safeguarding and Child Protection Policy).

Sexting (Youth Produced Sexual Imagery)
Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can occur in any relationship, to anyone, whatever their age, gender or sexual preference.

However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18

(including themselves) on to someone else, young people may not even be aware that they could be breaking the law as these are offences under the *Sexual Offences Act 2003*.

Eden's procedure for dealing with sexting, which may constitute peer on peer abuse or may take place with or at the instigation of an adult, can be found in the *Eden Child Protection and Safeguarding Policy 2020,* Section 22.

Initiation/Hazing
Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

Up Skirting
The *Voyeurism (Offences) Act 2019* criminalised the act of 'up skirting'. The Criminal Prosecution Service (CPS) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Prejudiced Behaviour
The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Teenage relationship abuse
Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

It is known that this can happen between younger children if they see themselves as in a relationship with a peer, or if they are involved with an older young person.

When does behaviour become problematic or abusive?

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. Simon Hackett's continuum of sexual behaviours presented by children (taken from Farrer and Co. 2019, and reproduced below) can be a useful guide to measure the behaviour that has occurred and consider the circumstances around it.

Sexual behaviours continuum model

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

Hackett's continuum relates exclusively to sexual behaviours and is not exhaustive. The *Brook Sexual Behaviours Traffic Light Tool* can help professionals working with children to distinguish between three levels of sexual behaviour – green, amber and red, and to respond according to the level of concern.
https://www.brook.org.uk/training/wider-professional-training/sexual-behaviours-traffic-light-tool/

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
- 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

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.

Preventative Strategies

Eden Primary actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse. We recognise that peer on peer abuse can and will occur on any site even with the most stringent of policies and support mechanisms in place.

We take seriously our role in educating all governors, the senior leadership team, staff, pupils, and parents about this issue. This is achieved through the following strategies:

1. Training all governors, the senior leadership team, and staff on the nature, prevalence and effect of peer-on-peer abuse, and how to prevent, identify, and respond to it.
   This includes: Contextual Safeguarding; the identification and classification of specific behaviours, including digital behaviours; the importance of taking seriously all forms of peer-on-peer abuse no matter how 'low level' they may appear; and social media and online safety, including how to encourage children to use social media in a positive, responsible and safe way, and how to enable them to identify and manage abusive behaviour online;

2. Engaging parents on these issues by talking about them, 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; holding information events, parents' meetings and Curriculum Evenings about, for example, Relationships and Sex Education, Anti-Bullying, Behaviour or Online Safety, involving parents in the review of school policies and curriculum plans, and ensuring the visibility of this policy to all parents and carers;

3. Supporting the welfare of all our pupils by drawing on multiple resources that prioritise children's mental health, and by providing in-school counselling and therapy to address underlying mental health needs. Our staff are trained to meet low-level mental health difficulties faced by children;

4. Working with governors, senior leadership team, and all staff, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the Eden community;

5. Creating conditions in which our pupils can aspire to, and realise, safe and healthy relationships, supported by a planned programme of PSHE lessons and aligned with our school values of **Excellence, Responsibility, Respect, Community and Creativity** and our three school rules: **Ready, Respectful, Safe;** fostering a whole-school culture:
   - which is founded on the idea that every member of our school community is responsible for building and maintaining safe and positive relationships;
   - which creates a safe school environment in which violence and abuse are never acceptable, where students are able to develop trusting relationships with staff, and in which staff understand, through regular discussion and training, the importance of these relationships in providing children with a sense of belonging;
   - in which children feel able to share their concerns openly, in a non-judgmental environment, and have them listened to;
   - which proactively identifies positive qualities in children; nurtures these qualities; teaches and encourages children to think about positive hopes for the future; and supports pupils in developing small-scale goals that enable realistic ambitions;
   - which provides supervised activities to students that give them the experience of having their needs met that might otherwise apparently be met in abusive circumstances. These can include experiencing status, excitement, and a degree of risk;

