



INKBERROW PRIMARY SCHOOL

Child on Child Abuse Policy 2026

Including sexual violence, sexual harassment and harmful sexual behaviour between children

Responsibility	Mr Glenn Duggan-Seville, Head Teacher and DSL
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Approval by	Inkberrow Primary School Academy Standards Committee (ASC)
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Designated Safeguarding Lead	Mr Glenn Duggan-Seville
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Safeguarding is everyone's responsibility. At Inkberrow Primary School, staff maintain an attitude that "it could happen here" and act immediately in the best interests of the child.

Equality impact statement

This policy has been reviewed to ensure that it does not disadvantage any protected group or individual. Decisions will take account of age, developmental stage, disability, special educational needs, communication needs, race, religion or belief, sex, sexual orientation, gender reassignment and the child's wider circumstances.



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1. Context, scope and definition

This policy applies to all children at Inkberrow Primary School, from Reception to Year 6, and to all staff, governors, volunteers, visitors, contractors, wraparound care and club providers working on behalf of the school. It applies to behaviour on the school site, during remote learning, on visits and residentials, at Forest School, at clubs and activities, while travelling to and from school, and to online or off-site behaviour where it affects the safety or welfare of a child in school.

Child-on-child abuse is abuse of a child by another child or children. It may be physical, sexual, emotional or financial; may take place face to face or online; may be a single serious incident or a pattern; and may be carried out by an individual or a group. Children may experience abuse from children of any age or sex.

Abuse is abuse. It must never be dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”.

All staff must recognise that children can abuse other children and that even behaviour initially described as a joke, game or friendship difficulty may be harmful. Early, proportionate intervention protects children and helps prevent unsafe behaviour from becoming normalised.

Child-on-child abuse includes, but is not limited to:

1. bullying, including prejudice-related, discriminatory and online bullying;
2. physical abuse, such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
3. sexual violence and sexual harassment, including inappropriate or unwanted sexualised comments, touching or conduct;
4. consensual and non-consensual sharing of nude or semi-nude images or videos, including digitally manipulated or AI-generated material;
5. upskirting or any image taken under clothing without permission;
6. coercive or controlling behaviour, abuse within intimate personal relationships, where age-appropriate to the children involved;
7. initiation or hazing-type violence and rituals; and
8. causing someone to engage in sexual activity without consent.
- 9.

Vulnerability is not limited to any one group. Staff should be particularly alert where there are differences in age, size, status, social influence, ability, communication, SEND, emotional development or access to technology. Children who cause harm may themselves have unmet needs or have experienced harm; this never removes the need to protect others, but it informs a safe and child-centred response.

2. Responsibility and roles

The Academy Standards Committee and the Trust Board retain strategic oversight of safeguarding. The Head Teacher and DSL are responsible for ensuring that this policy is implemented, understood, resourced and reviewed. The DSL or a DDSL will lead the response to child-on-child abuse concerns and liaise with Children's Social Care, the police and other agencies as required.

All staff must:

10. read and understand the current Keeping Children Safe in Education Part One and the school Safeguarding and Child Protection Policy;
11. complete safeguarding induction and annual updates, including child-on-child abuse, harmful sexual behaviour and online safety;
12. notice, challenge and report inappropriate behaviour promptly;

13. listen to children without judgement, avoid leading questions and never promise confidentiality;
14. make a clear, factual and timely record on CPOMS, using the child's exact words where relevant; and
15. report immediately in person to the DSL or DDSL where a child is at risk of harm, has suffered harm, or urgent action is needed.

The child's wishes and feelings must be heard and taken seriously. They inform decisions, but staff must still share information where necessary to protect the child or another child from harm.

3. Purpose and linked policies

This policy provides a consistent, primary-age response to concerns about abuse or harmful behaviour between children. Its purposes are to prevent harm, support early identification, guide immediate action, ensure proportionate assessment and support, and secure appropriate recording and review.

It should be read alongside the current Trust and Inkberrow policies and procedures for:

16. Safeguarding and Child Protection;
17. Behaviour;
18. Anti-Bullying, including online bullying;
19. Online Safety and acceptable use;
20. Relationships, Sex and Health Education (RSHE) and PSHE;
21. SEND and inclusion;
22. Staff Code of Conduct, managing allegations and whistleblowing;
23. Health and Safety, educational visits and first aid; and
24. Suspension and Permanent Exclusion.

