FARRER&Co

Peer-on-peer abuse toolkit

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Toolkit 1:
Guidance on peer-on-peer abuse policy

The Safeguarding Unit at Farrer & Co has produced the attached template peer-on-peer abuse policy, which encapsulates a Contextual Safeguarding approach, in collaboration with Dr Carlene Firmin, MBE. Dr Firmin is a leading expert on peer-on-peer abuse, and the driving force behind Contextual Safeguarding in this country. Following publication of an interim version of the toolkit in December 2017, the Safeguarding Unit and Dr Firmin have collaborated with the following experts to produce this revised version: Professor Andy Phippen; Dr Jonty Clark OBE; Judith Azzopardi; Cathy Wood; Julie Dugdale; Dr Jenny Lloyd, and Katie Rigg.

What is peer-on-peer abuse?

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), friendships, and wider peer associations.[1]

Peer-on-peer abuse can take various forms, including (but not limited to): serious bullying (including cyber-bullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence.[2]

Online peer-on-peer abuse is any form of peer-on-peer abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, peer-on-peer grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.[3]

What is Contextual Safeguarding and what does this mean for your school?

In order to prevent and tackle peer-on-peer abuse, schools can adopt a Contextual Safeguarding approach, which is an approach to understanding, and responding to, the risk of harm to which children can be exposed, and/or harm which they can experience, beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools, and online can feature violence, coercive control, and abuse. Parents[4] can have little influence over these contexts, and the risk of harm to which children can be exposed, and/or harm which they can experience, outside of the family, can undermine parent-child relationships.

Therefore, children's educators and social care practitioners need to engage with individuals and sectors that do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these extra-familial contexts is a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that children are vulnerable to, and can experience, abuse in a range of social contexts.

Primary school aged children

Although some aspects and principles of the toolkit are applicable to primary school aged children, some are not. For example, some of the specific forms of peer-on-peer abuse set out in the template policy (for example, domestic violence and abuse) will not be relevant for primary school aged children; however, other forms such as bullying, sexualised language, and/or sexualised behaviour will be relevant.

In addition, the response to concerns/allegations of peer-on-peer abuse will differ depending on the age of the child or children in question. For example, the police will take a welfare rather than a punitive approach towards children aged under 10, which is the age of criminal responsibility in England and Wales.

As explained by the NSPCC, Research in Practice and Professor Simon Hackett in their harmful sexual behaviour framework "it should be standard professional practice to view the sexual behaviours of children...along a continuum, ranging from normal to abusive...it is vital that professionals consider the continuum in line with children's development. Some behaviours that are considered normative in earlier childhood, may be highly abnormal and inappropriate in adolescence. Similarly, some behaviours that are part of normal adolescent sexual development are highly problematic if expressed by young children... In particular, younger children (under 12) exhibiting harmful or problematic sexual behaviours should be

identified early to prevent the possible establishment of persistent patterns later". They also explain, in the framework, that "guidance indicates that professionals should avoid analysing single behaviours, and instead consider the sexual behaviour within a wider context...", and that "assessment should consider wider welfare needs and concerns, including family issues, and social, economic, and developmental factors...and should be dealt with differently to adolescents, who are likely to have different motivations for their behaviour..." Reference is also made to the fact that "Professionals should notice any changes in the sexual behaviour of younger children that appear to be out of step with their developmental stage and level of understanding as such behaviours may be reflective of sexual victimisation, physical abuse, family violence, neglect, poor parenting or exposure to sexually inappropriate material...".[5]

The NSPCC has produced valuable guidance on the stages of normal sexual behaviour, and online training on *Managing sexualised behaviour in schools* – primary and secondary, which aims to help such schools to identify and respond appropriately to problematic and harmful sexual behaviour.[6]

Here are a number of key points that schools should address in introducing, designing, and implementing a peer-on-peer abuse policy

Introducing your peer-on-peer abuse policy to the school community
The foundation of any progressive policy should be considering the rights of the child. Guidance can be taken from the United Nations Convention on the Rights of the Child,[7] which makes it clear that a child has a right to be protected from abuse and neglect (Article 19), and sexual exploitation (Article 34). However, there are other children's rights that need to be acknowledged, such as the child's opinion (Article 12), freedom of expression (Article 13), freedom of thought, conscience and religion (Article 14), privacy (Article 16) and education (Article 28). In aspiring to ensure that children are free from harm, we should be mindful that their rights are not eroded in order to keep them 'safe'.

Schools should give careful consideration as to how they present their peer-on-peer abuse policy to their governors, senior leadership team, staff, volunteers, students and parents.

A key message to convey is that any school that does not have such a policy in place now is failing to address peer-on-peer abuse, and that your school:

- regards the introduction of the policy as a

preventative measure, and does not feel it is acceptable to merely take a reactive approach to peer-on-peer abuse in response to alleged incidents of it,

- recognises increasing national concern about this issue, and in order to ensure that its students are safe, wishes to implement the policy, and

- encourages parents to hold the school to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any of their peers, they should inform the school so that it can ensure that appropriate and prompt action is taken in response.

Schools should also secure commitment from their governing body and senior leadership team to the policy, and should provide them with training on it.

Overarching policy
The policy should serve as a school's overarching policy on any issue that could constitute peer-on-peer abuse. Schools will be aware that *Keeping Children Safe in Education* (September 2018)[8] requires them to refer to peer-on-peer abuse in their child protection policy. As such, if a school introduces a separate peer-on-peer abuse policy, those two policies should cross-refer to each other, and appropriate cross-reference should also be made in, and consistency ensured between, other relevant policies in the school's suite of safeguarding policies. We have included (i) a template youth involved sexual imagery policy at Appendix B in the hope that this is helpful to schools, should they not already have one in place, and if/when considering their design and implementation of a peer-on-peer abuse policy; and (ii) an example weapons policy for schools at Appendix C to draw upon if/where necessary, according to their particular safeguarding context.[9]

Schools should consult their Local Safeguarding Partnership's[10] Safeguarding Policy and Procedures, and any relevant practice guidance issued by it when responding to concerns/allegations of peer-on-peer abuse.

Schools will also be aware of the advice which has been issued by the Department for Education on sexual violence and *Sexual Harassment Between Children in Schools and Colleges* (updated in May 2018) (DfE's Advice). Schools should consult this, and any other advice and guidance referred to within it, as appropriate, if relevant to any concerns/allegations raised in relation to peer-on-peer abuse.

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Specifically tailored

We have produced a template peer-on-peer abuse policy with the intention that it is helpful for schools to draw upon to inform their own policy. It is vital that schools tailor their peer-on-peer abuse policy according to their particular safeguarding context, the needs of their students, and the specific risks to which their students are or may be exposed – both in and outside of the school community (including online). This will help to ensure that the policy is fit for purpose, 'owned' by the school, and implemented in practice. Schools ought to develop a whole-school community Contextual Safeguarding approach defined in the template policy (see Toolkit 2) to peer-on-peer abuse, and ensure that it is focused on all forms of peer-on-peer abuse, and across a spectrum of behaviours – including concerns/allegations of inappropriate behaviour through to those of serious sexual assault.

In order to ensure that the policy is appropriately tailored to a school's specific safeguarding context, it should conduct a comprehensive consultation on the policy, and seek input on it from key members of staff, as well as students and parents – for example, through a steering group. This should secure a positive and enthusiastic level of 'buy-in', particularly from students and parents – where the school is acting proactively, and seeking their contribution from the outset to help build an effective policy, as opposed to conducting the exercise in response to a safeguarding incident.

Schools should identify a number of questions to ask at the start of their policy's design, to ensure that it is specifically tailored, which could, by way of example, include:

- Do we have a clear and full understanding of what constitutes peer-on-peer abuse?

- What have we experienced as a school community in the past in terms of peer-on-peer abuse, and have we learned from it? If so, how?

- Do we take a whole-school community Contextual Safeguarding approach to preventing and responding to peer-on-peer abuse?

- Do we have any concerns about existing peer-on-peer relationships and, if so, what are these?

- Are there particular features or types of peer-on-peer abuse that our students are exposed to, and do our policies and procedures appropriately address these? For example, are any of our students exposed to gang violence? Do any of our students carry weapons? Is prejudice-based bullying a problem?

What about cyber-bullying or online grooming?

- Do we have a comprehensive and age appropriate programme of relationships and sex education delivered by expert staff? If so, is it effective and designed in such a way that our students engage positively with it?

- Do we know of any physical or online locations which may be particularly vulnerable to being used by students to threaten or inflict abuse on other students? (One practical approach to this question could, for example, be to walk around the school, and talk to students, and ask them about the physical spaces, and any concerns they may have about them, and to ask students to map out 'hot and cold zones'). In respect of the online locations, do we have appropriate internet monitoring and filtering in place in the school setting?[11]

Risk assessment

Schools should also:

(1) Conduct a risk assessment to determine the risks to which their students are or may be exposed, and assess and monitor those risks.

The risk assessment should consider:

- the nature and level of risk of the different variants of peer-on-peer abuse within the school,

- the makeup of the student body, including specific characteristics that might affect their vulnerability to peer-on-peer abuse such as, for example, gender, age, learning difficulties, special educational needs and/or disabilities, sexual orientation and/or religious belief,[12]

- which of these students are affected, or are more at risk of being affected, by peer-on-peer abuse,

- any trends, and

- the various sociocultural contexts to which those students are associated including, for example, their peer group (both within and outside the school), family, the school environment, their experience(s) of crime and/or victimisation in the local community, and their online identities - which may impact on their behaviour and engagement in school.

This risk assessment:
- is a proactive assessment of the general risks facing the student body. It is distinct from any risk assessment(s) that may be required following a concern or allegation of peer-on-peer abuse (these

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responsive risk assessments are discussed in this toolkit in the context of safety plans),

• should inform the peer-on-peer abuse policy, and

• should feed into and inform the governors' oversight of safeguarding, and any safeguarding risk register(s) that they may choose to put in place.

(2) Put in place action plans to address any identified risks and keep these under regular review.

Appropriate approach and response
Schools should adopt a zero-tolerance policy towards all forms of peer-on-peer abuse, and ensure that no form of any such abuse (no matter how 'low level' it may appear) is ever dismissed as a joke or banter.

Schools should identify and handle cases sensitively, appropriately, and promptly. They should ensure that they have effective policies, procedures and practices in place to prevent, identify, and appropriately respond to cases of peer-on-peer abuse.

Robust safeguarding policies and procedures which are effectively implemented, training for staff on identifying and managing cases (see further below), and providing resources to staff to assist in the consistent identification and recognition of abuse, are key. In order to provide an appropriate response to peer-on-peer abuse, schools (i) should pose themselves a number of questions on gender and other equality issues that can help to inform the nature of the phenomena; and (ii) may need to consider gender issues including, for example, the extent to which girls access STEM subjects (if the school is a mixed provision), or the extent to which aggressive behaviours are displayed by boys, and how boys are responded to differently.

How much of your school's wider equalities approach to issues such as ethnicity, disability, sexuality and religious affiliation supports its peer-on-peer abuse policy?
Schools ought to take a safeguarding approach to all children in their care who are involved in concerns about, and/or allegations of, peer-on-peer abuse, including those who have allegedly experienced such abuse, and those who have allegedly been responsible for it, in addition to any sanctioning work that may also be required for the latter. Therefore, it may be helpful to see individuals involved as children first – who may have been victimised and/or displayed harmful behaviours, rather than using the term 'victim' and/or 'perpetrator' in a school's peer-on-peer abuse policy, and in any other documents in its safeguarding suite of policies. 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, for example, peers. Examples of support and intervention services can be found in Appendix E, and in Annex A to the DfE's Advice.

