

HINDLE'S

SCHOOL OF EXCELLENCE LTD

CHILD-ON-CHILD ABUSE POLICY

Including sexual violence, sexual harassment and harmful sexual behaviour

Setting	Hindle's School of Excellence Ltd
Address	115 Rochdale Road, Bury, BL9 7BA
Policy owner	Director / Designated Safeguarding Lead
Approved by	Director
Effective date	1 September 2026
Review date	September 2027, or sooner if guidance changes

Safeguarding is everyone's responsibility

All concerns must be reported immediately to the DSL or a deputy. If a child is in immediate danger, call 999.

Policy information and responsibilities

Designated Safeguarding Lead (DSL)	Joanne C. Hindle
Deputy DSL	The current named deputy shown in the Safeguarding and Child Protection Policy and staff safeguarding display
All staff, tutors, trainees and volunteers	Read, understand and follow this policy; report concerns without delay; never investigate independently
Learners	Are encouraged to report concerns to any trusted adult and will be listened to and supported
Parents/carers	Are expected to support safety plans and communicate relevant concerns promptly

1. Purpose and scope

Hindle's School of Excellence Ltd is committed to providing a safe, respectful and inclusive environment. Child-on-child abuse is never acceptable, will not be tolerated or dismissed as banter, and will be addressed even when it takes place outside the setting or online.

This policy applies to every child and young person under 18 who attends, visits or receives tuition or alternative provision from Hindle's, whether on site, at home, online, during transport, on visits, at another placement or in the wider community. It applies to all staff, tutors, agency workers, trainees, volunteers and contractors.

Where a learner is aged 18 or over, adult safeguarding procedures will also be considered. The setting will work with the relevant local authority and partner agencies according to where the child lives and where the incident occurred.

2. Legal and statutory framework

This policy has been prepared for use from 1 September 2026 and should be read with the setting's Safeguarding and Child Protection Policy. It reflects:

- Keeping Children Safe in Education 2026 (Department for Education), including Part 5 on child-on-child sexual violence and sexual harassment.
- Working Together to Safeguard Children 2026.
- The Children Acts 1989 and 2004; Education Act 2002; Equality Act 2010; Human Rights Act 1998; Data Protection Act 2018 and UK GDPR.
- Voyeurism (Offences) Act 2019; Sexual Offences Act 2003; Protection from Harassment Act 1997; and relevant criminal law.
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS), and local safeguarding partnership procedures.

Related internal policies include safeguarding and child protection, behaviour, anti-bullying, online safety, filtering and monitoring, mobile phones and smart technology, staff code of

conduct, allegations against staff, attendance, complaints, whistleblowing, equality, SEND, safer recruitment, data protection and risk assessment.

3. Definition and forms of child-on-child abuse

Child-on-child abuse is abuse of a child by one or more other children. It can occur between children of any age, sex, sexual orientation, gender identity, ability, culture or background; within intimate or non-intimate relationships; and in person or online. It may be a single incident or a pattern of behaviour. Power imbalance may arise through age, size, status, popularity, disability, access to images or information, or group pressure.

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- physical abuse, such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm;
- sexual violence, including rape, assault by penetration and sexual assault;
- sexual harassment, including sexual comments, jokes, taunting, unwanted touching, displaying sexual material and online sexual harassment;
- causing someone to engage in sexual activity without consent;
- consensual or non-consensual sharing of nude or semi-nude images or videos (also called youth-produced sexual imagery);
- upskirting, which is a criminal offence;
- abuse in intimate personal relationships between children;
- initiation or hazing-type violence and rituals;
- coercive, controlling, threatening, exploitative or financially abusive behaviour; and
- technology-assisted abuse, including impersonation, image-based abuse, sexualised messages, stalking, location tracking, threats and harassment.

4. Our safeguarding culture

All reports, concerns and signs are taken seriously. The absence of reports does not mean abuse is not happening. Staff will challenge inappropriate language and behaviour and will not use phrases such as “just banter”, “boys being boys”, “part of growing up” or “they are both as bad as each other”. A zero-tolerance approach means the setting acts on concerns; it does not mean automatic exclusion or a one-size-fits-all sanction.