6. Responding to cases of peer-on-peer abuse promptly and appropriately;

7. Ensuring that all peer-on-peer abuse issues are reviewed by our Designated Safeguarding Lead and Deputy DSLs as a team so that they can spot and address any concerning trends and identify students who may be in need of additional support. [This is done by way of a weekly senior leadership team meeting at which all concerns about children (including peer-on-peer abuse issues) are discussed];

8. Challenging the attitudes that underlie such abuse (both inside and outside the classroom);

9. Providing an appropriate and far reaching safety curriculum including these aspects which relate to peer abuse:

   - Healthy and respectful relationships
   - What respectful behaviour looks like
   - Consent
   - Gender roles, stereotyping and equality
   - Body confidence and self-esteem
   - Prejudiced behaviour
   - Sexual violence and sexual harassment

10. Fostering independence and understanding among our children at an age appropriate level. At Eden we signpost services such as the NSPCC, Childline, Thinkuknow and CEOP to children for support in case they don't feel confident raising an issue to staff, a parent or a peer, and to provide more opportunities for them to access support. As part of the planned curriculum, children are taught how to keep safe in the widest possible range of situations and circumstances involving themselves, siblings or peers. We document what children say and think. There are numerous opportunities in our school to gather 'pupil voice' and to involve children in developing relationships and community to create a positive ethos in school where all children understand the boundaries of behaviour before it becomes abusive.

11. At Eden our practice falls absolutely in line with this guidance from *Preventing and Tackling Bullying (DfE) 2017*: 'Schools which excel at tackling bullying (and peer abuse) have created an ethos of good behaviour where pupils treat one another and the school staff with respect because they know that this is the right way to behave. That culture extends beyond the classroom to the corridors, the dining hall, the playground, and beyond the school gates including travel to and from school. Values of respect for staff and other pupils, an understanding of the value of education, and a clear understanding of how our actions affect others permeate the whole school environment and are reinforced by staff and older pupils who set a good example to the rest.'

Multi-agency working

Eden Primary actively engages with both Barnet and Haringey Local Safeguarding Partnerships in relation to peer-on-peer abuse, and works closely with children's social care, the police, Barnet and Haringey MASH and other schools. The relationships that we have built with these partners are essential to ensuring that the Eden is able to prevent, identify early, and appropriately handle cases of peer-on-peer abuse.

They help the school to:
- develop a good awareness and understanding of the different referral pathways that operate in our local area, as well as the preventative and support services which exist;
- ensure that our families are able to access the range of services and support they need quickly;

- support and help inform our local community's response to peer-on-peer abuse;
- 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 children.

We actively refer concerns and allegations of peer-on-peer abuse where necessary to children's social care, the police, Barnet or Haringey MASH and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures. 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 alleged incident cannot appropriately be managed internally by the school itself) to try to address the issue alone – it requires effective partnership working.

Responding to concerns or allegations of peer-on-peer abuse

General principles

It is essential that all concerns and 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 environment.

Any response should:
- include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation;
- treat all children involved as being at potential risk – while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. The school should ensure that 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 sociocultural contexts – such as the child's/ children's peer group (both within and outside Eden); 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/ children's needs and to mitigate risk;
- the potential complexity of peer-on-peer abuse and of children´s experiences, and consider the interplay between power, choice and consent. Is the behaviour coercive? 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 should discuss the proposed action with the child/ children and their parents, and obtain consent to any referral before it is made. The school should 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. It is particularly important to take into account the wishes of any child who has allegedly been abused, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

Expected action to be taken by all staff

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 sections 1, 13 and 14 of the Eden Safeguarding and Child Protection Policy) so that a course of action can be agreed.

All staff should be alert to the well-being of children and young people and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer on peer abuse. Staff should be mindful of the fact that the way in which children will disclose or present with behaviour as a result of their experiences will differ (Farrer and Co. 2019).

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get a true, accurate account of the facts around what has happened, so that nothing is forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the words 'perpetrator' or 'victim', this can quickly create a 'blame' culture and leave a child labelled.

Eden staff are trained to talk to children and offer immediate support in a calm and consistent manner. Staff must not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters. It is incredibly important that staff do not view issues as 'banter' or ' just growing up' or compare them to their own experiences of childhood. Staff must consider each issue and each individual in their own right and talk to the DSL before taking action. If staff minimise the concerns raised it may result in that young person (or others) seeking no further help or advice.