The point at which an allegation of peer-on-peer abuse may become substantiated – and therefore the peer-on-peer incident is no longer alleged – may differ in cases. However, for ease of reference, this guidance, the template peer-on-peer abuse policy, and the relevant appendices use the terms 'alleged' and 'allegedly' throughout.

The template peer-on-peer abuse policy states that the school has chosen not to restrict its approach to peer-on-peer abuse to just children (defined as being those under the age of 18), but instead to adopt a wider interpretation of its safeguarding responsibilities so that they apply to all students, regardless of their age.

Although the starting point is that a school's response to peer-on-peer abuse should be the same for all students, regardless of age, there may be some different considerations in relation to, for example, a child aged under 10 (as set out above), or a student aged 18 or over, in terms of how local agencies and/or partners respond.[13]

Being alert to and monitoring changes in student behaviour
Maintaining and monitoring behaviour incident logs provides one route to a summary assessment of any behavioural trends that may be emerging across a cohort of students, at a particular time of day or in a specific location. It is important that the language used to describe alleged student behaviour is clear and avoids using euphemisms which can prevent potential patterns from being identified. Behaviour incident logs can also provide a summary account of the nature of the actions that staff take to address such behaviours – particularly those on the inappropriate and problematic end of the behaviours spectrum.[14]

The internet and social media
The internet can provide students with extraordinary positive opportunities, including for learning, sharing information and developing key skills, but it can also facilitate harm. Schools should focus on enabling and empowering their students, staff and parents to navigate the online world in a safe, responsible and positive way via relevant, accurate and engaging training and education. With respect to students, this should involve developing their understanding and

education about social media from an early age, and before they start to engage with social media platforms. This can be done gradually by, for example, weaving age-appropriate discussions into their curriculum, and encouraging safe and positive use of social media.

Any such discussions should:

- reinforce (as appropriate) that most social media platforms require users to be at least 13 years of age before they sign up (and some sites have recently raised this age limit to 16),[15] and acknowledge that a significant number of children, in some cases young children, nevertheless access these platforms by providing a false date of birth,

- explain these age limits (as appropriate) to children, the reasons for them, and the consequences of breaching them. Although not illegal, under-age use of social media constitutes a breach of the platform's terms and conditions. It can also mean that these children are exposed to material that is not appropriate for their age, and to safeguarding risks. Where a child provides a false age of 18 or over, it can mean that they access sites without the additional protections that some sites provide to users under the age of 18. It also means that any liability for harm from the service provider can be waived, because the user has invalidated terms and conditions. If discovered, it can also lead to the child's profile, and any content that they shared, being deleted,

- celebrate difference. Not all children want to be on social media and children should never feel pressured into making choices that are not right for them,

- always encourage children to share any concerns they may have from using the online environment, including social media – even if they are accessing a site that they should not and, where possible, provide reassurance to them that they will not be punished for doing so, and

- provide children with advice on how to (i) share their concerns with staff in school, (ii) report inappropriate or harmful online content to a platform provider or an independent agency,[16] and (iii) seek support and advice if they are worried, either from the school or from an external body.[17]

Schools should have a comprehensive and age-appropriate plan to address social media use, which may include, for example:

- developing online and/or social media charters or agreements with students and parents. Charters are a set of agreements which everyone should feel comfortable adhering to. They can be used to (i) encourage kind, safe, and responsible internet use; and (ii) provide a useful reference point for students, parents, and staff if any concerns or allegations should subsequently arise by enabling the school to revisit what was previously agreed. A useful starting point for creating a charter can be a school's set of values and/or any behaviour codes. Involving children in the creation of these documents has two benefits. First, it helps them take ownership of what they do online, and second, it can provide an opportunity to open up useful group discussions. Further information on, and examples of social media charters, can be found here,

- holding in-class discussions about the social media sites and applications that children like and why. The age at which the school introduces these discussions will vary depending on the particular context of the school and its students. It may need to be lowered where, for example, staff become aware that children are accessing sites at an earlier age, and

- drawing on engaging and accurate resources and content where possible.[18]

It is also vital to educate, train and empower staff and parents (see further below), so that they are equipped to help students to take full advantage of the opportunities provided by the internet, and to navigate the online world safely.

Safety plans

Various terms are used to describe the processes undertaken by schools in relation to the management of peer-on-peer abuse, and the associated documentation used. These include an 'individual risk assessment', a 'risk and needs assessment', a 'support plan', a 'risk management plan', a 'segregation plan', and a 'prevention plan'. The DfE's Advice requires schools to conduct a 'risk and needs assessment' following any report of sexual violence and to consider, on a case by case basis, whether such an assessment is required following a report of sexual harassment. This assessment should consider the 'victim', the 'perpetrator', and 'all the other children (and, if appropriate, adult students and staff)'.

A safety plan is proposed in this toolkit in order to provide schools with a comprehensive framework that they can draw on when identifying, assessing and mitigating risks, and when considering how to support students and other members of the school community in the context of peer-on-peer abuse.[19] Any such plan that is put in place should be as clear and user friendly as possible.

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Communication and information sharing

When responding to a concern or allegation of peer-on-peer abuse, schools should consider carefully, in consultation with children's social care, the police and other relevant agencies (where they are involved), how to share information about the concern or allegation with the student(s) affected, their parents, staff, and other students and individuals. When considering whether and how to share information, schools should consider a number of factors, in consultation with the above (as relevant), and in accordance with the HM Government advice on *Information Sharing* (updated in July 2018).[20]

These factors include (but are not limited to) ensuring as far as possible that the information sharing (a) does not prejudice any investigation(s); (b) keeps individuals' personal sensitive data confidential unless it is not appropriate to do so (for example, where a school needs to share information in order to enable individuals to safeguard and support a child); (c) shares information about a child with that child's parents unless there are legitimate reasons not to do so; and (d) keeps individuals updated on developments where possible and appropriate.

Data protection and record keeping

Data protection practices relating to peer-on-peer abuse should be in line with the school's data protection policies and notices. By the same token, the school's policies and notices need to reflect and allow sufficiently for safeguarding practices. This includes setting out clearly to parents and students what these practices are, and why they are needed, in a privacy notice.

Working Together to Safeguard Children (July 2018)[21] sets out to correct common myths about the laws of privacy, data protection and confidentiality; fears that can hamper effective keeping and sharing of records. The bottom line is that, if there are legitimate safeguarding concerns about a child, then data protection law will allow schools and professionals to record, share and retain even the most sensitive personal data as necessary to support their policies (even when it is not feasible to obtain consent).

What is important is that the records that schools do keep relating to concerns or allegations of peer-on-peer abuse are accurate, clearly describe the nature of the alleged behaviour without using euphemisms, and contain adequate information for the purpose[22]. These records – including in behaviour incident logs, individual safety plans, and records of any conversations with children, their parents, staff, and external agencies – are likely to contain highly impactful, sensitive personal data about children.

Schools should take care when creating them and ensure that they are accessed on a need-to-know basis only by trained and appropriate staff.

Those with the responsibility for doing so must bear in mind that any records may need to be provided to the children involved and/or their parents in the future. For example, records could be requested as part of a parental complaint, or a legal claim, or under a subject access request (subject to limited exceptions – such as where it might not be in the child's best interests to disclose to a parent, or if there are overriding privacy interests of other children or families – but not staff). Increasingly individuals also seek to challenge records with 'right to be forgotten' or rectification requests.

All notes and related communications should always be concise, factual and objective, and focused on what is necessary for the safeguarding purpose. The language used should always be appropriate and professional.

That being said, professionals should not feel hampered by excessive caution. The core aim here is to capture any relevant information that could help protect children, and important details should never be missed because of unfounded data protection concerns.

Response and engagement of local authorities and other external agencies

The response of local authorities and other external agencies to alleged peer-on-peer abuse, and their engagement with it, can vary depending on the geographical area. Again, schools should consult their Local Safeguarding Partnership's Safeguarding Policy and Procedures and any relevant Practice Guidance issued by it. We have, for example, included reference in the template peer-on-peer abuse policy to the London Safeguarding Children Board's London Child Protection Procedures, and the section on Children Harming Others, which provides some very helpful guidance on the subject.

Schools should ask for confirmation, at the outset of designing their peer-on-peer abuse policy, of what their Local Safeguarding Partnership's thresholds and responses are to peer-on-peer abuse (including whether they are able to provide advice to schools on a no-names basis in borderline cases), and ensure that their policy is aligned with that.

Schools should know what is expected on their part in advance of a potential future concern/allegation of peer-on-peer abuse.

In accordance with the new multi-agency safeguarding model introduced by *Working Together to Safeguard*

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Children (July 2018), the template policy makes reference to 'Local Safeguarding Partnership' instead of 'LSCB', which is defined above. Schools should likewise amend their policy(ies) once their local authority has transitioned to the new model, and should use any term(s) appropriate to their local authority area.

As a matter of best practice, if an alleged incident of peer-on-peer abuse requires referral to and action by children's social care, and a strategy meeting is convened, then schools should hold every professional involved in the case accountable for their safeguarding response. This includes themselves, and the response to both the child who has allegedly experienced the abuse, and the child who is allegedly responsible for it, and the contexts to which the alleged abuse was associated. This is as opposed to potentially just going along, in a passive sense, with the direction of travel. In holding these professionals to account, schools can draw on the requirements set out in chapter two of *Working Together to Safeguard Children* (July 2018), which include a requirement that local authorities and other agencies, and all organisations referred to in that chapter, have in place arrangements that create a culture of safety, equality, and protection within the services that they provide[23].

Schools should actively engage with their local partners in relation to peer-on-peer abuse. For example, they should (i) request any updates on local trends relating to peer-on-peer abuse that might be impacting upon students; (ii) ask the local authority whether they have access to any resources associated with peer-on-peer abuse that can be used to strengthen their curriculum; and (iii) seek out the education representative who sits on local multi-agency operational or strategic groups where peer-on-peer abuse is discussed.

The relationships that schools build with their local partners are essential to enabling them to prevent, identify early, and appropriately handle cases of peer-on-peer abuse. They should help schools to:

• develop a good awareness and understanding of the different referral pathways that operate in their local area, as well as the preventative and support services which exist,

• ensure that their students are able to access the range of services and support they need quickly,

• support and help inform their local community's response to peer-on-peer abuse, and

• increase their awareness and understanding of any concerning trends and emerging risks in their local area to enable them to take preventative action to minimise the risk of these being experienced by their students.

A key point to raise here is that 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 schools themselves) to try to address the issue alone – it requires effective partnership working.

Ongoing proactive work/training
A school's response to concerns or allegations of peer-on-peer abuse should be part of its ongoing proactive work to embed best practice, and in taking a whole-school community Contextual Safeguarding approach to such abuse. As such, a school's response can become part of its wider prevention work. If introduced, a school should regard its peer-on-peer abuse policy as a constant work in progress, which it should regularly review to ensure that it continually identifies and addresses the level and nature of risk to which its students are, or may be, exposed.

Schools should use their students' views, experiences, and contributions (a) as a baseline against which to measure the impact of their peer-on-peer abuse policy – student surveys can help with this process[24]; and (b) to underpin and inform every stage of its design, implementation, and review.

Schools should ensure that they actively promote equality of gender and other characteristics, positive values and healthy relationships, and incorporate work on peer-on-peer abuse into their curriculum.

The AVA Prevention Platform has, for example, produced guidance for schools on how to develop students' understanding and skills to prevent violence against women and girls.