The setting recognises that children who display harmful behaviour may themselves have unmet needs, trauma or vulnerability. This does not reduce the seriousness of the behaviour or the need to protect the child who has been harmed. Support and accountability will be considered for all children involved.

5. Vulnerability and intersectionality

Any child may be affected. Staff will be alert to increased or different risks for children with SEND, communication needs, prior trauma, social care involvement, care experience, mental-health needs, low self-esteem, isolation, protected characteristics, questioning identity, or limited access to trusted adults. Girls are more likely to experience sexual violence and harassment, while boys and LGBT+ children may face barriers to reporting. Staff must avoid assumptions and use communication methods appropriate to the child.

6. Recognising possible indicators

- unexplained injuries, damaged belongings, missing money or repeated “accidents”;
- withdrawal, anxiety, anger, distress, self-harm, sleep problems or a marked change in presentation;
- avoidance of a person, room, session, device, journey or online platform;
- sexualised language or behaviour that is not developmentally expected;
- fear about images, messages or rumours being circulated;
- changes in attendance, attainment, concentration, friendships or use of technology; and
- a disclosure, partial disclosure, third-party report, online evidence or staff observation.

Indicators are not proof. Staff must record and report concerns; they must not question repeatedly, promise confidentiality, search devices without authority or attempt to determine whether an allegation is true.

7. Prevention

Hindle's will reduce risk through a whole-setting approach that includes:

- age-appropriate teaching about respectful relationships, consent, boundaries, equality, online safety, reporting routes and bystander action;
- clear behaviour expectations and consistent challenge of sexist, sexualised, homophobic, biphobic, transphobic, racist, ableist and other discriminatory language;
- safe recruitment, staff training, appropriate supervision, site security and safer use of online platforms;
- listening to learner voice and checking whether particular spaces, times or activities feel unsafe;
- reasonable adjustments so children with SEND can understand, communicate and report concerns;
- working with parents, carers, commissioners and other education settings while preserving necessary confidentiality; and
- reviewing patterns of incidents, including location, time, protected characteristics and online contexts, to improve prevention.

8. How learners can report

A learner may speak to any member of staff, use an agreed communication method, ask a parent/carer or friend to report, or contact an external helpline. Reports may be verbal, written, online, anonymous or made by a witness. Staff will explain that information is shared only with people who need it to keep children safe. A learner will not be blamed or penalised for making a report in good faith.

9. Immediate response to a report

1. Ensure immediate safety. Separate children if required, arrange first aid or emergency help and preserve dignity. Call 999 if anyone is in immediate danger or a crime is in progress.
2. Listen calmly and take the child seriously. Use the child's own words. Do not express shock, blame, disbelief or judgement.

3. Do not promise confidentiality. Explain what will happen next and that the DSL must be told.
4. Ask only open questions needed to clarify immediate safety, such as “Tell me what happened” or “What do you need right now?”. Do not investigate or ask leading questions.
5. Make a contemporaneous, factual record, including date, time, people present, the exact words used, observed injuries or demeanour, action taken and any available evidence.
6. Report to the DSL or deputy immediately using the setting’s safeguarding recording system. If the concern involves the DSL, report to the Director or appropriate external safeguarding route. Staff may make a direct referral to children’s social care or police if necessary, particularly if action is not being taken.
7. Preserve evidence. Do not view, copy, forward, print or save nude or semi-nude images. Secure devices or messages only in line with police, UKCIS and safeguarding advice.
8. The DSL will consider medical needs, forensic evidence, police/social-care referral, parents/carers, the wishes of the child, communication needs, risk to others and immediate education arrangements.

10. DSL decision-making and referrals

The DSL will make and record a case-by-case, child-centred decision. Relevant factors include the nature and severity of the alleged behaviour; ages and developmental stages; consent; coercion; power imbalance; repetition; disability or communication needs; impact on the child; risk of escalation; online reach; public interest; wider peer or community risks; and whether a crime may have been committed.

The DSL may choose one or more of the following routes, keeping the decision under review:

- manage internally with safeguarding oversight, education, support and proportionate behaviour action;
- offer or request early help and multi-agency support;
- refer to children’s social care where a child is in need or suffering, or likely to suffer, significant harm;
- report to the police where a crime may have been committed, following police advice and local arrangements; and
- consult specialist services regarding harmful sexual behaviour, exploitation, mental health, SEND or online harm.

