Sexual Violence & Sexual Harassment Policy (Including Child-on-Child Abuse)

This policy applies to the whole school (all teaching, support and supply staff, contractors, and volunteers working in the school along with the board of directors), including Boarding and the Early Years.

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Agreed by:

Head of School	Designated Safeguarding Lead (DSL)	Chair of the Board of Directors
Bryan Nixon	Jason Tait	David King
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TASIS England is committed to safeguarding and promoting the welfare of students and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential through our Mission.

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1. Introduction:

The Board of Directors, Senior Leadership Team, and all staff and volunteers at TASIS England are committed to the prevention, early identification and appropriate management of sexual violence and sexual harassment, including child-on-child abuse (as defined below) both within and beyond the school. In particular, we:

- believe that in order to protect children, we need to be aware of the level and nature of risk to which students are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to our specific safeguarding context
- take a contextual whole-school approach to preventing and responding to all forms of child-on-child abuse
- regard the introduction of this policy as a preventative measure, and do not feel it is acceptable merely to take a reactive approach to abuse in response to alleged incidents of it
- recognise national, and increasing, concern about this issue, and wish to implement this policy in order to ensure that our students are safe, 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.

2. Our Policy:

- We set out our strategy for preventing, identifying and appropriately managing all forms of child-on-child abuse (including sexual violence and sexual harassment).
- The policy applies to the Board of Directors, Senior Leadership Team, faculty, staff, volunteers, bank, agency staff and contractors etc. It is reviewed annually and updated as may be required to ensure it continually addresses the risks to which students are or may be exposed. Faculty/staff and student feedback is considered during the annual review, which involves and is informed by an assessment of the impact and effectiveness of this policy over the previous year.
- It constitutes the school's overarching policy for any issue that could constitute sexual violence and/or sexual harassment (including child-on-child abuse).
- It relates to, and should be read alongside, the school's Safeguarding and Child Protection Policy and any other relevant policies including, but not limited to, Anti-bullying (including cyber-bullying), Online safety, Students Missing Education, Behaviour Management, Discipline and Sanctions, and Data Protection (all of which can be found by clicking this link to our school website). Dependent on the nature of the child-on-child abuse (such as physical or cyber-bullying), procedures from these respective policies will be followed
- It ensures that the school takes a safeguarding approach to all individuals involved in allegations of, or concerns about, sexual violence and/or sexual harassment, 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 child-on-child abuse, may themselves be vulnerable and may have been victimised by peers, parents or adults prior to their abuse of peers
- It uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18.

2.1. We have nonetheless chosen not to restrict our approach to child-on-child abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all TASIS England students, regardless of age. Although the starting point is that the school's response to any form of child-on-child abuse should be the same for all students, regardless of age, there are likely to be additional considerations in relation to 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 - to children and, in the case of adult social care services, to vulnerable adults or those with care and support needs. Similarly, the school's response to incidents involving the exchange of nude or semi-nude images (also known as sexting or youth produced sexual imagery) will need to differ depending on the age of the students involved. There would also be a more significant criminal justice response in relation to any student responsible for abuse who is aged 18 or over.

2.2. We use the term victim-survivor(s) and alleged perpetrator(s) and, where appropriate, perpetrator(s). However, we are conscious of using these terms when speaking in front of children and may use terms which the individual child is most comfortable with. This should be read in conjunction with the Surrey Safeguarding Children Partnership's (SSCP) Safeguarding Policy and Procedures, and any relevant practice guidance issued by it.

3. Legal Status:

3.1. This policy is guided by the following government guidance:

- Part 3 (paragraph 10) of The Education (Independent School Standards) (England) Regulations 2014
- Preventing and Tackling Bullying (July 2017), Cyberbullying: Advice for headteachers and school staff (DfE- November 2014), Advice for parents and carers on cyberbullying (DfE- November 2014) and Section 89 of the Education and Inspections Act 2006,
- The Equality Act 2010 and the Public Sector Equality Duty
- Keeping Children Safe in Education (KCSIE 2024) information for all schools and colleges
- what to do if you're worried a child is being abused (HM Government: March 2015)
- Working Together to Safeguard Children (WTSC) (HM Government: version currently in force) which also refers to non-statutory advice, Information sharing advice for practitioners providing safeguarding services along with the Disclosure and Barring Service (DBS)
- Mental Health and Behaviour in Schools (advice for schools)
- Relationship Education, Relationships and Sex Education and Health Education (statutory guidance for schools)
- Behaviour in Schools (DfE: Last updated February 2024)
- Children Missing Education (advice for schools)
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024)

4. Monitoring and review

This policy is subject to continuous monitoring, refinement and audit by the Head of School who will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed policy which will be made available to them in either a hard copy or electronically.