In terms of staff training, there are questions that schools should pose themselves – including, for example, do we think our staff have a good awareness and understanding of peer-on-peer abuse? Training staff should be straightforward once a peer-on-peer abuse policy is in place. We suggest that staff themselves develop relevant and engaging case studies. Training on peer-on-peer abuse should also be incorporated into wider safeguarding training, and schools should give careful consideration as to how to include key messages and principles applicable to their peer-on-peer abuse policy.

Ongoing parental engagement is key, and could be sought, for example, by providing sessions on peer-on-peer abuse, the internet and social media at parents' evenings, and other appropriate events, as well as providing clear information on, for example, the school's website, notice boards, and in letters to parents.

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Sometimes the people that you chill with want you to do certain things that you don't want to do, but you have to do it because you're part of that crew, you're part of it.

(participant, 13)[25]

I The School's responsibilities

Introduction
The governors, senior leadership team, and all staff (which term shall apply to all volunteer staff members) at [insert name of school] (the School) are committed to the prevention, early identification, and appropriate management of peer-on-peer abuse (as defined below) both within and beyond the School.

In particular, we:

- believe that in order to protect children, all schools should (a) be aware of the nature and level of risk to which their students are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context; and (b) take a whole-school community Contextual Safeguarding approach to preventing and responding to peer-on-peer abuse,

- regard the introduction of this policy as a preventative measure. We (a) do not feel it is acceptable merely to take a reactive approach to peer-on-peer abuse in response to alleged incidents of it; and (b) believe that in order to tackle peer-on-peer abuse proactively, it is necessary to focus on all four of the following areas: (i) systems and structures; (ii) prevention; (iii) identification; and (iv) response/intervention,[26]

- recognise national and increasing concern about this issue, and wish to implement this policy in order to mitigate harmful attitudes and peer-on-peer abuse in the school setting, and

- encourage parents to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any of their peers, they should inform the School so that it can ensure that appropriate and prompt action is taken in response.

This policy
This policy:

- is the School's overarching policy for any issue that could constitute peer-on-peer abuse. It relates to, and should be read alongside, the School's child protection policy and any other relevant policies including, but not limited to, bullying (including cyber-bullying), youth involved sexual imagery, online safety, IT use, data protection and retention of records, children missing in education, student behaviour and discipline, exclusions, and (where relevant) weapons,[27]

- sets out our strategy for improving prevention, and identifying and appropriately managing peer-on-peer abuse. It is the product of a comprehensive consultation – which has involved students, staff and parents, and a risk assessment. In producing this policy we have [insert list of steps taken],

- applies to all [governors, the senior leadership team, and staff].[28] It is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which students are or may be exposed. A number of staff and students are involved in each annual review which involves, and is informed by, an assessment of the impact and effectiveness of this policy over the previous year,

- recognises that abuse is abuse, and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up',

- is compliant with the statutory guidance on peer-on-peer abuse as set out in *Keeping Children Safe in Education* (September 2018),[29]

- does not use the term 'victim' and/or 'perpetrator'. This is because our School takes a safeguarding approach to all individuals involved in concerns or allegations about peer-on-peer abuse, including those who are alleged to have been abused, and those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter. 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,[30]

- uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18.[31] We have nonetheless chosen not to restrict our approach to peer-on-peer abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all students, regardless of age. Although the starting point is that the School's response to peer-on-peer abuse should be the same for all students, regardless of age, there may be some different considerations in relation to, for example, a child aged under 10, or a student aged 18 or over in terms of how local agencies and/or partners respond. This, for example, is likely to be different on the part of local authorities, given that their safeguarding duties are limited, in the case of children's social care – save for a number of specific exceptions[32] – to children and, in the case of adult social care services, to adults with care and support needs. Similarly, the School's response to incidents involving the exchange of youth involved sexual imagery will need to differ depending on the age of the students involved [see the School's youth involved sexual imagery policy for further information]. There is also likely to be a more significant criminal justice response in relation to any student responsible for abuse who is aged 18 or over,

- should, if relevant, according to the concern(s) or allegation(s) raised, be read in conjunction with the DfE's advice on *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges* (**DfE's Advice**) (May 2018),[33] and any other advice and guidance referred to within it, as appropriate, and

- should be read in conjunction with the Local Safeguarding Partnership's Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

II Understanding peer-on-peer abuse

What is peer-on-peer abuse?

"I beat them with words. This is most hurtful".
(male, 18)[34]

"Initially I thought it [him calling to ask where I was and wanting details of who I met and what I was doing] was ok…I even kind of liked it, you know…I thought it was a sign he really cared for me."
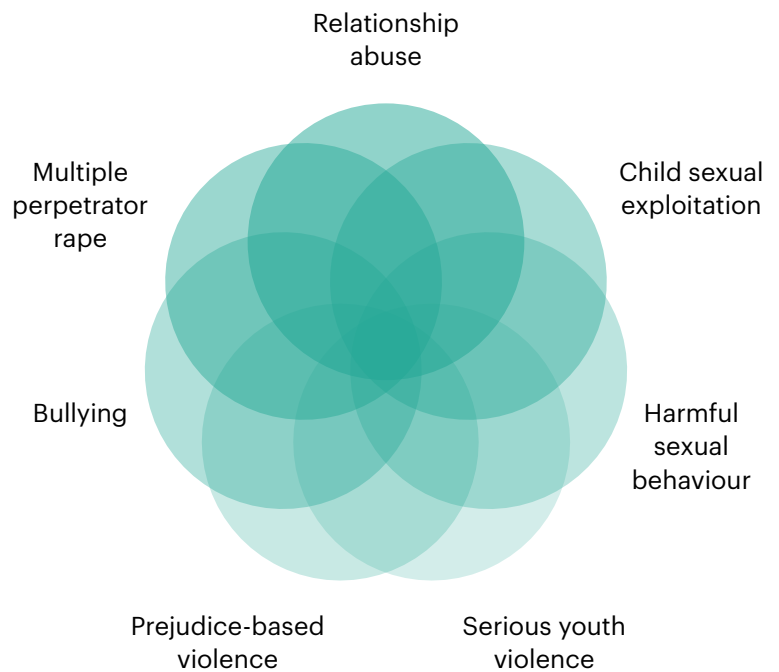(female, 15)[35]

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), friendships and wider peer associations.[36] Peer-on-peer abuse can take various forms, including (but not limited to): serious bullying (including cyber-bullying),[37] relationship abuse,[38] domestic violence and abuse,[39] child sexual exploitation,[40] youth and serious youth violence,[41] harmful sexual behaviour,[42] and/or prejudice-based violence including, but not limited to, gender-based violence.[43]

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.[44]

Holistic account of peer-on-peer abuse [45]

Relationship abuse

Multiple perpetrator rape

Child sexual exploitation

Bullying

Harmful sexual behaviour

Prejudice-based violence

Serious youth violence

Contextual circles of adolescent vulnerability [46]

Online environment

Neighbourhood

School

Peer group

Home
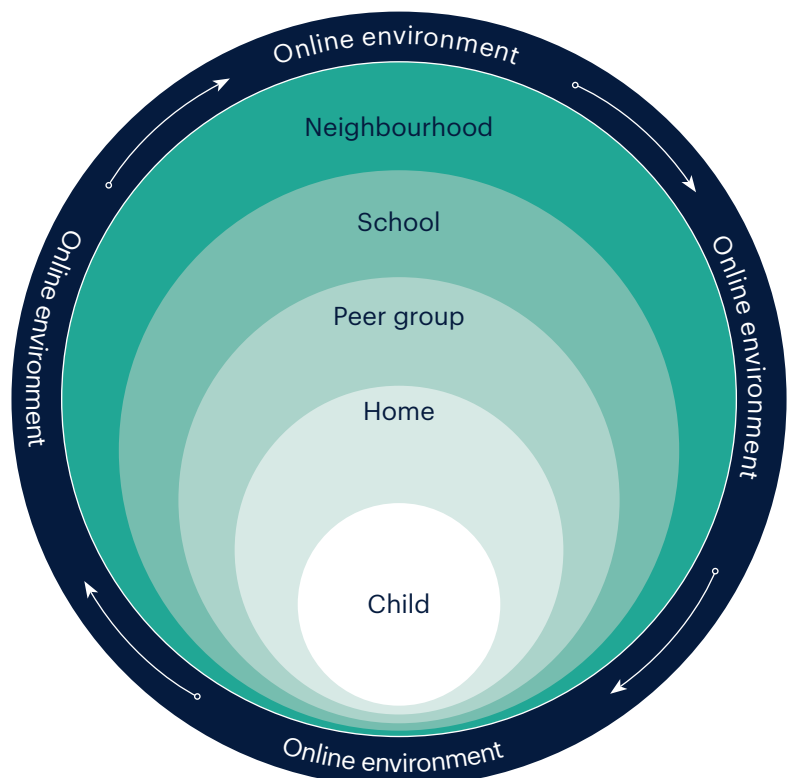
Child

Toolkit 2:
Template peer-on-peer abuse policy

What is Contextual Safeguarding?
This policy:

(a) encapsulates a Contextual Safeguarding approach, which 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.[47]

(b) adopts a whole-school community Contextual Safeguarding approach, which means:

- being aware of and seeking to understand the impact that these wider social contexts may be having on the School's students,

- 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 (see section entitled 'multi-agency working').

How prevalent is peer-on-peer abuse?
Research suggests that peer-on-peer abuse is one of the most common forms of abuse affecting children in the UK.[49] For example, [more than four in ten teenage schoolgirls aged between 13 and 17 in England have experienced sexual coercion.[50] Two thirds of contact sexual abuse experienced by children aged 17 or under was committed by someone who was also aged 17 or under].[51]

When does behaviour become problematic or abusive?[52]
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.

Sexual behaviours
Simon Hackett has proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a student's sexual behaviour and deciding how to respond to it.[53]

"

There I just think that you guys see me as a big target because you guys are always leaving me out and stuff, never paying attention to what I say, I just want you to see me for me and try to be my friend, I want to be your friend but you don't want to be mine and that makes me feel really kind of bad that you guys don't really want to know me. I see you guys laughing over there. I just really wanted to come up here and tell you guys that that's how I feel.

(anonymous) [48]

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.[54] 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.[55]

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, and

• involves a misuse of power.[56]

How can a child who is being abused by their peers be identified?
All staff should be alert to the well-being of students and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

Toolkit 2:
Template peer-on-peer abuse policy

Looking behind students' behaviour

> Case study
>
> A 15 year old girl starts to exhibit challenging behaviour in class which is out of character. She starts to have disagreements with the girls in her class and a number of "friendship issues" are reported to the teachers. The school moves the girl to another class, changes her timetable so that she does not have to interact with the girls in question, and provides her with a mentor.
>
> A few months later the girl throws a chair across the classroom. The girl is sent to the head teacher who calls the parents and temporarily excludes the girl from school. The pastoral lead discusses the incident with the head teacher, explaining that the behaviour is completely out of character for the girl, and that the school should explore the matter further. The pastoral lead sits down with the girl and asks her how she is. The girl discloses that her boyfriend is being physically violent and verbally abusive towards her.

The School's safeguarding [staff/team/committee] should regularly review behaviour incident logs which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

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 during adolescence, 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 also be particularly vulnerable to abuse by their peers.