Staff should also be mindful of contextual safeguarding and that wider safeguarding concerns may influence the child's account of the event(s). Alongside this, peer pressure and the impact of sharing information about the incident(s) may also influence a child's account.

Gather the Facts
As a general rule, actions should be taken by, in conjunction with, or on the advice of, the DSL or a deputy DSL.

In cases specifically relating to sexual violence and sexual harassment, part 5 of *Keeping Children Safe in Education, 2020* states that two members of staff (one being the Designated Safeguarding Lead) should be present to manage the report, where possible.

Receive, Reassure, React, Record, Report
In all circumstances, staff need to speak to all the children involved separately, gain a statement of facts from them and use **consistent language** and **open questions** for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?) A full and clear record of exactly what the young person has said, in their own words, should be made, given to the DSL and stored on CPOMS.

Consider the intent (begin to Risk Assess)
Has this been a deliberate or contrived situation for a young person to be able to harm another?

Points to consider:

What is the age of the children involved?
How old are the young people involved in the incident and is there any age difference between those involved? (In relation to sexual exploration, children under the age of 5, in particular 1-4 year olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however should not be overlooked if other issues arise (see following)

Where did the incident or incidents take place?
Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?

What was the explanation by all children involved of what occurred?
Can each of the young people give the same explanation of the incident? What is the effect on the young people involved? Is the incident seen to be bullying, ie regular and repetitive? Is the version of one young person different from another and why?

What is each of the children's own understanding of what occurred?
Do the young people know/understand what they are doing? eg do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from Children's Services Social Care.

Repetition
Has the behaviour been repeated to an individual on more than one occasion?

Has the behaviour towards an individual persisted after the issue has already been discussed or dealt with and appropriately resolved?

Determine the next course of action
The DSL will take immediate steps to ensure the safety of the child/all children affected.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made. If this is the case, once social care has been contacted and has made a decision about what will happen next, the referrer will be informed of the next steps to take.

Action will involve either:
- a referral to social care, police and/or other agencies and a safety plan, or
- safety plan/s alone.

In borderline cases the DSL may wish to consult with Barnet or Haringey MASH or Children's social care on a no-names basis (where possible) to determine the most appropriate response. Where the DSL considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual child/children in question might otherwise require it, the DSL

should contact children's social care and/or the police immediately and, in any event, within 24 hours of the DSL becoming aware of the alleged behaviour.

The DSL will discuss the concern or allegation with the agency and agree on a course of action, which may include:

1. **Manage internally with help from external specialists where appropriate and possible.** Where the alleged behaviour between peers is abusive or violent (as opposed to inappropriate or problematic – unless as stated above), scenarios 2, 3 or 4 should ordinarily apply. However, where support from local agencies is not available, the School may need to handle concerns or allegations internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).
2. **Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of the child/children and their family.** These services may, for example, include family and parenting programmes, responses to emerging thematic concerns in extra familial contexts, a specialist harmful sexual behaviour team, CAMHS and/or youth offending services.
3. **Refer the child/children to children's social care for a section 17/47 statutory assessment.** Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, a report to the police) is made immediately. This referral will be made to children's social care in the area where the/each child lives. Depending on the safeguarding procedures issued by the Local Safeguarding Partnership in that area, there will normally be an initial review and assessment of the referral, in accordance with that area's assessment framework. 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/each child who has experienced the abuse, and the/each child who was responsible for it, and the contexts to which the abuse was associated.
4. **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 involved sexual imagery does not involve any aggravating factors. All concerns or allegations will be assessed on a case by case basis, and in light of the wider context.

Safety Plans

Eden Primary will always carry out a safety plan in respect of:
- any child who is alleged to have behaved in a way that is considered to be abusive or violent
- any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child
- any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the DSL.

Where it is alleged that a child has behaved in a way that is considered to be inappropriate or problematic (as opposed to abusive or violent), the DSL will use their professional judgment – based on the particular concern or allegation raised, and the needs and circumstances of the individual children in question – to determine whether it would be appropriate to contact children's social care, and to carry out a safety plan.