4. Legal and statutory framework

This policy has regard to the Children Acts 1989 and 2004, the Education Act 2002, the Equality Act 2010, the Sexual Offences Act 2003, the Voyeurism (Offences) Act 2019, the current statutory guidance Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026, and statutory guidance on Relationships Education, Relationships and Sex Education and Health Education.

The welfare of the child is paramount. Assessment and decision-making must be informed by the child's views, age, developmental stage and communication needs. Staff must share information lawfully and proportionately when it is necessary to safeguard a child.

5. Abuse and harmful behaviour

When a concern is raised, the school will consider what happened, what harm or risk is present, how immediate safety will be secured, what support and intervention each child requires, whether an external referral is needed, and what preventative action will reduce further risk.

Not all developmentally inappropriate behaviour is abusive, and not all sexual behaviour between children is harmful. At primary age, curiosity, imitation, impulsivity, limited understanding, SEND or exposure to inappropriate material may affect behaviour. However, staff must not make this judgement alone. The DSL will consider the behaviour in context, drawing on recognised developmental frameworks and specialist advice where appropriate.

The school will use neutral, child-centred language. "Child who has been harmed" and "child alleged to have caused harm" are preferred while facts are being established. The terms "victim" and "alleged perpetrator" may be used where required by statutory guidance or criminal justice agencies, but no assumption of guilt will be made pending investigation.

6. Types of child-on-child abuse

6.1 Physical abuse

Physical abuse may include hitting, kicking, nipping, pinching, shaking, biting, hair pulling, strangulation, use of an object or otherwise causing physical harm. Staff must first secure safety and attend to medical needs. The context, intent, repetition, imbalance of power, injury, fear caused and developmental understanding must then be considered. Serious injury, use of a weapon, strangulation, deliberate targeting or repeated harm must be reported to the DSL immediately.

6.2 Sexual violence, sexual harassment and harmful sexual behaviour

Any concern about sexual violence, sexual harassment or harmful sexual behaviour must be reported directly and immediately to the DSL or DDSL. It can occur between two children, within a group, in person or online. It may include unwanted sexual comments, sexualised name-calling, rumours, sexual jokes, displaying sexual material, coercion, unwanted touching, sexual assault, causing someone to engage in sexual activity, or recording and sharing sexual material.

Staff must make clear that sexual violence and sexual harassment are unacceptable and will never be tolerated. Behaviours such as grabbing bottoms or genitals, pulling down clothing, lifting skirts, "rating" bodies, sexualised taunting or pressuring another child for images must be challenged and reported. Dismissing such behaviour risks normalising it.

Upskirting means taking a picture under a person's clothing without permission, with the intention of viewing genitals or buttocks to obtain sexual gratification or to cause humiliation, distress or alarm. It is a criminal offence and must be referred immediately to the DSL.

For younger children, the DSL will distinguish between developmentally expected, inappropriate, problematic and abusive sexual behaviour by considering consent, spontaneity, mutuality, age and developmental difference, persistence, secrecy, coercion, distress, force and the impact on others. Specialist advice will be sought where necessary.

6.3 Bullying and prejudice-related behaviour

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another person or group physically or emotionally and often involves an imbalance of power. A single incident may still be serious and must be addressed, even where it does not meet the definition of bullying.

Prejudice-related behaviour is connected to protected characteristics or perceived difference, including race, religion or belief, sex, sexual orientation, gender reassignment, disability or SEND. It may also relate to family circumstances, care experience, poverty, appearance, language or culture. All discriminatory language and conduct must be challenged, recorded and followed up in line with the Behaviour and Anti-Bullying policies.

6.4 Online abuse

Online abuse may occur through messaging, gaming, social media, livestreaming, email, shared documents, devices or AI tools. It may include threats, abusive messages, exclusion, impersonation, humiliating images, doxxing, spreading rumours, coercion, sexual conversations, encouraging self-harm, digitally altering images or creating harmful deepfakes.