5. Roles and Responsibilities

5.1. **Board of Directors**:

- Oversee compliance with safeguarding requirements and ensure the policy is effectively implemented and reviewed annually.
- Monitor the outcomes of the policy, ensuring safeguarding measures are robust and effective.

5.2. **Head of School and Senior Leadership Team**:

- Ensure the policy is embedded across all sections of the school, including boarding and Early Years provision.
- Provide resources and training to support staff in fulfilling their safeguarding duties.

5.3. **Designated Safeguarding Lead (DSL) and Deputies**:

- Take the lead on responding to incidents of sexual violence, harassment, and harmful sexual behaviours (HSB).
- Liaise with external agencies and monitor safeguarding records to identify trends or risks.

5.4. **All Faculty and Staff**:

- Remain vigilant for signs of abuse and report concerns immediately.
- Challenge inappropriate behaviours, including low-level sexualised comments, to prevent normalisation of abuse.

5.5. **Students**:

- Contribute to a safe, respectful school environment and report concerns through the school's safeguarding channels including the Student Voice Page.

6. Aims

This policy outlines our procedures and working practices of dealing with and minimising the risk of child-on-child abuse. We aim to:

- Define what is meant by sexual violence and sexual harassment– its indicators
- Outline what our procedures are in dealing with an allegation or suspected case of child-on-child abuse
- Explain how we minimise the risks of child-on-child abuse, and
- Detail the support for victim-survivors of child-on-child abuse, including the use of external agencies.

7. What is child-on-child abuse?

For these purposes, child-on-child 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).

7.1. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying, physical and/or emotional bullying
- relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, so-called 'jokes' (comments), taunting, and online sexual harassment
- non-consensual sharing of nudes and semi-nude images and/or videos
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim-survivor humiliation, distress or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

7.2. These 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. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to child-on-child abuse, therefore, needs to consider the range of possible types of child-on-child abuse set out above and capture the full context of children's experiences. We do this by adopting a Contextual Safeguarding approach and by ensuring that our response to incidents of child-on-child abuse considers any potential complexity.

7.3. Where it is alleged that a student has committed any type of child-on-child abuse which is not of a sexual nature (e.g., hitting or emotional bullying), this would be dealt with under our Anti-Bullying (including Cyber Bullying) and Behaviour Policies, which set out the sanctions for such behaviour.

7.4. If there is an allegation of abuse which is considered sexual violence and/or sexual harassment, this would be dealt with through the procedures set out in this policy.

8. Sexual violence and sexual harassment between children – Context

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and into Junior and Senior Grade. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part One of Keeping Children Safe in Education (KCSIE 2024), our faculty and staff working with children maintain an attitude of 'it could happen here'.

8.1. We have a duty to be aware of, and respond appropriately to all reports and concerns, including those outside the school and or online. We make it clear to our staff and students that we have a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable, and it will not be tolerated, and it should never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. We challenge physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. We train our staff that dismissing or tolerating such behaviours risks normalising them. Not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. We further understand that all of the above can be driven by wider societal factors beyond the school. Societal factors can be the shared beliefs and behaviours that influence how individuals and/or groups act and interact, including attitudes towards gender roles, consent, and relationships. These norms can sometimes perpetuate harmful behaviours, such as the normalisation of harassment, sexist and gender stereotypes, sexist and misogynistic language, or unrealistic expectations influenced by the media and digital culture.

9. Sexual Violence

At TASIS England, we take our definition of sexual violence from the Sexual Offences Act 2003, which considers rape, assault by penetration and sexual assault all types of sexual violence. The school recognises that sexual violence can happen both inside and outside of school and can occur online and offline. When referring to sexual violence we are referring to sexual offences as described within KCSIE 2024, below:

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

- **Assault by Penetration:** A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

- **Sexual Assault:** A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents (schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).

- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

10. What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g., to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape. Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent.

10.1. Faculty and staff, especially the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSLs) understand consent. This is especially important if a child reports they have been raped or sexually assaulted in any way. It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to the DSL and DDSL's additional training in this area, they lead the school's response and, if ever in any doubt, they will seek expert advice.

10.2. Sexual violence and sexual harassment can be between two children, or a group of children. Both sexes may be affected, although girls are more likely to be victim-survivors of sexual violence, and boys are more likely to be perpetrators of sexual harassment. We recognise that children with Special Educational Needs and Disability (SEND) are likely to be more vulnerable. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they will discuss this with the DSL.

11. Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. We make it clear that all forms of sexual violence and harassment are unacceptable and will not be tolerated. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- verbal or gestural sexual comments or taunting
- physical behaviour, such as: deliberating brushing against someone, interfering with someone's clothes (this may cross a line into sexual violence) and displaying pictures, photos or drawings of a sexual nature, and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nude and semi-nude images and videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges). It should be noted that taking and sharing nude photographs of children is a criminal offence
  - sharing of unwanted explicit content
  - upskirting (this is a criminal offence)
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media
  - sexual exploitation, coercion and threats.

12. Harmful Sexual Behaviours

As the National Society for the Prevention of Cruelty to Children (NSPCC) explains 'children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal, abusive and violent'. Our staff 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 and is used throughout the NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework, as well as this policy. For the purpose of this 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.

12.1. We use the Brook Sexual Behaviours Traffic Light Tool to demonstrate the range of sexual behaviours presented by children, when seeking to understand a student's sexual behaviour and deciding how to respond to it. https://www.brook.org.uk/education/sexual-behaviours-traffic-light-tool/. Staff should always use their professional judgement and discuss any concerns with the DSL. Where an (alleged) incident involves a report of sexually harmful behaviour, staff should consult the DfE's Advice.

13. Contextual Safeguarding

This policy encapsulates a Contextual Safeguarding approach, which:

- 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 the home in public environments (including on the internet) 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 identify and challenge harmful school cultures, thus improving the pre-existing school environment.

13.1. At TASIS England we recognise that young people's behaviours, levels of vulnerability and levels of resilience are all informed by the social, public and private contexts in which young people spend their time. Additionally, we help to promote a culture of safety within the curriculum and around the school regarding students' online activities – a place where young people spend an increasing amount of time, raising their exposure to potential abuse.

13.2. We also recognise that safeguarding risks can arise from peer groups, online interactions, and societal factors. Our Contextual Safeguarding approach includes:

- **Curriculum Integration**:
  - Delivering lessons on consent, relationship dynamics, and online safety within PSHEE and RSE programs.
  - Promoting healthy relationships and addressing stereotypes that perpetuate harmful behaviours.
- **Environmental Safeguards**:
  - Reviewing physical spaces and peer dynamics to identify areas where students may feel unsafe.
  - Providing proactive pastoral support for vulnerable groups.
- **Digital Safety**:
  - Educating students and staff on identifying and reporting online abuse, including explicit imagery and harassment.
  - Providing workshops and resources on navigating digital environments safely.

14. Assessing behaviour

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.

15. 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 et al (2016) continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond.

15.1. 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 in response to other alleged behaviour involving reports of other types of abuse. For example, the issue of consent, and the nuances around it, is 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 reported cases of alleged sexual behaviour.

15.2. In addition, the school could be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional, physical and digital behaviour. 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 context. For example, an incident involving youth produced sexual imagery may be inappropriate in one context, for example, when exchanged between two children in a consenting relationship, and abusive in another, as in (a) image 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.

15.3. Behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies. For example, a physical fight between two children may not constitute child-on-child 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.

15.4. The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual student basis but could also apply across the student body.

15.5. Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which schools need to take a whole-school approach 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 arranging for an external person to deliver a grade level intervention exercise, revising the school's Sex and Relationship Education programme, and/or a discussion around whether anything is happening within the wider community that might be affecting the students' behaviour.

15.6. 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 of the concern(s)/allegation(s) is considered or suspected by the DSL to constitute child-on-child abuse, the school will follow the procedures set out below.

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

All staff are alert to the wellbeing of students and to signs of abuse, and will engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as their experiences will differ. Children may not find it easy to tell staff about their abuse verbally.