Careful judgment and consideration are required as to whether alleged behaviour which might be judged to be inappropriate by an adult might actually be harmful to another child. We will consider consulting with children's social care if there is any doubt about this.

Careful consideration should also be given to a range of factors (which are outlined in Appendix 1) including the context, severity of the alleged behaviour, impact of the alleged behaviour on others, risk to others, and whether there are any patterns of behaviour occurring.

Where other children have been identified as witnesses to alleged abuse or violence, the DSL team will also consider whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them.

Informing parents
Where police/social care or other services allocate the role of involving parents to the school, the DSL will inform the parents as soon as possible. If services are not going to be involved then equally, information may need to be shared with parents. Parents will not be informed if doing so would put the child at further risk of significant harm. At Eden the decision to involve parents will be made jointly by the DSL (with a deputy DSL if necessary) and external services such as social care and the police if involved.

We believe that the best way to inform parents is face to face or by telephone, NOT by email. The nature of the incident and the type of harm or abuse a young person may be suffering can cause fear and anxiety to parents, whether their child is the child who was harmed or who harmed another.

Information sharing, data protection and record keeping
When responding to concern or allegation of peer-on-peer abuse, the School will:
- always consider carefully, in consultation with children's social care, the police and other relevant agencies, how to share information about the concern or allegation with the children affected, their parents, staff, and other students and individuals;
- record the information that is necessary for the school and other agencies to respond to the concern) or allegation and safeguard everyone involved;
- keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose;
- be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in *Working Together to Safeguard Children (July 2018)* and the HM Government advice on *Information Sharing* (updated in July 2018).

Following Up
Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

For the young person who has been harmed
What support they require depends on the individual and it is important to take the wishes of the child into account when providing support. It may be that they need or would like to take part in counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. If this is the case it is important that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature,

the young person may need support in improving peer groups/relationships with other young people. 'Circle of friends' or some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group. For example, a speaker on cyber bullying, safe touch etc. It may be that through the continued curriculum of PHSE and SMSC that certain issues can be discussed and debated more frequently.

If the young person feels particularly vulnerable it may be that a safety plan can be put in place for them whilst in school so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

For the young person who has displayed harmful behaviour
It is important to find out why the young person has behaved in such a way. It may be that they are experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may be necessary. Particular support from identified services may be necessary through an early help referral and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that they receive a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service).

If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation, the behaviour that the young person has displayed may continue to pose a risk to others, and so an individual safety plan may be required. If other agencies have been involved, this safety plan should also be completed via a multiagency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved, and by the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

The school may also choose a consequence in line with the behaviour policy, to allow the young person to reflect on their behaviour.

After care

It is important that following the incident(s) the young people involved continue to feel supported and receive help. Sometimes feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). Regular reviews with the young people following the incident(s) are imperative.

Applying consequences in line with our behaviour policy

We will need to consider whether any planned consequences may be appropriate for any child/children involved – these should address the abuse, the causes of it, and attitudes underlying it.

Consequences 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 must be balanced against the child's/children's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action Eden Primary 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.

We will consider the potential benefit, as well as challenge, of using exclusion as a response, recognising that even if this is deemed to be necessary, some of the measures referred to in this policy may still be required.

Review and on-going proactive work for a whole-school community Contextual Safeguarding approach

Eden's response to concerns or allegations of peer-on-peer abuse will form part of on-going proactive work in taking a whole-school community Contextual Safeguarding approach.

This response may involve the school working with the local authority or other schools or agencies to review policies and practice or to undertake, for example, a Contextual Safeguarding school audit or assessment.