Staff must not ask a child to forward, download, print, copy or screenshot a nude or semi-nude image. Devices should be secured without searching or viewing the image, and the DSL must be informed immediately. The DSL will follow UKCIS guidance and contact the police or Children's Social Care where required.

6.5 Sharing nude or semi-nude images

Creating or sharing nude or semi-nude images or videos of children is a safeguarding concern, whether described as “sexting”, a joke, a dare or consensual sharing. This includes real, altered or AI-generated material that depicts or appears to depict a child. Staff must report the concern immediately to the DSL and must not view the material unless there is a clear, authorised safeguarding reason in line with national guidance.

6.6 Initiation or hazing

Initiation or hazing involves rituals or trials used to admit or control a child within a group. It may involve humiliation, threats, violence, coercion, forced acts or online recording. Although uncommon at primary age, it can occur in friendship groups, clubs, sports teams or online communities and must be treated seriously.

6.7 Abuse within children’s relationships

Some older primary-age children may describe a friendship as a boyfriend, girlfriend or partner relationship. Controlling, coercive, threatening, physical or sexual behaviour within such a relationship is not acceptable. The response must be developmentally appropriate and led by the DSL, with consideration of possible exploitation or wider harm.

7. Expected staff action

If a child is in immediate danger, secure safety and obtain urgent help first. Contact the DSL/DDSL without delay. Call 999 where emergency services are required.

When receiving a report, staff should:

- listen calmly and carefully; take the child seriously;
- reassure the child that they have done the right thing and are not to blame;
- avoid judgement, disbelief, minimisation or expressions of shock;
- not promise confidentiality; explain that information will be shared only with people who need it to keep children safe;
- use open prompts such as “Tell me what happened” and avoid leading or investigative questions;
- record the facts promptly on CPOMS, including the child’s exact words in quotation marks, date, time, place, witnesses and actions taken;
- report verbally to the DSL/DDSL immediately where there is harm, risk of harm, sexual behaviour, coercion, significant injury or a possible crime; and
- preserve possible evidence and do not search a device or ask for images to be forwarded.

Staff must not attempt to mediate, arrange an apology, interview children together, ask a child to confront another child, or begin restorative work before the DSL has assessed safety and suitability.

8. Recognising and assessing concerns

The DSL’s assessment will consider:

- the chronological age and developmental stage of every child involved;
- any difference in power, authority, size, social status, ability, communication or vulnerability;
- the full physical, verbal, sexual and online context;
- whether the behaviour involved force, coercion, bribery, threats, secrecy, planning or exploitation;
- the child’s understanding of consent, privacy, bodies and the impact of the behaviour;
- the effect on the child who has been harmed, including fear, distress, avoidance or changes in behaviour;

- whether the behaviour was spontaneous, mutual, one-off, repeated, escalating or part of a wider pattern;
- any previous concerns, contextual safeguarding information or off-site/online links;
- SEND, trauma, language, cultural or communication factors, without allowing these to excuse harm;
- the wishes of the child who has been harmed and the views of parents/carers, where it is safe to seek them; and
- whether siblings, friends, witnesses or other children may also be at risk or require support.

The school will gather only the information necessary to make an immediate safeguarding decision. Formal investigation of a possible crime is the responsibility of the police. Where external agencies are involved, the school will agree what enquiries it may undertake without prejudicing their work.

9. Points to consider

9.1 Where and when did the behaviour occur?

Consider whether the location was visible or isolated, whether supervision was appropriate, whether the incident occurred during lessons, playtime, lunchtime, clubs, changing, toileting, Forest School, transport, a visit, residential activity or online, and what environmental changes are needed.

9.2 What does each child understand?

Children's accounts may differ. Staff should record rather than reconcile those differences. Consider knowledge of body parts, privacy, consent, personal boundaries and online behaviour, and whether the child may be repeating something seen, heard or experienced.

9.3 Is there a pattern or escalation?

Review CPOMS and relevant school records. Consider repetition, targeting, increasing severity, multiple children, grooming, secrecy, retaliation or behaviour continuing after adult intervention.