16.1. Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse (please see our child protection policy for indicators 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.

16.2. 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 are 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/carers 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 their 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.

16.3. The power dynamic that can exist between children is also very important when identifying and responding to their behaviour. In all cases of child-on-child 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.

16.4. Any child can be vulnerable to child-on-child 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 child-on-child 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 child-on-child abuse. Children who are questioning or exploring their sexuality or gender may also be particularly vulnerable to abuse by their peers.

16.5. Research suggests that child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of child-on-child abuse within their setting and recognise that these will play out differently in single sex, mixed or gender- imbalanced environments.

17. How we raise awareness of and prevent child-on-child abuse

The school actively seeks to raise awareness of and prevent all forms of child on-child abuse by educating all Board of Directors, Senior Leadership Team, faculty, staff and volunteers, students, and parents about this issue. This includes:

- Training all Board of Directors, Senior Leadership Team, faculty, staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. This includes (a) Contextual Safeguarding, (b) the identification and classification of specific behaviours, and (c) the importance of taking seriously all forms of child-on-child abuse (no matter how low level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay or teasing. Training includes case studies which the staff design themselves.
- Educating children about the nature and prevalence of child-on-child abuse via PSHEE 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 discrimination or 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 child-on-child abuse.

18. Engaging parents on this issue by:

- talking about it 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
- encouraging parents to hold the school to account on this issue, and
- ensuring that all child-on-child abuse issues are fed back to the school's safeguarding team so that they can identify and address any concerning trends and students who may require additional support.

18.1. This is done by way of a weekly safeguarding meeting by school sections at which all concerns about students (including child-on-child abuse issues) are discussed. The safeguarding team aims to:

- challenge the attitudes that underlie such abuse (both inside and outside the classroom)
- work with the Board of Directors, Senior Leadership Team, all faculty, staff and volunteers, students and parents to address discrimination, equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community
- create conditions in which our students can aspire to and realise safe and healthy relationships
- create a culture in which our students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to, and
- respond to cases of child-on-child abuse promptly and appropriately.

18.2. Alongside our whole-school ethos, values and standards of behaviour, we have established a preventative planned curriculum which prepares students for life in modern Britain. This programme considers the age and stage of development for our students alongside any SEND needs they may have, tackling such issues as:

- healthy and respectful relationships
- what respectful behaviour looks like
- consent
- stereotyping
- equality
- body confidence and self-esteem
- prejudiced behaviour
- understanding that sexual violence and sexual harassment is always wrong, and
- addressing cultures of sexual harassment.

18.3. This programme forms part of our PSHEE and Relationship and Sex Education (RSE) curriculum. Please see our PSHEE and RSE Policies and Schemes of Work for more detail, available on the school website.

19. Multi-agency working

The school actively engages with its local partners in relation to child-on-child abuse, and works closely with, for example, Surrey Local Safeguarding Children Partnership (SLSCP), Surrey Children's Single Point of Access (C-SPA), children's social care, and/or other relevant agencies, and other schools.

19.1. 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 child-on-child abuse. They help the school:

- to develop a good awareness and understanding of the different referral pathways that operate in the local area, as well as the preventative and support services which exist
- to ensure that our students can access the range of services and support they need quickly
- to support and help inform our local community's response to child-on-child abuse, and
- to increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our students.

19.2. The school actively refers concerns/allegations of child-on-child abuse where necessary to Surrey C-SPA, children's social care, and/or other relevant agencies. This is particularly important because child-on-child 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 incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

20. What should you do if you suspect either that a child may be at risk of or experiencing sexual violence or sexual harassment by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?

- If a student is in immediate danger, or at risk of significant harm, a referral to children's social care (if the student is aged under 18) and/or the police should be made immediately. Dial **0300 470 9100 (9:00am – 5:00pm Mon-Fri)** email **cspa@surreycc.gov.uk.** During evenings, weekends and bank holidays, the **Emergency Duty Team** is available: **01483 517898** email: **edt.ssd@surreycc.gov.uk** .
- 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. Refer to our Safeguarding Children - Child Protection Policy for further details, available on the school website.

20.1. 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 will discuss their concern with the DSL without delay, in accordance with the school Safeguarding Children - Child Protection Policy so that a course of action can be agreed.