A referral to police or social care does not remove the setting’s duty to safeguard, support, risk assess and maintain suitable education. The setting will not wait for the conclusion of another agency’s process before taking proportionate protective action.

11. Sexual violence, sexual harassment and consent

Sexual violence and sexual harassment can occur between two children or within a group, inside or outside the setting and online. Consent must be free, informed, specific, mutual and capable of being withdrawn at any time. A child under 13 cannot consent to sexual activity. The law also protects children under 16, and sexual activity may be abusive even where children describe it as consensual because of age, coercion, exploitation or power imbalance.

Where rape, assault by penetration or sexual assault is reported, the starting point is that it should be passed to police, unless there is a sound, recorded reason following consultation with

relevant agencies not to do so. The DSL will follow current KCSIE and local procedures. Parents/carers will normally be informed unless doing so may place a child at additional risk or conflict with police/social-care advice.

12. Sharing nudes and semi-nudes

All incidents involving nude or semi-nude images will be referred to the DSL immediately. Staff must not view the image unless there is a clear, exceptional safeguarding reason authorised by the DSL; must never copy, print, share or save it; and must not ask a child to delete material before advice is obtained. The DSL will follow current UKCIS guidance, consider police/social-care referral and record the decision. Possession and distribution may constitute offences, but responses must remain safeguarding-led and proportionate.

13. Risk assessment and safety planning

The DSL will complete and regularly review a written risk and needs assessment for reported sexual violence and for other serious or repeated child-on-child abuse. It will be shared only with staff who need the information to keep children safe and provide suitable education.

Consider	Possible controls	Review
Children involved	Separate arrival/departure, rooms, groups, breaks or online spaces where necessary; identify trusted adults; avoid placing responsibility on the harmed child.	After any change
Location and context	Supervision, seating, transport, toilets, corridors, home tuition, online access and off-site provision.	At least weekly initially
Support needs	SEND adjustments, communication aids, medical/mental-health support, advocacy and specialist referrals.	With child/parent
Evidence and information	Secure records, police advice, limited need-to-know sharing, image-handling safeguards.	Ongoing
Wider risks	Other children, sibling/peer groups, retaliation, rumours, online circulation and community context.	Ongoing

14. Children sharing learning spaces

The setting will not automatically require the child who has reported harm to change their education arrangements. Decisions about shared classrooms, sessions, transport, breaks or online spaces will be made through the risk assessment, with the harmed child's wishes and best interests given careful weight. Where a rape or assault by penetration is reported, the alleged perpetrator should normally be removed from shared classes or spaces while the allegation is progressed, in line with KCSIE and case-specific advice. Any arrangement will avoid implying blame or predetermining an outcome.

15. Support for the child who has been harmed

- a named trusted adult and regular, private check-ins;
- being listened to and kept informed in accessible language;
- reasonable adjustments to attendance, timetable, workload, seating or online access;
- protection from retaliation, intimidation, rumours, bullying and repeated questioning;
- referral to health, counselling, sexual assault, advocacy, SEND or specialist support where appropriate; and
- a clear plan for continued education, reviewed with the child and parent/carers where safe.

16. Response to the child alleged to have caused harm

The alleged behaviour will be taken seriously without treating an allegation as proven before the relevant process concludes. The child will be safeguarded, heard, supported and given developmentally appropriate information. The setting will consider unmet needs, SEND, trauma, exploitation and risk to self or others, alongside accountability and proportionate behaviour action. Support may include a trusted adult, safety plan, education about consent and boundaries, specialist harmful sexual behaviour assessment, early help or children's social care referral.

Any suspension, exclusion or termination of placement will be considered separately under the relevant policy and commissioning arrangements. It will never replace safeguarding action or be used solely to remove reputational difficulty.

17. Parents, carers and commissioners

Parents/carers of children involved will normally be informed promptly and separately, unless this would put a child at greater risk, prejudice a police investigation or conflict with social-care advice. Information about another child will be limited. Commissioners and other settings will be told only what is necessary to protect children and coordinate provision. The DSL will record what was shared, with whom and why.