"Can you help me? People at school have been calling me "gay" and "queer" and saying I'm "a girl". Since I've started high school it's been getting worse. They write things on a social network site about me – calling me more names. I feel sick and scared of going into school. How can they know I'm gay when I don't know myself yet? Please help."
(gender and age unknown)[57]

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.[58] 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,[59]

- children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND,[60] 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 a child's disability without further exploration,

  - the potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs,

  - communication barriers and difficulties, and

  - overcoming these barriers.

- 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.[61]

"

Well we had a really big meeting one time and the girls were split from the boys and then they spoke to us about reporting it and all that and they spoke to the boys about [how] they shouldn't do it…that is when it kind of slowed down and they didn't do it as much and then all of that talk just goes and they start doing it again. And we had another meeting…but the boys, I don't think they really care because no girls have said anything.

(girl, year 10)[62]

III A whole school approach

School environment

The School actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by:

- educating all governors, its senior leadership team, staff, students, and parents about this issue. This includes: 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 (i) Contextual Safeguarding, (ii) the identification and classification of specific behaviours, including digital behaviours, (iii) the importance of taking seriously all forms of peer-on-peer abuse (no matter how 'low level' they may appear) and ensuring that no form of peer-on-peer abuse is ever dismissed as horseplay or teasing, and (iv) 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. Training includes case studies which the staff design themselves,

- educating children about the nature and prevalence of peer-on-peer abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via PSHE and the wider curriculum. For example, by addressing gender inequality in a statistics class, or by reviewing literature in an English class which addresses bullying and its effect on mental health. Students are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the School's approach to such issues, including its zero-tolerance policy towards all forms of peer-on-peer abuse. Educating students about consent includes teaching them basic facts such as (i) a child under the age of 13 can never consent to any sexual activity; (ii) the age of consent is 16; and (iii) sexual intercourse without consent is rape, and

"I would just go home and my mum would say, 'Did you have a good day?' and I would just say 'Yes' knowing that it wasn't okay, but there was nothing I could do about it. But what would be better [is] if the teachers checked the cameras more often because it is mostly right in front of the cameras and this has happened from Year Seven and no one has discovered about it."

(boy, year 9)[63]

- engaging parents on these issues by:

  - talking about them with parents, 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,

  - involving parents in the review of School policies and lesson plans, and

  - encouraging parents to hold the School to account on this issue, in part as a result of visibility of this policy.

- [supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing in-school counselling and therapy to address underlying mental health needs. These interventions can be 'de-clinicised' and brokered through a positive relationship with the School and its staff. All staff are trained to meet low-level mental health difficulties within the students],[64]

- 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 School community,

- creating conditions in which our students can aspire to, and realise, safe and healthy relationships 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, and helping to create a safe School environment in which violence and abuse are never acceptable, [and in which certain behaviour such as the

carrying of weapons is not tolerated],[65]

  - in which 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 students with a sense of belonging, which could otherwise be sought in problematic contexts,

  - in which students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to,

  - which (i) proactively identifies positive qualities in students; (ii) nurtures these qualities; (iii) teaches and encourages students to think about positive hopes for the future; and (vi) supports students in developing small-scale goals that enable realistic ambitions, and

  - 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 (i) status; (ii) excitement; and (iii) a degree of risk,

- responding to cases of peer-on-peer abuse promptly and appropriately, and

- ensuring that all peer-on-peer abuse issues are fed back to the School's safeguarding [team/lead] 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 staff meeting at which all concerns about students (including peer-on-peer abuse issues) are discussed];[66] challenging the attitudes that underlie such abuse (both inside and outside the classroom).

"Yes, I got groomed by...I don't know if it was a girl or not...I told my mum, then my mum didn't listen and she went to the police and that's it. Then my mum was like, if she ever contacted me again...started having a go at me."

(girl, year 8)[67]

"

Sometimes if it's serious they are gonna tell somebody and that comforts you sometimes if you know that something is going to be done.

(girl, 14, Birmingham)[68]

Multi-agency working

The School actively engages with its Local Safeguarding Partnership in relation to peer-on-peer abuse, and works closely with, for example, children's social care, the police, [insert name(s) of local MASH (or equivalent), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures], and other schools.

The relationships the School has built with these partners are essential to ensuring that the School is able to prevent, identify early, and appropriately handle cases of peer-on-peer abuse. They help the School to: (a) develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist; (b) ensure that its students are able to access the range of services and support they need quickly; (c) support and help inform the School's local community's response to peer-on-peer abuse;

(d) increase the School's awareness and understanding of any concerning trends and emerging risks in its local area to enable it to take preventative action to minimise the risk of these being experienced by its students.

The School actively refers concerns and allegations of peer-on-peer abuse where necessary to children's social care, the police, [insert name(s) of local MASH (or equivalent), 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.

IV 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 the School); family; the School environment; their experience(s) of crime and victimisation in the

"

And all teachers chat in the staff room; they say they won't say anything and then the next thing you know the other teachers are looking at you and the whole school knows.

(girl, 15, Birmingham)[69]

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, and

– the potential complexity of peer-on-peer abuse and of children's experiences, and consider the interplay between power, choice and consent. 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.

What should you do if you suspect either 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)?

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 section [X] of the child protection policy) so that a course of action can be agreed.

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 (see Section [X] of the child protection policy).

If a child speaks to a member of staff about peer-on-peer abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. For further details please see the procedures set out in section [X] of the child protection policy.

How will the School respond to concerns or allegations of peer-on-peer abuse?
The DSL will discuss the concern(s) or allegation(s) with the member of staff who has reported it/them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

Where any concern(s) or allegation(s) indicate(s) that indecent images of a child or children may have been shared online, the DSL should consider what urgent action can be taken in addition to the actions and referral duties set out in this policy, and in the School's [youth involved sexual imagery policy], to seek specialist help in preventing the images spreading further and removing the images from the internet.

"

I told someone something once and it just made everything worse. If I thought for one minute that it would help me then I'd talk but I know that it won't so what's the point?

(girl, 15, Birmingham)[70]

The Internet Watch Foundation (IWF), for example, has a trained team that can evaluate and remove illegal images from the internet when the images are reported to them quickly. They will also share the image with the National Crime Agency's CEOP Command to facilitate an investigation. Any report to IWF will be made in consultation with the police.

DSLs should always use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour,[71] and (b) determine whether it is appropriate for the alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required.

In borderline cases the DSL may wish to consult with children's social care and/or [insert name(s) of local MASH (or equivalent), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures] 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(s) or allegation(s) with the agency and agree on a course of action, which may include:

A **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 B, C or D 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).*

B **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.[72]*

C **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.

D 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 [see the School's youth involved sexual imagery policy for further information]. All concerns or allegations will be assessed on a case by case basis, and in light of the wider context.

Safety plans
The School 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, or

- 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(s) and/or allegation(s) raised, and the needs and circumstances of the individual child/children in question – to determine whether (as explained above) it would be appropriate to contact children's social care, and to carry out a safety plan.[73]

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. Consultation is recommended 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 [insert relevant number - i.e. containing the further information from Appendix A to this toolkit]), 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, consideration should also be given by the DSL to 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.

Information sharing, data protection and record keeping
When responding to concern(s) or allegation(s) of peer-on-peer abuse, the School will:

- always consider carefully, in consultation with children's social care, the police and other relevant agencies (where they are involved), how to share information about the concern(s) or allegation(s) with the student(s) affected, their parents, staff, and other students and individuals,

- record the information that is necessary for the School and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) 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, and

- 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)[74] and the *HM Government advice on Information Sharing* (updated in July 2018).[75]

Disciplinary action
The School may wish to consider whether disciplinary action may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, it is critical that the School works in partnership with the police and/or children's social care.

Where a matter is not of interest to the police and/or children's social care, the School may still need to consider what is the most appropriate action to take to ensure positive behaviour management. Disciplinary action may sometimes be appropriate, including to:

(a) ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;

(b) demonstrate to the child/children and others that peer-on-peer abuse can never be tolerated; and

(c) ensure the safety and wellbeing of other children.

However, these considerations must be balanced against any police investigations, the child's/children's own potential unmet needs, and any action or intervention planned regarding safeguarding concerns. Before deciding on appropriate action the School will always consider its duty to safeguard all children in its care 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.

The School will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognizing that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. For example, action may still need to be taken by the School in relation to other students who have been involved with and/or affected by peer-on-peer abuse. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the School. Engaging in Fair Access Panel Processes to assist with decision-making associated to managed moves and exclusions can also be beneficial.[76] In the event of any managed move, consideration must be given to sharing information with the receiving school regarding the peer-on-peer abuse in order to allow best protection of children in the new school.

Disciplinary interventions alone are rarely able to solve issues of peer-on-peer abuse, and the School will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

On-going proactive work for a whole-school community Contextual Safeguarding approach

"I am not in school today as I am pretending to be ill. I have been bullied every day since I started school and have been having thoughts about ending my own life. I am called fat and ugly and have been told that nobody would care if I died. I feel really sad and want them to stop. Sometimes I think the only way it would all be over is if I killed myself."
(gender unknown, 15)[77]

The School's response to concerns or allegations of peer-on-peer abuse should be part of on-going proactive work by the School to embed best practice and in taking a whole-school community Contextual Safeguarding approach (defined above) to such abuse. As such the School's response can become part of its wider prevention work.

This response may involve the School working with the local authority to undertake, for example, a Contextual Safeguarding school assessment which would fit into a systems approach to Contextual Safeguarding.[78] The response could also include the School asking itself a series of questions about the context in which an incident of peer-on-peer abuse occurred in the School, the local community in which the School is based, and the wider physical and online environment – such as:

- What protective factors and influences exist within the School (such as positive peer influences, examples where peer-on-peer abuse has been challenged, etc.) and how can the School bolster these?

- How (if at all) did the School's physical environment or the students' routes to and from the School contribute to the abuse, and how can the School address this going forwards, for example by improving the School's safety, security and supervision, or by working with local safeguarding partners to mitigate the risks to students' safety whilst travelling to and from the School?

- How (if at all) did the online environment contribute to the abuse, and how can the School address this going forwards, for example by strengthening the way in which the School encourages positive and safe use of the internet by students?

- 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 trends highlight areas for development in the way in which the School works with children to raise their awareness of and/or

prevent peer-on-peer abuse, including by way of the School's 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 the School 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 in the School?

Answers to these questions can be developed into an action plan that is reviewed on a regular basis by the School's leadership and the DSL. The School will, where possible and appropriate, work with the local authority and wider partners to deliver on this plan, possibly as part of a wider Contextual Safeguarding school assessment led by or with input from the local authority.

[Insert Appendix to peer-on-peer abuse policy which sets out contact details for local agencies and a summary of referral pathways]

Toolkit 3: Appendices

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:
Template youth involved sexual imagery policy

"

He walks along with her 'whole life',
in his mobile phone, ready to share it with
anyone at any time.

(girl, 17)[91]

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.' Yet, recent NSPCC research has revealed that when children are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know.' Similarly, a recent ChildLine survey has revealed that many parents think of sexting as flirty or sexual text messages rather than images.

This policy only covers the involvement of children in sexual imagery.[92] This practice is often referred to as either "nudes" or "dick pics" by children. Creating, keeping and/or sharing sexual photos and videos of under-18s is illegal, and is classified as the making, possession or distribution of indecent images of a minor - under the Protection of Children Act 1978 (making and/or distribution) and the Criminal Justice Act 1988 (possession).[93] As such it causes the greatest complexity for schools (amongst other agencies) when responding. It also presents a range of risks which need careful management.