In reviewing our safeguarding we may employ questions such as:

- What protective factors and influences exist within our school (such as positive peer influences, examples where peer-on-peer abuse has been challenged, etc.) and how can we bolster these?
- How (if at all) did the school's physical environment or children's routes to and from school contribute to the abuse, and how can the school address this, for example by improving safety, security and supervision, or by working with local safeguarding partners to mitigate the risks to students' safety whilst travelling to and from school?
- How (if at all) did the online environment contribute to the abuse, and how can we address this, for example by strengthening the way in which we encourages positive and safe use of the internet by pupils?
- Did wider gender norms, equality issues, and/or societal attitudes contribute to the abuse?
- What was the relationship between the abuse and the cultural norms between staff and students, and how can these be addressed going forward?
- 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, or to address any victim-blaming narratives from staff?
- How have similar cases been managed in the past and what effect has this had?
- Does the case, or any identified trend, highlight areas for development in the way in which we work with children to raise their awareness of and prevent peer-on-peer abuse, including by way of the PSHE curriculum and lessons that address underlying attitudes or behaviour such as gender and

equalities work, respect, boundaries, consent, children's rights and critical thinking and/or avoiding victim-blaming narratives?

- Are there any lessons to be learnt about the way in which Eden engages with parents to address peer-on-peer abuse issues?
- Are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?
- 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?
- Were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children?

Answers to these questions can be developed into an action plan that is reviewed on a regular basis by the SLT and the DSL team.

The following Appendix A is reproduced from the Farrer & Co Peer on peer abuse toolkit, 2019, Template peer-on-peer abuse policy.

Appendix A: Further information

What is peer-on-peer abuse?

Different 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. 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 or coercion. 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 to spaces in which they spend their time. Any response to concerns or allegations of peer-on-peer abuse therefore needs to consider the range of possible types of peer-on-peer abuse set out in a school's peer-on-peer abuse policy, and to capture the full context of children's experiences.[79] This can be done by adopting a Contextual Safeguarding approach and by ensuring that a school's response to alleged incidents of peer-on-peer abuse takes into account any potential complexity.

What is Contextual Safeguarding?

Contextual Safeguarding is about changing the way that professionals approach child protection when risks occur outside of the family, thereby requiring all those within a Local Safeguarding Partnership to consider how they work alongside, rather than just refer into, children's social care, to create safe spaces in which children may have encountered peer-on-peer abuse. In addition, it:

- 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 those online) 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.[80]

Identifying and assessing behaviour

Sexual Behaviour

As the NSPCC explains `children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour. As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is harmful sexual behaviours or HSB.'

This term has been adopted widely in the field, and is used throughout the NSPCC's, Research in Practice's and Professor Simon Hackett's harmful sexual behaviour framework (which should be used alongside the National Institute for Health and Care Excellence (NICE) guidelines on harmful sexual behaviour among young people), as well as the template peer-on-peer abuse policy.[81] For the purpose of that harmful sexual behaviour framework, and as adopted in the template peer-on-peer abuse policy, harmful sexual behaviours are 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.'[82]

Local authorities use a range of assessment and intervention frameworks which can be very helpful in assessing where any given behaviour falls on a continuum. The Assessment Intervention Moving on (AIM2) model is one example.[83]

Staff should always use their professional judgment and discuss any concerns with the DSL. Where an alleged incident involves a report of harmful sexual behaviour, staff should consult the DfE's Advice.[84]

Other behaviour

When drawing on Hackett's continuum, in order to assess the seriousness of other (i.e. non-sexual) alleged behaviour, it should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider. For

example, the issue of consent and the nuances around it, are unlikely to apply in the same way in cases where the alleged behaviour is reported to involve emotional and/or physical abuse, as it could in cases of alleged sexual behaviour which is reported to involve harmful sexual behaviour.

In addition, schools could be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional, physical behaviour and digital behaviour.[85]

It should also be recognised that the same behaviour presented by different children may be understood at different points on a spectrum, depending on the particular context. For example, an incident involving youth involved sexual imagery may be inappropriate in one context, for example, when exchanged between two 11 year old 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 starts out as inappropriate may escalate to being problematic and then abusive, either 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 becoming 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 student basis, but could also apply to a cohort of the student body, such as a year group or key stage, or across the student body as a whole.

Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which schools need to take a whole-school approach in order to prevent escalation. For example, where multiple boys are making inappropriate comments about girls, one-off sanctions are unlikely to be effective and wider

actions should be considered, such as implementing a bystander intervention model throughout the school, or arranging for an external person to deliver a year group intervention exercise; revising the school's SRE programme; and/or a discussion around whether anything is happening within the wider community that might be affecting the students' 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 to the concern(s)/allegation(s) is considered or suspected by the DSL to constitute peer-on-peer abuse, schools should follow the procedures set out in the template peer-on-peer abuse policy.

How can a child who is being abused by their peers be identified?

Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse and can include:

- 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, and

- abusive behaviour towards others.[86]

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

should be 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 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 his/her 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.

Safety plans[87]

In deciding (a) whether a safety plan would be appropriate; and (b) which children require a safety plan, the DSL should consider:[88]

- the extent to which a child may have experienced or otherwise been affected by the alleged behaviour, and the impact on them. This will depend not only on the child's involvement in or proximity to the alleged behaviour, but also on factors such as their possible wider circumstances and needs, their age and understanding, and the extent to which the alleged behaviour might trouble or distress other children, or expose them to inappropriate sexual behaviour,

- the importance of early intervention to address and to prevent escalation of inappropriate and/or problematic behaviours, and

- whether there are any wider safeguarding concerns about a child – for example, where a child's behaviour may be considered to be inappropriate or problematic on Hackett's continuum, or at risk of escalating, the DSL and/or external agencies may determine that a safety plan is required to control emerging risks.

In all cases where a safety plan is not considered to be appropriate, the school should nonetheless take steps to safeguard and support the/each child who is allegedly responsible for the behaviour, and any children affected by it, and should continue to monitor the situation. If risks increase consideration should again be given to developing a safety plan. A safety plan should be developed in consultation with key statutory agencies to whom any referral and/or report is necessary.

In developing a safety plan the school should:

- always have regard to *Keeping Children Safe in Education* (September 2018), and *Working Together to Safeguard Children* (July 2018), and make a referral to children's social care and, if appropriate, report to the police, whenever a child has been harmed, is at risk of harm, or is in immediate danger. Where a report of rape, assault by penetration or sexual assault is made, this must be reported to the police. Whenever a referral is made to children's social care and/or a report to the police, the school should inform children's social care and/or the police of the school's need to have a safety plan. Careful liaison with children's social care and/or the police should help the school to develop any such plan,

- consult children's social care and/or local MASH (or equivalent), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures regarding the concern(s) or allegation(s) and need to have a safety plan, and seek their agreement to the plan whenever possible,

- consult the police, where they are involved, to seek advice, and agreement whenever possible, on the safety plan, and ensure that the safety plan does not prejudice any criminal investigation(s), and that it protects all children involved in any such investigation(s) to the greatest extent possible,

- if an agency is not, for whatever reason, engaging, then the school should advise the agency that it intends to develop a safety plan for the/each child concerned. The school should also consider escalating their referral if they believe children's social care and/or the police should be engaged. The school should share its safety plan with children's social care and the police where they are involved. The safety plan should be consistent with any risk assessments or plans made by children's social care, the police, or any other professionals working with the child,

- give consideration to consulting and involving the/each child and their parents about the development of their safety plan, in accordance with any advice

given by children's social care and/or the police. Where a report has been made to the police, the school should consult the police, and agree what information can be disclosed to the/each child who is allegedly responsible for the behaviour and their parents. There may be other circumstances where there are legitimate obstacles presented to parental knowledge/engagement – for example, if there is a suggestion or concern that informing the parents will put the/any child at additional risk; in these cases the school should work closely with children's social care and/or the police to take advice on how best to proceed, and

- a safety planning meeting may be helpful to develop the safety plan. Where such a meeting is to be held, careful consideration will need to be given to whether the child presenting the alleged behaviour, and/or their parents should attend. Where a child or parent does not attend, their wishes and feelings should still be sought in relation to any proposed safety plan in advance of the meeting by a professional – in the case of the child, with a designated trusted professional with whom he/she has a positive relationship. A version of the plan which is appropriate for the child's age and level of understanding should be provided to the child and their parents. Efforts should also be made to ensure that they understand what is proposed and to seek their agreement to the arrangements.