9.4 Is contact continuing?

Consider shared classrooms, corridors, lunch and play spaces, clubs, wraparound care, transport, friendship groups, online contact, siblings and community activities. Any safety plan must minimise disruption to the child who has been harmed and should not place the burden of avoiding risk on them.

10. Decision-making, support and next steps

The DSL will decide, on a case-by-case basis, whether the concern can be managed internally, requires Early Help, should be referred to Children's Social Care, or should be reported to the police. The school may consult the local authority safeguarding team or MASH without naming a child where advice is needed. Decisions and reasons must be recorded.

10.1 Immediate safety and risk assessment

The school will take proportionate steps to protect all children while avoiding an assumption of guilt. This may include increased supervision, separate play or lunch arrangements, revised seating or groupings, safe adults and spaces, changes to clubs or transport, limits on device use, or temporary changes to teaching arrangements. For sexual violence or alleged sexual violence, a written risk and needs assessment must be completed immediately and kept under review.

10.2 Informing parents and carers

Parents/carers will normally be informed as soon as practicable and separately for each child, preferably through a direct conversation. The DSL may delay or withhold contact where doing so could place a child at

greater risk, interfere with a police or social care enquiry, or be contrary to agency advice. Information about another child will not be shared beyond what is necessary and lawful.

10.3 Support for the child who has been harmed

Support will be tailored to the child and may include regular check-ins with a named trusted adult, pastoral support from Mrs Nicola Taylor, adjustments to routines or learning, therapeutic or specialist referral, support with friendships, online safety action, and liaison with parents/carers and external agencies. The child should be able to continue their normal education as far as possible. Their wishes will be considered, but they will not be responsible for determining safeguarding action or sanctions.

10.4 Support and response for the child alleged to have caused harm

The school will seek to understand the child's needs and the reasons for the behaviour while maintaining clear boundaries and accountability. Support may include pastoral work, SEND assessment or review, Family Help, therapeutic or specialist intervention, work on consent and healthy relationships, online safety education, increased supervision and family support. Consequences under the Behaviour Policy may be applied on the balance of probabilities, provided they are fair, proportionate and do not prejudice a police or social care enquiry.

Suspension or permanent exclusion will be considered only in line with statutory guidance and Trust policy. Where a child cannot safely attend the same provision for a period, education and support will continue and the arrangements will be reviewed frequently.

10.5 Witnesses and the wider school community

Children who witnessed, received or shared information may also need reassurance, safeguarding assessment and support. Whole-class or year-group work may be appropriate where it can be delivered without identifying children or increasing risk. Staff will address rumours, retaliation and online discussion promptly while preserving confidentiality.

10.6 Aftercare and review

The DSL will set review dates and record outcomes. Support and risk controls must continue for as long as needed, including after an external investigation ends. A child's distress, remorse, fear or self-harm risk may emerge later. Reviews will consider whether arrangements remain effective, whether there has been further contact or retaliation, and whether each child feels safe and supported.

11. Preventative strategies at Inkberrow

Child-on-child abuse can occur in any school. Inkberrow seeks to prevent it through a calm, respectful culture in which children know that adults will listen and act. Prevention is embedded across safeguarding, behaviour, curriculum, pastoral care and site management.

Our approach includes:

- age-appropriate Relationships and Health Education and PSHE, including consent, personal boundaries, respectful friendships, trusted adults and how to seek help;
- the No Outsiders programme and wider curriculum work on equality, belonging and respectful difference;
- online safety teaching across the curriculum, including safe use of messaging, gaming, images and AI;
- teaching children the correct names for body parts, the difference between public and private, and that they can say no to unwanted touch;
- the Inky Great Learner values - Determined, Keen to Learn, Focused, Organised and Well-behaved - alongside the school motto "Love to Learn, Learn to Care"

- clear behaviour expectations, consistent challenge of sexist, homophobic, transphobic, racist, ableist or sexualised language;
- pupil voice, School Council and opportunities for children to identify places or times where they feel less safe;
- accessible reporting to any trusted adult, including the class teacher, Pastoral Lead, DSL or DDSL;
- thoughtful supervision of playtimes, lunchtimes, toilets, changing, corridors, clubs, wraparound care, Forest School, visits and residential;
- staff training to recognise harmful sexual behaviour, online abuse, SEND vulnerability and barriers to disclosure; and
- analysis of CPOMS, behaviour, bullying and attendance information to identify patterns, locations, groups or emerging risks.