This policy uses the phrase 'youth involved sexual imagery' instead of 'sexting', or 'youth produced sexual imagery.'[94] Although the School recognises that the term "youth produced" is used in UKCCIS' advice *Sexting in schools and colleges: Responding to incidents and safeguarding young people,* it has chosen not to use this term which could be seen to place responsibility with the child who is taking and/or is the subject of the image, without recognising the potential

for coercion or threat in the production of that image.

The School also recognises that 'youth involved' and 'sexting' are not terms that children generally use, and it is important for staff in schools to understand the language that is used by children when discussing this issue with them or creating a policy.

What is youth involved sexual imagery?

'Youth involved sexual imagery' best describes the practice because:

- 'youth involved' includes children sharing images that they, or another child, have created of themselves, and

- 'imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy), and

- a judgement of whether something is 'decent' is both a value judgement and dependent on context. The term 'sexual' is clearer than 'indecent', although the DSL will nevertheless always need to use professional judgement when determining whether a photo is 'sexual'.

What types of incidents are covered by this policy?

Yes:
- A child creates and shares sexual imagery of themselves with a peer (also under the age of 18)

- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult

- A child is in possession of sexual imagery created by another child

No:
- The sharing of sexual imagery of children by adults constitutes child sexual abuse and schools should always inform the police

- Children sharing adult pornography or exchanging sexual texts which do not contain imagery[95]

- Sexual imagery downloaded from the internet by a child[96]

- Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult[97]

Disclosure

Disclosure about youth involved sexual imagery can happen in a variety of ways. The child affected may inform a class teacher, the DSL in School, or any member of the School staff. They may report through an existing reporting structure, or a friend or parent may inform someone in School or a colleague or inform the police directly. There is also a possibility that a member of staff may be made aware of an image in circulation by other students not involved in either the production or initial transfer, but who have become exposed to the imagery as a result of wider distribution.

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving youth involved sexual imagery. Staff should also be aware of the legalities around youth involved sexual imagery so they can best inform students in their care – messages such as "it's illegal" are not considered to be helpful (for reasons explained below). This should be covered within staff training and within the School's child protection policy.

Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in School is a last resort and they may have already tried to resolve the issue themselves.[98]

Handling incidents

All incidents of youth involved sexual imagery should be responded to in line with the School's child protection and peer-on-peer abuse policy. When an incident involving youth involved sexual imagery comes to a member of staff's attention:

- the incident should be referred to the DSL as soon as possible,

- the DSL should hold an initial review meeting with appropriate School staff. The DSL will follow the procedures and guidance set out in *Sexting in schools and colleges: responding to incidents and safeguarding young people*,[99]

- there should be subsequent interviews with the children involved,

- parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm,

- *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,*

- any report to the police should be considered against the severity of the concerns and/or allegations, the impact on any child who has allegedly experienced the abuse, and broader context of the production and distribution of the image (for example: was production consensual or coerced? Was sharing consensual? Was production volunteered or requested? What are the ages of the children involved?), and

- depending on the facts of the particular concern or allegation, a report to the police does not necessarily mean that the child will be criminalised. Since January 2016, the police are able to record an "Outcome 21" against a reported crime, meaning it is not in the public interest to pursue a charge. The majority of youth involved sexual imagery would fall into this category. However, in the event of coercion, exploitation, further harm or aggravated behaviours, it is valid for police involvement to result in criminal charge. The School should communicate with their police liaison to determine awareness of Outcome 21 recording and its appropriateness in any given incident.

Education

Teaching about safeguarding issues in the classroom can prevent harm by providing children with skills, attributes and knowledge to help them navigate risks. The School will provide children with opportunities to learn about the issue of youth involved sexual imagery, as part of its commitment to ensure that they are taught about safeguarding, including online, through teaching and learning opportunities – as also referred

to in the School's [online safety policy]. Children will be encouraged to share concerns with staff and will be told, for example, that there are ways of removing images from the internet if they are reported quickly. For further details, please see the School's peer-on-peer abuse policy.

Education should be inclusive, age appropriate, and provide children with the opportunity to discuss and ask questions. In general, an assembly where they are told youth involved sexual imagery is illegal, and they should not do it, is not sufficient. If education does consider the legal issues associated with youth involved sexual imagery, it should consider the nature of the legislation and likely police responses, rather than simple declarations of illegality.

When considering the sharing of youth involved sexual images among peers, a lot of online safety messaging centres on telling children that they should not produce images of themselves and send them to people because it is illegal, or in doing so they are placing themselves at risk. We find this approach problematic because: i) these messages are likely to result in a child being abused, coerced, or exploited as a result of such behaviour feeling that they cannot ask for help or disclose abuse because they did something wrong and, therefore, they deserve what is happening to them; and ii) the nature of this messaging can contribute to victim blaming. The more problematic behaviours around the sharing of youth involved sexual images does not lie with the initial generation of the image but the distribution, or threat to distribute, by the recipient to third parties. Therefore, the School tackles the subject by focusing on the non-consensual sharing and the potential punishment for those individuals, rather than potentially suggesting that for anyone who creates and sends an image deserves the abuse they receive.

Appendix C:
Example weapons policy

(Please note that this is from a community special maintained school. It will not be suitable for all schools and should not be adapted wholesale (for example pupils at boarding schools will legitimately have razors and/or scissors on site). A weapons policy should always be tailored to a school's specific safeguarding context).

Under no circumstances should a weapon be brought into the School. If a student is discovered to have brought a weapon into the School the police will be informed, the student will be placed on a fixed term exclusion, and a disciplinary hearing will be carried out.

At this hearing the following issues will be discussed:

• how the weapon was found, discovered or reported,

• the nature of the weapon,

• the location and storage of the weapon on the School's site,

• knowledge of third parties as to the weapon being in the School,

• what the perceived purpose was of having the weapon in the School, and

• preceding behaviour and attitude of the student whilst attending anonymous.

Following this hearing:

• either permanent exclusion will be recommended to the Governors by the Principal or Head of the School - *it is usual for permanent exclusion to be recommended* if the student is in Key Stages 3, 4 or 5 unless it is judged that there are very exceptional circumstances to be considered. The contextual information will be evaluated in a differentiated way for students in Key Stages 1 and 2 and it will not always be the case that permanent exclusion will be recommended for this age group although this still remains an option,

• a further fixed term exclusion will be issued, where the grounds for doing so are met, or

• an agreement will be reached whereby the student will spend an agreed period of time working with the community learning team on specific targets that, when met, will facilitate reintegration back onto the School's site.

Weapons include guns, pellet guns, BB guns, air guns, replica guns, knives, num-chukkas, death stars and other martial arts objects; screwdrivers, hammers, chisels, bradles and any tool that could be used offensively; razors, razor blades, aerosols, chains, scissors, etc. This list is not exhaustive but it should be noted that weapons also describe 'home made' implements manufactured to injure, threaten or intimidate.

If an item such as a pair of scissors is picked up in the School and used or threatened to be used as a weapon then any sanction referred to in the behaviour management policy may be recommended to the governing body.

If a student hands in a weapon to a member of staff before they have been challenged about it being in their possession, the outcome of this incident will be negotiated with the Chair of the governing body and the Principal or Head of the School.

Members of staff can use reasonable force to protect themselves against a weapon, or when retrieving a weapon from an individual or group. In the circumstances of a student being unwilling to hand over a weapon to a member of staff the police will be called using 999. In this instance staff may use whatever proportional physical intervention is necessary to retrieve the weapon and / or to protect the safety of all.

Appendix D:
Case studies

Case study one

Sarah Jones (student, aged 18) is a student at Hilltop School (an independent boarding school for 13 to 18 year olds).

Sarah disclosed to the DSL six months ago that she thought she had been raped by Benjamin Green (student, aged 17) at a party in London during the school holidays. Sarah had not wanted the DSL to tell her parents (she was worried that they would blame her for the incident), or the police (she was worried that the police would want to investigate which would mean that everyone would find out about the incident). The DSL and the Principal respected her wishes at the time, given her age and the fact that the incident had taken place outside of school. They had discussed the allegation with Benjamin and asked him not to contact Sarah on social media. Both students are boarders.

Since then, Sarah has displayed increasingly concerning behaviour. A few weeks ago she left the boarding house without permission at the weekend. She returned late on Saturday evening very drunk. She shouted and swore at her housemistress. She was suspended from school for one week.

Whilst on suspension Sarah made a formal report to the police that Benjamin Green had raped her six months previously. The local police contacted the school later that day, and informed the DSL of Sarah's report and that the police were going to interview Benjamin and investigate the allegation. They also said that Sarah had told them that she was very worried about seeing Benjamin in school, and that she did not think that she could come back to school if he was there.

The DSL informed Benjamin of Sarah's formal report straight away and his mother picked him up from school later that day. They were planning to attend the police station voluntarily.

The DSL alerted the School's Principal to the developments, explaining that he "did not know what to make of the allegation" because he was concerned for Benjamin who was "a star student who had never caused any trouble in the past." The DSL also explained that he was worried about the stigma that would be associated with Benjamin as a result of the police investigation. The DSL was also worried about Sarah, particularly given the comments she had made to the DSL last month

about suicide. The DSL sought the Principal's guidance on next steps and whether the School needed to suspend Benjamin.

Questions

1. **Where does Benjamin's alleged behaviour sit on Simon Hackett's continuum?[100]**
   On the basis of the current facts, and subject to further information which may emerge from any investigation, it would be violent behaviour.

2. **What are your concerns?**
   - Sarah's welfare – in addition to the alleged rape, she has made comments to the DSL about suicide, and there is reference to her presenting with increasingly concerning behaviour, as well as the more recent incident which resulted in her suspension? The impact on Sarah of a police investigation, and the impact on her education.

   - Benjamin's welfare – what are the possible contributing factors to his alleged behaviour? Are there any wider safeguarding concerns? Has he experienced abuse and/or is he at risk of harm? The impact on Benjamin of a police investigation, and the impact on his education.

   - Has Benjamin possibly harmed and/or does he pose a risk of harm to other students at the school? Have any other students been involved in or otherwise been affected by Sarah's allegation? The impact on any students who may be asked to participate in a police investigation, and the impact on their education.

   - The wider school community, including students, staff and parents – including the extent to which they may be affected by the allegation if it becomes widely known.

   - The school's response so far – including the fact that the school did not report Sarah's disclosure to the relevant external agencies when she first made it; the DSL informed Benjamin of Sarah's allegation when she initially raised it, without consulting the relevant external agencies; there is no reference to Sarah's parents having been informed about Sarah's allegation (assuming there are no legitimate obstacles presented to parental knowledge); the school appears to have suspended Sarah in response

to her behaviour – in the absence of any reference to appropriate pastoral care and support being in place for her; there is no mention of the existence of any safety plan for Sarah or Benjamin, or any other students (if necessary), or the wider school community; the DSL's attitude towards Benjamin and Sarah's allegation; the DSL informed Benjamin of Sarah's formal report to the police, without consulting with the relevant external agencies.

3. What are your next steps?
Next steps include (but are not limited to):

- A referral to children's social care in respect of both Sarah and Benjamin.

- Although Sarah is 18, the school should nonetheless contact children's social care to ascertain whether they are able to engage and to provide some support for Sarah, despite her age, to advise the school on how it can best safeguard and support Sarah, and/or to signpost it to specialist services.

- Children's social care may want to carry out an assessment of Benjamin, including of any risk of harm that he may pose to other children – at or outside the school, and to use the results of that assessment to inform the support that they provide to him.

- Complete a safety plan for Sarah and Benjamin, and each student who may be affected by the alleged abuse (if appropriate). This should be done in consultation with the police, children's social care, the school's local authority safeguarding adviser in education (or equivalent), the students' parents (assuming there are no obstacles presented to parental engagement), and any other relevant professionals (for example, a child psychologist), as appropriate.