These steps will help to ensure that the safety plan is appropriately tailored to the/each child's needs and will enable the school to work with others in an effort to meet these needs in the longer-term.

A safety plan should:

- be proportionate and not stigmatise the child/children allegedly responsible for or affected by the behaviour,

- set out relevant background information – including an overview of the context, the specific concern(s) or allegation(s), any relevant detail about the relationships, and any power differentials between the child/children allegedly responsible for the behaviour, and any children affected by it, the frequency of the alleged behaviour and any changes in it over time. Details should also be shared of action taken regarding the alleged concern(s) or allegation(s), and any advice provided by children's social care, and/or local MASH (or equivalent), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures, and/or the

police, and/or any other professional(s) working with the child/children,

- set out any relevant information regarding the child/children concerned. For example, any relevant medical information, any previous concerns about the child's/children's behaviour, needs or harm that the child/children may have been exposed to in the past. Information should be shared on their wishes and feelings regarding the proposed safety plan. Consideration may need to be given to having two or more separate but aligned safety plans for the child who is allegedly responsible for the behaviour, and the child or children affected by it,

- identify and assess the nature and level of risk that is posed and/or faced by the child/children in school such as that which may arise in relation to locations, activities, contact with particular students, or transport arrangements to and from school; and contexts outside the school, including at home, in relationships with friends, peer groups, interactions in the neighbourhood and/or during online activity,

- set out the steps and controls that can be put in place to reduce or manage any risk. Issues that may be addressed include:

  - how safety will be ensured in the classroom, out of the classroom, on transport, and during unstructured or extra-curricular activities, including trips and residential stays away from school. This may involve separating the child/children who present risk from other children who may be affected by the alleged peer-on-peer abuse,

  - how to ensure that the child/children reportedly affected by the alleged behaviour feel(s) supported, including by appointing a trusted member of staff (a 'critical friend') with whom they can speak if they have existing concerns or if there are any future developments which cause them concern,

  - how best to draw on any other trusting relationships where these exist, and create them where they do not, to provide the children concerned with support and a sense of belonging,

  - where relevant, how to manage the child's/children's behaviour – this can be done in a number of ways including, for example, by way of a de-escalation plan for staff which identifies any triggers, explains how their behaviour can escalate, sets out the function of the behaviour for the child

/children, and proposes an appropriate action or response to it; identifying language that should be used and avoided; a positive handling plan; or implementing controls and measures to reduce or manage any risk,

- whether restorative action would be appropriate and, if so, how best to take such action, bearing in mind the specific needs of the child/children concerned, and the appropriateness of any such action given the nature and seriousness of the concern(s) or allegation(s). Advice should be taken from children's social care, specialist sexual violence services, and the police where they are involved (if so, proposed restorative action could otherwise jeopardise a police investigation),

- whether any targeted interventions are needed to address the underlying attitudes or behaviour of the child/children, any emotional and behavioural disorders, developmental disorders, or learning difficulties, and/or to meet the child's/children's psychological, emotional or physical needs; drawing on local statutory, private and/or voluntary services as appropriate, and

- whether the behaviour is of such high risk that suitable controls cannot be put in place within the school setting which would enable it to be adequately managed. In this case consideration will need to be given to alternative plans for the child/children presenting the alleged behaviour. The principle that any child who is reported to have experienced peer-on-peer abuse should not have restrictions or controls placed on them as a result of another child's alleged behaviour should be given priority consideration.

- identify and consider how to build on strengths and positive aspects that the/each child possesses and/or is exposed to, such as those emanating from activities or lessons that the child enjoys and engages with; positive characteristics and skills that the child possesses; and/or trusting relationships with the child's family, other students or staff,

- assess any risks that are posed and/or faced by the wider school community (including all other students and, where appropriate, staff and parents) and identify any steps that the school can take to mitigate these risks. This may include:

  - consideration of how to support any students (and, where appropriate, staff and parents) who know about and/or may be affected by the alleged behaviour, and/or who may be required to participate in any investigation(s) – where these students have their own standalone safety plan, they should cross refer to and be consistent (where appropriate) with one another, and

  - consideration of work that can be undertaken with the wider staff or student population to help to protect children against peer-on-peer abuse in the future.[89] Careful consideration will need to be given to manging confidentiality for children affected by the alleged behaviour or engaged themselves in any such behaviour.