Preventative teaching will be inclusive and developmentally appropriate. It will not imply that children are responsible for preventing abuse. Responsibility always rests with the person displaying harmful behaviour and with adults to act to protect children.

12. Monitoring, review and confidentiality

The DSL will monitor the implementation and impact of this policy, including the quality and timeliness of recording, referrals, risk assessments, support and reviews. Themes and anonymised safeguarding information will be reported to the Head Teacher, ASC and Trust as appropriate. This policy will be reviewed at least annually and sooner following statutory change, a significant incident or identified learning.

Information will be shared on a need-to-know basis in accordance with safeguarding duties and data protection law. Staff must not discuss cases with colleagues, children or parents who are not directly involved in safeguarding or supporting the children. Records will be retained securely within the child's safeguarding file.

Further information

Organisation	Guidance/resource	Web address
Department for Education	Keeping Children Safe in Education 2026	https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
Department for Education	Working Together to Safeguard Children 2026	https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
Department for Education	Behaviour in schools	https://www.gov.uk/government/publications/behaviour-in-schools--2
Department for Education	Suspension and permanent exclusion from maintained schools, academies and pupil referral units in England	https://www.gov.uk/government/publications/school-exclusion
Department for Education	Teaching online safety in schools	https://www.gov.uk/government/publications/teaching-online-safety-in-schools
Department for Education	Searching, screening and confiscation at school	https://www.gov.uk/government/publications/searching-screening-and-confiscation
UK Council for Internet Safety	Sharing nudes and semi-nudes: advice for education settings working with children and young people	https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
NSPCC	Harmful sexual behaviour	https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour



Organisation	Guidance/resource	Web address
NSPCC	When to call the police	https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/child-protection/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf
Lucy Faithfull Foundation	Shore: support for young people concerned about sexual thoughts or behaviour	https://shorespace.org.uk/

Appendix 1: Initial response and decision record

Use with the CPOMS record where directed by the DSL. Do not duplicate sensitive information unnecessarily. Complete factual information only.

Child/children making the report	
Child/children alleged to have caused harm	
Report received by	
Date and time	
Location of incident	
Other adults or children present	
Immediate safety/medical action	

Child's account / summary of report

Record the child's exact words where relevant. Do not ask leading questions. Include what happened, when and where, who was present, and what the child says they need now.

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Initial action and safety arrangements

Child/person	Action taken	By whom	Time/date

Notifications and referrals

Person/agency	Needed?	Reason	Method	Date/time	By whom
DSL/DDSL					
Head Teacher					
Parents/carers					
Children's Social Care/MASH					
Police					
Health/other					

DSL decision

- ☐ Manage internally
- ☐ Early Help / family support
- ☐ Refer to Children's Social Care / MASH
- ☐ Report or consult police
- ☐ Other specialist advice/support

Decision, rationale and statutory guidance considered:

Completed by: _____ Role: _____ Date/time: _____

Review date: _____ Recorded on CPOMS: ☐ Yes ☐ No

Appendix 2: Developmental and risk indicators

This guide supports professional judgement; it is not a diagnostic or scoring tool. The DSL should consider the whole context and seek specialist advice where needed.

Indicator	Developmentally expected / exploratory	Inappropriate or problematic	Abusive / violent / urgent
Consent and mutuality	Spontaneous, mutual, easily stopped.	One-sided, unwanted, persistent or ignores boundaries.	Force, threats, coercion, bribery, exploitation or no consent.
Age/development	Similar age and developmental understanding.	Noticeable difference in age, ability, status or understanding.	Significant power imbalance or targeting of a vulnerable child.
Emotional response	Light-hearted; no fear, shame or distress.	Confusion, discomfort, embarrassment, anxiety or secrecy.	Fear, trauma, pain, humiliation, intimidation or retaliation.
Frequency/pattern	Occasional and not intrusive.	Repeated, compulsive, escalating or resistant to redirection.	Planned, predatory, organised, repeated harm or multiple children affected.
Type of behaviour	Age-expected curiosity within clear privacy boundaries.	Explicit language or behaviour beyond developmental expectation; online sexualised conduct.	Sexual violence, penetration, use of objects, recording, image-sharing, blackmail or significant injury.
Context	No exposure, grooming or wider safeguarding concern identified.	Possible exposure to sexual content, trauma, poor boundaries or unmet needs.	Suspected abuse, exploitation, trafficking, criminal involvement or immediate danger.
Any sexual violence, coercion, significant power imbalance, sharing of sexual images, serious physical injury or suspected crime must be reported to the DSL/DDSL immediately.			