  The safety plan should set out, for example:

  – How best to safeguard and support Sarah and Benjamin – are there any specialist services that the school can refer them to?

  – How best to inform and engage with Sarah's parents, who may not be aware of Sarah's allegation or formal report. The school should speak to Sarah about this, and encourage her to inform her parents and/or offer to inform them directly if she would prefer.

  – What the likely impact will be on both Sarah and Benjamin of the police investigation and how can this be minimised; what the impact will be

on Sarah of Benjamin's presence in school (can a social worker or psychologist provide a view on this?); whether the school can and should segregate Benjamin and Sarah; whether children's social care and/or the police have any concerns about Benjamin being in school; or whether consideration will need to be given to alternative plans for Benjamin, and what the impact of this would be on Benjamin's welfare and education.

  – Who should be told about the allegation internally to ensure that the children are safeguarded appropriately.

- Consider the school's wider reporting obligations, for example, to the Charity Commission, and insurers.

- Consider how to keep the allegation confidential where possible and appropriate, and what to communicate to students, staff and parents if the allegation becomes public.

- Consider what aspects of the school's systems need to be strengthened as a result of the alleged incident. For example, do staff need training on peer-on-peer abuse, and their and the school's responsibilities in reporting and responding to alleged incidents, including those that take place outside of school? Does the school teach students effectively and facilitate discussion about sex and consent?

Case study two
Karla Olivares (aged 5) is a student at Greengrove Primary School.

Karla told her mother one morning that she did not want to wear a skirt to school. When her mother asked why Karla said that she didn't want "those boys" to hurt her again. Karla then disclosed to her mother that two boys in her class had taken her behind a tree in the playground the day before, they had lifted her skirt and touched her inappropriately in a way that hurt her. Karla was too upset to say who the boys were, and her mother had taken her to the Doctor for a full examination.

Karla's father then contacted the Headteacher to inform her of the disclosure. He said that he thought that the "predators" might be Sam and Yen, two boys in Karla's class who he said had been "causing trouble for some time now". Karla's father was very upset and angry and said he and his wife were outraged that this could have happened at school. He referred back to previous concerns that he had raised with the school about its security. He also demanded an immediate investigation which he said should include interviews with all staff and

children "until we can find out who the predators are".
Finally, he said that "once the predators are known they
must of course be expelled immediately".

Questions

1. Where does the boys' alleged behaviour sit on Simon Hackett's continuum?[101]
On the basis of the current facts, and subject to further information which may emerge from any investigation regarding, for example, possible coercion, intimidation, or force, it would be problematic sexual behaviour.

2. What are your concerns?
- Karla's welfare – she may have suffered physical harm as a result of the boys' alleged behaviour, and may be distressed and feel unsafe in school. The impact on her education, and the impact on Karla of any investigation.

- The boys' welfare – what are the possible contributing factors to their alleged behaviour? Are there any wider safeguarding concerns? Have they experienced abuse and/or are they at risk of harm? The impact on their education, and the impact on the boys of any investigation.

- Have either or both of the boys possibly harmed and/or do they pose a risk of harm to other children – at or outside of the school? What will the impact of an investigation be on the other children at the school?

- The school's security and supervision procedures – what are the previous concerns raised by the father? Have they been appropriately addressed by the school, if/as necessary? Does the school need to improve its security and supervision procedures in light of this alleged incident?

- The father suspects that Sam and Yen may be responsible for allegedly harming Karla, without, on the facts, having any actual evidence. He is also labelling the boys as 'predators,' and demanding that they be expelled immediately.

3. What are your next steps?
Next steps include (but are not limited to):

- The School should contact children's social care in respect of Karla, to determine which referrals to external agencies should be made. For example, should the school make any referrals to children's social care and/or the police? As Karla's allegation relates to children who are under the age of criminal responsibility (10), the police will take a welfare approach to the alleged incident rather than a criminal one.

- Complete a safety plan for Karla, in consultation with children's social care, and the police (if involved), the school's local authority safeguarding adviser in education (or equivalent), her parents, and any other relevant professionals (for example, Karla's doctor), as appropriate.

  The safety plan should set out, for example:

  - How best to safeguard and support Karla. Are there any specialist services that the school can refer her to?

  - Karla's medical needs. Ask her parents whether they would like the school to be made aware of any issues that arise from the doctor's examination so that the school can ensure that Karla is appropriately supported.

  - Karla's safety and welfare in school – how can the school help Karla to feel safe and happy in school? For example, by supervising her class closely, and/ or by drawing on any trusting relationship(s) that she has with any teachers.

  - How to work with Karla's parents to help them to mitigate any psychological harm resulting from the alleged behaviour, and/or her parent(s) or other(s) reactions to it.

  - Who should be told about the allegation internally to ensure that the children are safeguarded appropriately?

- Consider who is best placed to investigate the alleged incident, and how it can be carried out in a way which minimises the impact on the children and ensures that they are supported throughout – is it children's social care?

- Consider, in light of the investigation's findings, whether any other referrals should be made to children's social care and/or the police, and whether a safety plan needs to be carried out for any other children.

- Consider the school's wider reporting obligations, for example, to the Charity Commission, and insurers.

- Consider how to keep the allegation confidential where possible and appropriate, and what to communicate to students (age appropriately), parents and staff if the allegation becomes public.

- Consider what aspects of the school's systems need

to be strengthened as a result of the alleged incident. For example, should the school's supervision arrangements in the playground and any other locations be improved? Does the school educate the children effectively and in an age appropriate manner about how to stay safe from sexual abuse? Does the school communicate with parents effectively about children's safe and healthy sexual development, and problematic and harmful sexual behaviour in young children?

Case study three

Paul (student, aged 15) is a student at King George secondary school.

Paul has become increasingly unhappy at school over the past two years.

He recently told his father that he was being badly bullied by a number of boys and girls in his class, and that this had been going on for over two years. He explained that they had posted nasty comments about him on Instagram, that they would steal his lunch, chase him, and make him do things during Mr Reed's class which he found humiliating – like repeat sexually explicit comments from social media. They also forced him to drink unpleasant things which made him physically sick. Mark Stone, another student aged 14, was also picked on and made to do this.

Paul's mother informed his form tutor Mr Reed, who said that he would investigate the matter. She met with Mr Reed last week. He told Paul's mother that he had had a quick word with some of the students in question, who were clearly just "having a bit of fun," and that she should not be overly worried about it. He said that he had spoken to Mark's mother, Mary, who had said that Mark told her he was "honoured to have been chosen" to perform the same tasks for the students in question. He said that he was always present during Mr Reed's class, and that he thought they were a very good and fun way to bring the class together. When Paul's mother asked about the racist and sexist language that Paul had told her was routinely used in the class, Mr Reed said that he had overheard some jokes, although generally he thought they were "in the right spirit".

Questions

1. **Where does the alleged behaviour sit on Simon Hackett's continuum?[102]**
   On the basis of the current facts, and subject to further information which may emerge from any investigation, it would be abusive – on the basis that it appears to involve victimisation, intent, coercion and force.

2. **What are your concerns?**
   * Paul's and Mark's welfare – the alleged behaviour appears to have been taking place over a number of years (at least two years in Paul's case), and the psychological impact of it may be significant; the impact on their education; the impact of any investigation on them.

   * The welfare of the students who are the subject of Paul's allegations – what are the possible contributing factors to their alleged behaviour? Are there any wider safeguarding concerns? Have they experienced abuse and/or are they at risk of harm? The impact on their education, and the impact of any investigation on them.

   * Have those students possibly harmed and/or do they pose a risk of harm to other children - at or outside the school? Have any other students been involved in or otherwise been affected by their alleged behaviour? The impact on their education, and the impact of any investigation on them.

   * Mr Reed's response – he does not appear to realise the seriousness of the alleged behaviour, or the harm that it seems to have caused Paul (and possibly Mark and others). He has not investigated Paul's mother's complaint, and appears to be normalising the alleged behaviour.

   * Mary's response – Mark's mother likewise does not seem to realise the seriousness of the alleged behaviour, or the harm that it may be causing to her son, Paul and possibly others.

   * Culture in the school – Mary's and Mr Reed's attitude may be the result of and/or have contributed to the normalisation of the alleged behaviour amongst the students in question, and possibly other students, staff and parents.

3. What are your next steps?

- A referral to children's social care in respect of Paul.

- Devise a safety plan for Paul and Mark, each of the students who are the subject of Paul's allegation, and each student who may be affected by the alleged abuse (if appropriate). This should be done in consultation with children's social care, the school's local authority's safeguarding adviser in education (or equivalent), the children's parents, and any other relevant professionals, as appropriate.

  The safety plans should set out, for example:

  – How to best safeguard and support Paul and Mark – are there any specialist services that the school can refer them to?

  – Who should investigate the incident – children's social care, the school, or should the school commission an external investigation?

  – In light of the investigation's findings, whether any other referrals should be made to children's social care and/or the police, and safety plans devised for any other children.

  – Who should be told about the allegation internally to ensure that the children are safeguarded appropriately?

  – Consider whether any disciplinary action should be taken against Mr Reed, and/or any of the students – in considering the latter, the children's age, the harm to which they may have been exposed, and the extent to which their behaviour had been encouraged and/or normalised by other children or Mr Reed, should all be taken into account.

- Consider the school's wider reporting obligations, for example, to the Charity Commission, and insurers.

- Consider how to keep the allegation confidential where possible and appropriate, and what to communicate to students (age appropriately), parents and staff if the allegation becomes public.

- Consider what aspects of the school's systems need to be strengthened as a result of the alleged incidents. For example, how can the school address the harmful norms that seem to have become embedded within this particular class? Is a whole-school approach required? How can the school strengthen the way that it prevents, identifies and responds to sexual harassment, bullying, racism, and sexism within school?