- set out the steps needed to implement the safety plan, including how to communicate with and what information should be shared with relevant staff members – in the strictest confidence – so that they are able to implement the actions set out in the plan and safeguard the children concerned appropriately, and

- be reviewed at regular intervals, or if there is a change in perceived risks or circumstances. Reviews should be carried out in light of the children's on-going needs to ensure that real progress is being made which benefits the children concerned.[90]

If at any stage the risk increases, there is a further alleged incident, or any individual child's needs escalate, the DSL should contact children's social care, and/or local MASH (or equivalent), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures, to determine the appropriate course of action. In the event that any new information is disclosed at any time indicating a child may have been harmed, is at risk of harm, or is in immediate danger, the school should again follow local safeguarding procedures in line with *Keeping Children Safe in Education* (September 2018), and *Working Together to Safeguard Children* (July 2018), and make a new referral to children's social care and, if appropriate, report to the police. Similarly any new information disclosed at any time regarding alleged rape, assault by penetration or sexual assault must always be shared with the police.

Appendix B: Resources

Identifying, assessing and responding to behaviour
The following resources are designed to help professionals working with children to identify, categorise, and respond appropriately to sexual behaviours by children:

Is this sexual abuse? This provides an analysis of the concerns being raised about peer-on-peer abuse by those who contact the NSPCC's helpline and Childline
https://learning.nspcc.org.uk/research-resources/2018/is-this-sexual-abuse

NSPCC website: protecting children from harmful sexual behaviour
https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour

NSPCC – what is healthy sexual development in young people?
https://www.nspcc.org.uk/keeping-children-safe/sex-relationships/sexual-behaviour-children/

The NSPCC's online training courses on managing sexualised behaviour in primary and secondary schools
https://learning.nspcc.org.uk/training/harmful-sexual-behaviour-hsb-schools

Educating staff, children and parents

Disrespect Nobody Home Office Campaign
https://www.disrespectnobody.co.uk/

AVA Prevention Platform
http://www.preventionplatform.co.uk/
Has produced guidance for schools on how to develop students' understanding and skills to prevent violence against women and girls (VAWG)

Tender
https://tender.org.uk/
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

Childnet
https://www.childnet.com/ufiles/Cyberbullying-guidance2.pdf
Provides cyber bullying guidance

https://www.thinkuknow.co.uk/professionals/resources/live-streaming/
Provides guidance for children and their parents on the nuanced features of live streaming and the specific risks children can face

Digital Awareness UK
https://www.digitalawarenessuk.com/
Provides digital awareness training to educators, parents and students and has produced video resources for students and parents, in collaboration with the Girls Day School Trust

Child Exploitation and Online Protection (CEOP) Command has developed to help you support young people with developing confident, healthy approaches to relationships and the internet. These include videos, toolkits and activities that can be used in lessons, assemblies, or shared with parents.

https://www.thinkuknow.co.uk/professionals/resources/

The NSPCC – has produced a range of resources aimed at educating children, staff, and parents about peer-on-peer abuse. This includes (but is not limited to)

- Online safety advice https://www.nspcc.org.uk/keeping-children-safe/online-safety/
- PANTS (The Underwear Rule) resources for parents, and staff https://www.nspcc.org.uk/keeping-children-safe/support-for-parents/pants-underwear-rule/
- Speak Out Stay Safe programme of assemblies and workshops which teaches children to speak out if they are worried https://learning.nspcc.org.uk/services/speak-out-stay-safe#:~:text=Speak%20out%20Stay%20safe%20is%20a%20session%20available,worried%2C%20either%20to%20a%20trusted%20adult%20or%20Childline
- Share aware campaign https://learning.nspcc.org.uk/research-resources/schools/share-aware-teaching