Appendix 3: Staff response pathway

1. Receive	Listen, take seriously, reassure, do not promise confidentiality, avoid leading questions.
2. Protect	Secure immediate safety and medical help. Keep children apart if needed without confrontation or blame.
3. Report	Tell the DSL/DDSL immediately for harm, risk of harm, sexual behaviour, possible crime or urgent concern. Never rely on CPOMS alone for an urgent concern.
4. Record	Make a factual CPOMS entry promptly. Use exact words, record date/time/location/witnesses and action taken.
5. Preserve	Do not search devices, view/forward sexual images, arrange mediation or conduct an investigation.
6. DSL assessment	Consider risk, developmental context, the child's wishes and whether to manage internally, use Early Help, refer to Children's Social Care or involve police.
7. Safety plan	Complete and review a written risk and needs assessment where required; support all children and minimise disruption to the child harmed.
8. Parents/agencies	Inform parents separately unless unsafe or contrary to agency advice. Liaise with external agencies and record reasons for decisions.
9. Follow-up	Review safety, support, attendance, retaliation, rumours and online contact. Record outcomes and continue support as needed.

Appendix 4: Individual child risk and safety plan

Use for sexual violence or alleged sexual violence and whenever the DSL judges that a written plan is required. There must be no assumption of guilt. Consider the needs of the child harmed, the child alleged to have caused harm, witnesses and the wider school community. Review frequently and after any change.

Name(s) and date(s) of birth	
Date/time of incident and report	
Reason for assessment / concise incident summary	
Where did it happen and who was involved?	
Has violence, injury, coercion or a threat been used?	
Could a crime have occurred? Police advice/reference	
Previous or related concerns; pattern or escalation	
Evidence of planning, secrecy, grooming or retaliation	
Child's wishes, feelings and communication needs	
Parents/carers informed? If not, record safeguarding reason	
Professionals/agencies involved and roles	
Intended safety and wellbeing outcomes	



Appendix 4 continued: contact and environmental considerations

Do the children share a classroom, teaching group or intervention?

Do they share playtime, lunchtime, toilets/changing arrangements, clubs or wraparound care?

Do they share transport, walking routes, friendship groups, siblings or community activities?

Are they likely to contact each other online or outside school?

What contact restrictions or supervision are necessary and proportionate?

How will the child who has been harmed retain normal routines and access to education?

What are the safe spaces, named adults and reporting arrangements for each child?

What support is required for witnesses, siblings, staff or the wider group?

Appendix 4 continued: risk controls and review

Person/group at risk	Nature of risk	Existing protective factors	Initial risk S×L	Additional controls/actions	Owner/date	Revised risk S×L
Child harmed						
Child alleged to have caused harm						
Other children/witnesses						
Staff/others						

Risk rating

Severity: 1 negligible, 2 minor harm, 3 moderate harm, 4 major harm, 5 fatal or life-changing harm.

Likelihood: 1 rare, 2 unlikely, 3 possible, 4 likely, 5 almost certain. Risk score = severity × likelihood.

Actions and sign-off

Action/referral	Yes/No/N/A	Date/reference	Outcome/next step
Police informed/consulted			
Children's Social Care/MASH referral			
Early Help/family support			
Health/CAMHS/specialist service			
Internal pastoral/SEND support			
CPOMS records and documents linked			

Assessment completed by: _____ Role: _____

Signed: _____ Date/time: _____

DSL approval: _____ Date/time: _____

Review dates and outcomes:

Review date	Children consulted / views	Changes to controls/support	Next review / closed by