Appendix E:
Examples of further resources

Peer-on-peer abuse statistics

Barnardo's

https://www.barnardos.org.uk/news/Police_figures_
reveal_rise_of_almost_80_in_reports_of_child-on-child_
sex_offences/latest-news.htm?ref=121581

Police figures reveal rise of almost 80% in reports of
child-on-child sex offences

**Marie Collins Foundation online peer-on-peer
abuse survey, June 2018**

https://www.mariecollinsfoundation.org.uk/assets/
news_entry_featured_image/MCF-Peer-on-peer-Abuse-
Research-Report-sunday-final-version.pdf

A national survey of Headteachers and Safeguarding
Leads in England and Scotland

NSPCC

https://www.nspcc.org.uk/globalassets/documents/
research-reports/partner-exploitation-violence-
teenage-intimate-relationships-report.pdf

This 2009 report explores partner exploitation and
violence in teenage intimate relationships

https://learning.nspcc.org.uk/research-resources/2017/
children-young-people-technology-assisted-harmful-
sexual-behaviour

This 2017 study explores the behaviours, background
and characteristics of children and young people
who engage in technology-assisted harmful sexual
behaviour

The Centre for Social Justice

http://www.centreforsocialjustice.org.uk/core/wp-
content/uploads/2016/11/Bullying-RT-Report-1.pdf

This 2016 roundtable report looks at how the education
sector can best support children who self-exclude due
to bullying. It sets out a number of important statistics

Parliament publication

https://publications.parliament.uk/pa/cm201617/
cmselect/cmwomeq/91/9105.htm

This 2016 publication examines the scale and impact of
sexual harassment and sexual violence in schools

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?

https://learning.nspcc.org.uk/research-resources/2018/
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

**NSPCC's, Research in Practice's and Professor Simon
Hackett's harmful sexual behaviour framework, 2nd
edition**

https://learning.nspcc.org.uk/research-resources/2019/
harmful-sexual-behaviour-framework/

This contains the continuum model proposed by
Professor Simon Hackett (2010) and helps local areas
develop and improve multi-agency responses to
children displaying harmful sexual behaviour

**NSPCC guidance on the stages of normal sexual
behaviour**

https://www.nspcc.org.uk/preventing-abuse/keeping-
children-safe/healthy-sexual-behaviour-children-young-
people/

**NSPCC guidance on protecting children from harmful
sexual behaviour**

https://learning.nspcc.org.uk/child-abuse-and-neglect/
harmful-sexual-behaviour/

**The NSPCC's online training courses on managing
sexualised behaviour in primary and secondary
schools**

https://learning.nspcc.org.uk/training/schools/
managing-sexualised-behaviour-in-schools-online-
courses/

Brook Sexual Behaviours Traffic Light Tool

https://www.brook.org.uk/our-work/the-sexual-
behaviours-traffic-light-tool

Appendix E:
Examples of further resources

The University of Bedfordshire Contextual Safeguarding Team, supported by Ofsted and the Care Quality Commission

https://contextualsafeguarding.org.uk/publications/ beyond-referrals-levers-for-addressing-harmful-sexual- behaviour-in-schools

This toolkit contains a range of resources for schools to assess their own response to harmful sexual behaviour

The University of Bedfordshire Contextual Safeguarding Team with Hackney Children and Families Services

https://www.contextualsafeguarding.org.uk/ publications/school-assessment-toolkit

This Contextual School Assessment toolkit supports practitioners to consider how to assess and develop responses to peer-on-peer abuse in secondary schools

The University of Bedfordshire Contextual Safeguarding Team has a Fair Access Panel Referral form to capture peer-on-peer abuse as a reason for a move or exclusion, and accompanying practitioner video

Only members of the Contextual Safeguarding Network may access the available resources. Details of how to apply to join the Network can be found on the above Contextual Safeguarding links

Educating staff, children and parents

Disrespect Nobody Home Office Campaign

https://www.disrespectnobody.co.uk/

Serious Youth Violence – Home Office 'This is abuse campaign for schools'

https://assets.publishing.service.gov.uk/government/ uploads/system/uploads/attachment_data/ file/410010/2015-03-08_This_is_Abuse_campaign_ summary_report__2_.pdf

http://www.childnet.com/ufiles/Cyberbullying- guidance2.pdf

Fritz, D. and Firmin, C., 2016 Learning Project 1: Evidencing peer-on-peer abuse in educational settings

https://contextualsafeguarding.org.uk/assets/ documents/Learning-Project-1-Briefing.pdf

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

http://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

http://www.childnet.com/ufiles/Cyberbullying- guidance2.pdf

Provides cyber bullying guidance

https://www.childnet.com/resources/pshe-toolkit

Provides guidance for children and their parents on the nuanced features of live streaming and the specific risks children can face

https://www.thinkuknow.co.uk/professionals/ resources/live-streaming/

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

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)

- PANTS (The Underwear Rule) resources for parents, and staff
  https://www.nspcc.org.uk/preventing-abuse/ keeping-children-safe/underwear-rule/

- Speak Out Stay Safe programme of assemblies and workshops which teaches children to speak out if they are worried
  https://www.nspcc.org.uk/services-and-resources/ working-with-schools/speak-out-stay-safe-service/

- Share aware campaign
  https://www.nspcc.org.uk/preventing-abuse/ keeping-children-safe/share-aware/

Appendix E:
Examples of further resources

Support and interventions

The National Clinical Assessment and Treatment Service (NCATS)

https://www.nspcc.org.uk/services-and-resources/childrens-services/ncats/

Offers assessment and treatment services to children and young people with harmful sexual behaviour, and consultation and training to professionals managing complex or high-risk harmful sexual behaviour cases

The Lucy Faithful Foundation (LFF)

https://www.stopitnow.org.uk/

Stop It Now! UK and Ireland is a child abuse prevention campaign and helpline which is run by the LFF – supporting adults to play their part in prevention through providing sound information, educating members of the public, training those who work with children and families, and running a confidential and anonymous helpline (available for anyone with concerns about child sexual abuse)

https://www.lucyfaithfull.org.uk/files/Inform_Young_People_Leaflet_2017.pdf

LFF leaflet for professionals, parents and carers who have concerns about a young person's online sexual behaviour

https://www.parentsprotect.co.uk/files/LFF_eResource_Pack_for_Parents_JUNE17.pdf

LFF guidance *What's the problem? A guide for parents of children and young people who have got in trouble online*

https://www.parentsprotect.co.uk/

Parents Protect provides services to agencies working with children and their families – for those with problematic sexual behaviour on the internet and in the 'real world'. Parents Protect is a project of the LFF, and provides an online resource for parents, and others who want to protect children from harm

Red Balloon Learning Centres

http://www.redballoonlearner.org/

Red Balloon supports children who self-exclude from school and are missing education because of bullying or other trauma. It provides an academic and therapeutic programme to enable its students to get back on track and reconnect with society

Leap Confronting Conflict

http://www.leapconfrontingconflict.org.uk/

Leap is an award-winning national youth charity that provides inspirational conflict management programmes and support to children (and young adults) and the professionals working with them

Barnardo's

https://www.barnardos.org.uk/what_we_do/our_work/sexual_exploitation/cse-professionals/cse-can-you-see-it.htm

Government Guidance

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

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

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

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

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

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

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

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf

Appendix E:
Examples of further resources

Department for Education, Keeping Children Safe in Education: Statutory guidance for schools and colleges, September 2018

https://assets.publishing.service.gov.uk/government/
uploads/system/uploads/attachment_data/file/550511/
Keeping_children_safe_in_education.pdf

General

Contextual Safeguarding Practitioners' Network

www.contextualsafeguarding.org.uk

Appendix F: References

Toolkit 1

1   Firmin, C., *Abuse Between Young People: A Contextual Account.* 2017. Oxon: Routledge

2   Further details are contained in the template policy

3   Phippen, A., Bond, E., Tyrelll, K., Online Peer on Peer Abuse: *A national survey of Headteachers and Safeguarding Leads in England and Scotland,* 2018: https://www.mariecollinsfoundation.org.uk/assets/news_entry_featured_image/MCF-Peer-on-peer-Abuse-Research-Report-sunday-final-version.pdf

4   All references to 'parents' throughout this guidance, and the attached template policy and appendices, should be interpreted as referring to parents and carers

5   Please see the NSPCC's, Research in Practice's and Professor Simon Hackett's harmful sexual behaviour framework, 2019, pages 28 and 31: https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework/

6   The NSPCC's online course on *Managing sexualised behaviour in schools:* https://learning.nspcc.org.uk/training/schools/managing-sexualised-behaviour-in-schools-online-courses/

7   The United Nations Convention on the Rights of the Child, 1989 (ratified by the UK in 1991): https://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx

8   Department for Education, *Keeping Children Safe in Education: Statutory guidance for schools and colleges*, September 2018: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf

9   Please see Appendix C

10   For the purposes of this toolkit, 'local safeguarding partnership' refers to (i) the three local safeguarding partners set out in *Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children,* July 2018; and (ii) any other agencies whose involvement either those partners or schools consider appropriate to safeguard and promote the welfare of children

11   UK Safer Internet Centre, Guide for education settings and filtering providers about establishing 'appropriate levels' of filtering and monitoring: https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring

12   'Protected Characteristics' that are protected under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation

13   Further details are contained in the template policy

14   For more information on using and reviewing behaviour logs please visit: https://www.contextualsafeguarding.org.uk/assets/documents/Behaviour-logs.docx

15   The age limit of 13 is often set in compliance with the Children's Online Privacy Protection Act - an American law which protects the privacy of children under the age of 13, and states that they cannot be exposed to advertising without parental consent. Following the introduction of the EU's General Data Protection Regulation, some social media sites and apps have raised their age limit to 16. This 'digital age of consent' sets the age at which a child can consent to their data being collected and profiled. If the child lies about their age, the provider has no liability for irresponsible data collection and processing

16   For reporting advice please see Childnet, *How to make a report:*
      https://www.childnet.com/resources/how-to-make-a-report

17   See, for example, Childline: https://www.childline.org.uk/

18   For examples of digital awareness resources, please see Appendix E

19   Our guidance on safety plans (see Appendix A) is informed by the NSPCC's safety plan template, provided
      as a resource within the NSPCC's online course on *Managing sexualised behaviour in schools:* https://
      learning.nspcc.org.uk/training/schools/managing-sexualised-behaviour-in-schools-online-courses/

20   HM Government, *Information Sharing: Advice for practitioners providing safeguarding services to children,
      young people, parents and carers,* July 2018:
      https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/
      file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

21   Department for Education, *Working Together to Safeguard Children: A guide to inter-agency working to
      safeguard and promote the welfare of children,* July 2018:
      https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/
      file/729914/Working_Together_to_Safeguard_Children-2018.pdf

22   For examples of how some schools are already capturing information on peer-on-peer abuse please see:
      Fritz, D. and Firmin, C., *Learning Project 1: Evidencing peer-on-peer abuse in educational settings,* 2016:
      https://contextualsafeguarding.org.uk/assets/documents/Learning-Project-1-Briefing.pdf

23   Please see *Working Together to Safeguard Children: A guide to inter-agency working to safeguard and
      promote the welfare of children*, July 2018, page 57 (chapter two, paragraph three)

24   For an example of a student survey see: https://contextualsafeguarding.org.uk/publications/
      student-survey

Toolkit 2

25   Firmin, C., *This is it. This is my life...Female Voice in Violence, Final Report*. 2011. London: ROTA

26   Contextual Safeguarding Network, *Beyond referrals: levers for addressing harmful sexual behaviour in
      schools,* 2018:
      https://contextualsafeguarding.org.uk/publications/beyond-referrals-levers-for-addressing-harmful-
      sexual-behaviour-in-schools. These resources are only accessible to members of the Conventional
      Safeguarding Network, which is free to join

27   For schools wishing to implement a standalone weapons policy, they may wish to draw on the example
      provided in Appendix C

28   The definition should be as wide as possible and mirror the application of the school's child protection
      policy.