18. Police and criminal processes

Where police are involved, Hindle's will cooperate, preserve evidence and seek advice about interviews, bail conditions, charging decisions and education arrangements. The setting will continue its own safeguarding and behaviour processes to the extent that this does not prejudice a criminal investigation. A decision by police or prosecutors to take no further action does not mean the incident did not occur and does not prevent safeguarding, support or proportionate internal action.

19. Outcomes and unsubstantiated, unfounded, false or malicious reports

The DSL will record the outcome and review support and risk management after any social-care, police, court or internal process. Where a report is unsubstantiated or unfounded, the setting will consider whether the reporting child or another child needs help or protection. A deliberately invented or malicious allegation may be addressed under the Behaviour Policy, but

the setting will not assume malice merely because evidence is insufficient, an account changes, a child withdraws a report or no criminal action is taken. Children who report in good faith will not be sanctioned.

20. Confidentiality, information sharing and records

Records will be factual, dated, timed, signed or attributable, stored securely and kept separately from general academic records where appropriate. Information will be shared on a need-to-know basis when it is necessary and proportionate to safeguard a child. Data protection law does not prevent appropriate safeguarding information sharing. The DSL will document referrals, consultations, decisions, reasons, actions, outcomes and reviews. Records will be retained and transferred in line with current safeguarding and data-retention requirements.

21. Staff conduct and allegations involving adults

If a concern indicates that an adult may have harmed a child, behaved in a way that may pose a risk, committed a relevant offence or may be unsuitable to work with children, the allegations-against-staff procedures and local authority designated officer (LADO) arrangements must be followed. Low-level concerns about adults must be reported under the Staff Code of Conduct and Low-Level Concerns procedure. Child-on-child abuse must not be misclassified to avoid either process.

22. Training, monitoring and review

All staff will receive induction and regular safeguarding updates covering recognition, reporting, sexual violence and harassment, harmful sexual behaviour, online abuse, SEND and professional curiosity. The DSL will review incidents and patterns, audit records and safety plans, obtain learner feedback and ensure lessons inform curriculum, supervision and site arrangements. This policy will be reviewed annually and whenever legislation, statutory guidance, local procedures or the setting's circumstances change.

23. Local reporting and emergency contacts

Area	Daytime / professional referral	Out of hours	Emergency
Bury	MASH: 0161 253 5678; professionals use the Bury online referral route.	0161 253 6606	999 if immediate danger
Bolton	Integrated Front Door: 01204 331500, option 2; follow up using the online referral form within one working day where directed.	01204 337777	999 if immediate danger
Other area	Contact the child's home local authority children's social care / safeguarding partnership.	Use that authority's emergency duty team.	999 if immediate danger

Greater Manchester Police: 999 in an emergency; 101 for non-emergency police contact. NSPCC Helpline: 0808 800 5000. Childline: 0800 1111.

Contact details must be checked before use because local arrangements can change. The DSL should use the current local safeguarding partnership and council referral pages.

24. Support services

- Childline – 0800 1111 – confidential support for children and young people.
- NSPCC Helpline – 0808 800 5000 – advice for adults concerned about a child.
- CEOP Safety Centre – report online sexual abuse or exploitation.
- The Mix – support for young people under 25.
- Rape Crisis England & Wales and NHS sexual assault referral centres (SARCs) – specialist sexual violence support.
- Kooth or locally commissioned children and young people's mental-health services, where available.

25. Key sources

- **Keeping Children Safe in Education 2026** – <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- **Working Together to Safeguard Children 2026** – <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- **Bury – report a child at risk** – <https://www.bury.gov.uk/social-care-and-support/child-care-and-support/report-a-child-at-risk>
- **Bolton – worried about a child** – <https://www.bolton.gov.uk/safeguarding-protecting-children/reporting-child-abuse>
- **UKCIS – sharing nudes and semi-nudes guidance** – <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Approval and review record

Version	Approved by	Approval date	Next review
1.0	Joanne C. Hindle, Director	1 September 2026	September 2027
Interim review / amendment:			
Signature:			