29   Department for Education, *Keeping Children Safe in Education: Statutory guidance for schools and
      colleges,* September 2018, paragraphs 42, 76, 77, 78 and 80
      https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/
      file/741314/Keeping_Children_Safe_in_Education__3_September_2018_14.09.18.pdf

30   Radford, L., Corral, S., Bradley, (et al) *Child abuse and neglect in the UK today,* 2011 (see in particular,
      Section 5): https://www.nspcc.org.uk/globalassets/documents/research-reports/child-abuse-neglect-uk-
      today-research-report.pdf

31   The United Nations Convention on the Rights of the Child, 1989 (ratified by the UK in 1991); the Children
      Act, 1989; and *Keeping Children Safe in Education: Statutory guidance for schools and colleges,*
      September 2018, all define 'child' as a person aged under 18

32   For example, young adults aged 18 or over who are eligible for care leaving services

33   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, page 4: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

34   Barter, Christine, Aghtaie, N., Larkins, C., et al., *Safeguarding Teenage Intimate Relationships (STIR) Connecting online and offline contexts and risks, Briefing Paper 5: Young People's Perspectives on Interpersonal Violence and Abuse in Intimate Relationships,* 2015: https://www.safenet.bg/images/sampledata/files/STIR-Briefing-paper-5-English-Final.pdf

35   Ibid

36   Firmin, C., *Abuse Between Young People: A Contextual Account*. 2017. Oxon: Routledge

37   These widely accepted components of bullying are: (a) it involves unwanted, negative behaviour; (b) it involves a pattern of behaviour repeated over time; (c) it involves an imbalance of power or strength. Whether alleged behaviour constitutes serious bullying will depend on the circumstances and staff should use their professional judgement. The policy ought to sign post, for further information to the school's anti-bullying policy

38   See Disrespect Nobody, *What is Relationship Abuse?* https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/

39   This type of abuse relates to abuse between children aged 16 and 17 who are, or have been, intimate partners or family members. The abuse includes but is not limited to psychological, physical, sexual, financial and emotional

40   This is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or children (under the age of 18) into sexual activity (a) in exchange for something the child/children need(s) or want(s); and/or (b) for the financial advantage or increased status of the individual responsible for/facilitating the abuse. The child/children may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact – it can also occur through the use of technology. Department for Education, *Child Sexual Exploitation. Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation,* February 2017: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

41   'Serious youth violence' is defined by the Home Office Assessment of Policing and Community Safety (APACS) as: 'any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19, i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm.' 'Youth violence' is defined in the same way, but also includes assault with injury offences

42   Sexual behaviours expressed by those under the age of 18 years that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child, young person or adult– Hackett, S. *Children and young people with harmful sexual behaviours*. 2014. London: Research in Practice, cited in Hackett, S., Branigan, P., and Holmes, D. (2019) Operational framework for children and young people displaying harmful sexual behaviours, second edition, London; NSPCC, page 13. The NSPCC's, Research in Practice's and Professor Simon Hackett's harmful sexual behaviour framework should be used alongside the NICE guidelines on harmful sexual behaviour among children and young people (NICE, 2016): https://www.nice.org.uk/guidance/ng55

43   The term 'prejudice-based' violence refers to violence that is directed against a person as a result of a specific characteristic such as age, disability, ethnicity, race, religion or belief. Gender-based violence is a specific form of prejudice-based violence that is directed against one gender as a result of their gender or that affects one gender disproportionately

44   For further information please see Appendices A and B

45   This diagram was developed from Firmin's holistic account of peer-on-peer abuse: Firmin C., and Curtis G., MsUnderstood Partnership, *Practitioner Briefing #1: What is peer-on-peer abuse?* 2015: http://www.msunderstood.org.uk/assets/templates/msunderstood/style/documents/MSUPB01.pdf

46   This diagram is drawn from Firmin's Contextual Circles of Adolescent Vulnerability. Firmin, C., *Abuse Between Young People: A Contextual Account,* 2017. Oxon: Routledge

47   Firmin C., and Curtis G., MsUnderstood Partnership, *Practitioner Briefing #1: What is peer-on-peer abuse?* 2015: http://www.msunderstood.org.uk/assets/templates/msunderstood/style/documents/MSUPB01.pdf

48   The Bully Project: http://www.thebullyproject.com/

49   Firmin C., and Curtis G., MsUnderstood Partnership, *Practitioner Briefing #1: What is peer-on-peer abuse?* 2015: http://www.msunderstood.org.uk/assets/templates/msunderstood/style/documents/MSUPB01.pdf

50   Barter, Christine, Aghtaie, N., Larkins, C., et al., *Safeguarding Teenage Intimate Relationships (STIR) Connecting online and offline contexts and risks, Briefing Paper 2: Incidence Rates and Impact of Experiencing Interpersonal Violence and Abuse in Young People's Relationships,* 2015: http://stiritup.eu/wp-content/uploads/2015/02/STIR-Briefing-Paper-21.pdf

51   Radford, L., Corral, S., Bradley, et al., *Child abuse and neglect in the UK today,* 2011 (see, in particular, Section 5): https://www.nspcc.org.uk/globalassets/documents/research-reports/child-abuse-neglect-uk-today-research-report.pdf
      Schools should research and choose their own statistics. In doing so schools may consult look at the sources listed in Appendix E

52   Please see, for example, London Safeguarding Children Board, London Child Protection Procedures, Part B3: Practice Guidance, Section 15. Children Harming Others: http://www.londoncp.co.uk/chapters/ch_harm_others.html

53   Please see the NSPCC's, Research in Practice's and Professor Simon Hackett's harmful sexual behaviour framework, 2019, page 15: https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework/

54   For further information please see Appendix A

55   Brook, Sexual Behaviours Traffic Light Tool: https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool, and please also see the NSPCC's, Research in Practice's and Professor Simon Hackett's harmful sexual behaviour framework, 2019, page 28: https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour- framework/

56   For further information please see Appendix A

57   NSPCC, *Childline Annual Review 2017/2018, The Courage To Talk,* 2018, page 16: https://learning.nspcc.org.uk/media/1596/courage-talk-childline-annual-review-2017-18.pdf

58   Barter, C., McCarry., M., Berridge, D., et al., *Partner exploitation and violence in teenage intimate relationships,* 2009: https://www.nspcc.org.uk/globalassets/documents/research-reports/partner-exploitation-violence-teenage-intimate-relationships-report.pdf

59   Schools may want to tailor and expand this paragraph based on the gender make-up of their school

60   Jones, L., Bellis MA., Wood S., *Prevalence and risk of violence against children with disabilities: a systematic review and meta-analysis of observational studies,* 2012: https://www.ncbi.nlm.nih.gov/pubmed/22795511

61   Lee, B., Dennell. L., and Logan, C., 2015, Equality and Human Rights Commission, *Prejudice-based Bullying in Scottish Schools: A research report:* https://www.equalityhumanrights.com/sites/default/files/prejudice-based_bullying_in_scottish_schools_research_report_0.pdf

62   Ringrose, J., Gill, R., Livingstone, S., et al., *A qualitative study of children, young people and "sexting",* a report prepared for the NSPCC. London: NSPCC, 2012: https://www.nspcc.org.uk/globalassets/documents/research-reports/sexting-research-summary.pdf

63   Firmin, C., *This is it. This is my life...Female Voice in Violence, Final Report,* 2011. London: ROTA

64   Schools should tailor this sentence according to their particular circumstances

65   Ibid

66   Ibid

67   Firmin, C., *This is it. This is my life...Female Voice in Violence, Final Report,* 2011. London: ROTA

68   Ibid

69   Ibid

70   Ibid

71   For further information please see earlier section entitled 'When does behaviour become problematic or abusive?' and Appendix A

72   Schools should tailor this wording depending on their local authority's services and response to peer-on-peer abuse. Please note that where a school's local partnership has a harmful sexual behaviour framework in place this framework will need to be referred to in this policy

73   For further information please see Appendix A

74   Department for Education, W*orking Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children,* July 2018: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf

75   HM Government, *Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers,* July 2018: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

76   Firmin, C., Curtis, G., Fritz, D., et al., *Practitioner Briefing #1: Towards a Contextual Safeguarding response to peer-on-peer abuse,* 2016, page 29: https://contextualsafeguarding.org.uk/assets/documents/Working-with-schools-and-alt-education-providers.pdf

77   NSPCC, *Childline Annual Review 2017/2018, The Courage To Talk,* 2018, page 16: https://learning.nspcc.org.uk/media/1596/courage-talk-childline-annual-review-2017-18.pdf

78   Contextual Safeguarding Network, *School Assessment Toolkit,* 2018: https://contextualsafeguarding.org.uk/publications/school-assessment-toolkit

Appendix A: Further information

79   Firmin, C., and Curtis, G., MsUnderstood Partnership, *Practitioner Briefing #1: What is peer-on-peer abuse?* 2015: http://www.msunderstood.org.uk/assets/templates/msunderstood/style/documents/MSUPB01.pdf

80   Firmin, C. *Contextual Safeguarding: An overview of the operational, strategic and conceptual framework,* 2017. Luton: University of Bedfordshire

81   Please see the NSPCC's, Research in Practice's and Professor Simon Hackett's harmful sexual behaviour framework, 2019: https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework/, and the NICE guidelines on harmful sexual behaviour among children and young people (NICE, 2016): https://www.nice.org.uk/guidance/ng55

82   Ibid, page 13 - which cites reference to the definition of harmful sexual behaviours as having been derived from Hackett, S. *Children and young people with harmful sexual behaviours,* 2014. London, Research in Practice. 2014.

83   Further information can be found at: http://aimproject.org.uk/. Please note that the AIM Project is currently in the process of developing its AIM3 framework to replace the current AIM2 model. It anticipates that AIM3 should be widely available from late Spring 2019 and will release details of the framework early in 2019

84   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: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

85   Work on a digital behaviour continuum is still underway – once it is completed details will be included in this toolkit

86   It should be noted that there is currently no definitive list of indicators of peer-on-peer abuse. The above list has been drawn from the NSPCC's *Signs, symptoms and effects of child abuse and neglect:* https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/

87   Our guidance on safety plans is informed by the NSPCC's safety plan template, provided as a resource within the NSPCC's online course on *Managing sexualised behaviour in schools:* https://learning.nspcc.org.uk/training/schools/managing-sexualised-behaviour-in-schools-online-courses/

88   All references to 'child/children' in this section refer to those in respect of whom their/a safety plan is being carried out. This may be a child who is allegedly responsible for the behaviour, a child who is allegedly responsible for experiencing the behaviour, or any other child affected by or at risk of the alleged behaviour

89   For further details please see the section in the template policy entitled 'On-going proactive work for a whole-school contextual safeguarding approach'

90   For further guidance in relation to safety plans please see the NSPCC's online course on *Managing sexualised behaviour in schools* https://learning.nspcc.org.uk/training/schools/managing-sexualised-behaviour-in-schools-online-courses/

Appendix B: Template youth involved sexual imagery policy

91   Barter, Christine, Aghtaie, N., Larkins, C., et al., *Safeguarding Teenage Intimate Relationships (STIR) Connecting online and offline contexts and risks, Briefing Paper 5: Young People's Perspectives on Interpersonal Violence and Abuse in Intimate Relationships,* 2015, page 5: https://www.safenet.bg/images/sampledata/files/STIR-Briefing-paper-5-English-Final.pdf

92   For the purposes of this appendix, 'child', 'youth' and 'young person' refers to anyone under the age of 18; 'adult' refers to anyone aged 18 or over

93   Smellie, D., *Alert to Pupils: The legal dangers of sexting - what children, young people and adults working with them need to know,* 2016: https://www.farrer.co.uk/Global/Briefings/Alert%20to%20Pupils%20-%20The%20legal%20dangers%20of%20sexting.pdf

94   This is in accordance with the UK Council for Child Internet Safety's advice *Sexting in schools and colleges: responding to incidents and safeguarding children*: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

95   All such incidents should be responded to with reference to the school's online safety policy, and in line with the school's child protection policy

96   Ibid

97   Ibid

98   A helpful guide to responding to such incidents is the South West Grid for Learning's resource *So You Got Naked Online*: https://d1afx9quaogywf.cloudfront.net/sites/default/files/Resources/So%20you%20got%20naked%20online.pdf

99   UK Council for Child Internet Safety, *Sexting in schools and colleges: responding to incidents and safeguarding young people,* 2016: https://www.safeguardinginschools.co.uk/wp-content/uploads/2016/08/Sexting-in-schools-and-colleges-UKCCIS-August-2016.pdf

Appendix D: Case studies

100   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: Brook, Sexual Behaviours Traffic Light Tool:
https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool

101   Ibid

102   Ibid

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