21. The Immediate Response to a report - General Principles

It is essential that we handle all concerns/allegations of child-on-child abuse sensitively, appropriately and promptly to ensure current and future victim-survivors of sexual violence and sexual harassment feel confident to report or come forward. The way in which they are responded to can have a significant impact on our school environment. Any response will:

- include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate)
- treat all children involved as being at potential risk - while the alleged perpetrator(s) may pose a significant risk of harm to other children, they may also have considerable unmet needs and be at risk of harm themselves. schools should ensure a safeguarding response is in place for both the victim-survivor(s), and alleged perpetrator(s), and additional sanctioning work may be required for the latter
- ensure all victim-survivors are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim-survivor should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim-survivor ever be made to feel ashamed for making a report or their experience minimised.

21.1. Any response will consider:

- that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider socio-cultural 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 local community, and the child's/children's online presence. Consider what changes may need to be made to these contexts to address the child's/children's needs and to mitigate risk
- the potential complexity of child-on-child 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, and
- 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.

21.2. Reports of sexual violence and sexual harassment are often complex and require difficult decisions to be made, on a case-by-case basis, with the DSL taking the lead role, supported by external agencies such as children's social care or the police. Some situations are statutorily clear: a child under the age of 13 can never consent to sexual activity as the age of consent is 16, sexual intercourse without consent is rape (as defined in law), creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves.

21.3. If a child speaks to a member of staff about sexual violence or sexual harassment that they have witnessed or are a part of, the member of staff will listen to the child and use open language that demonstrates understanding rather than judgement. For further details please see the procedure set out in our Safeguarding Children - Child Protection Policy. A factual record should be made of the concern or allegation, taking the victim-survivor seriously, but no attempt at this stage should be made to investigate the circumstances, unless a child is in immediate danger or is at risk of harm, in which case, an immediate referral will be made to children's social care and/or the police. Additionally, in cases where there is a report of rape, assault by penetration or sexual assault this will be passed to the police and children's social care by the DSL.

21.4. The DSL will follow the advice for practitioners in 'What to do if you're worried a child is being abused' and will follow through the outcomes of the discussion and, if so advised by Children Social Care, will make a formal referral if the incident meets the referral threshold set by the Local Safeguarding Children Partnership ensuring effective information sharing with any agencies or other professionals involved. The DSL will ensure good record keeping of related conversations, meetings and communications. A copy of the discussions and outcomes will be kept securely. Faculty and staff should not assume that someone else is dealing with the incident and should discuss concerns with the DSL. Where an incident between two students takes place away from the school, or they attend different schools, the school's duties and procedures remain the same.

21.5. Where possible, we will aim to manage reports of sexual violence and sexual harassment with two members of staff present (one being the DSL). Where a report includes an online element, we will follow the Searching, Screening and Confiscation advice (for schools) and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. Faculty/staff must avoid viewing or forwarding any illegal images of a child.

21.6. School faculty and staff are trained as per Part One (and Annex B where applicable) of the September 2024 KCSIE on how to manage a disclosure and are aware of anonymity in cases where an allegation is progressing through the criminal justice system. TASIS England will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, including considering the impact of social media and which staff need to know about the report. TASIS England will make a risk assessment in cases of a report of sexual violence, considering the victim-survivor, alleged perpetrator and other children at the school. Risk assessments will be kept under review. In cases of sexual violence, a professional risk assessment by external specialists may be required and should be used to inform the school's own risk assessment. TASIS England will carefully consider any report of sexual violence or harassment and act in the best interests of the child. TASIS England will also carefully consider when to inform the alleged abuser, and this may be discussed with relevant agencies. Faculty/staff may be expected to participate in any Early Help assessment, child protection enquiry, strategy discussion or other outcome, following a referral to children's social care.

22. Confidentiality

Staff taking a report will not promise confidentiality as it is very likely that it will be in the best interests of the victim-survivor to seek advice and guidance from others to provide support and engage appropriate agencies, however these will only be agencies who are required to support the children involved and/or be involved in any investigation.

22.1. The victim-survivor may ask the school not to tell anyone about the sexual violence or sexual harassment. If the victim-survivor does not give consent to share information, staff may still lawfully share it, for example, to protect children from harm and to promote the welfare of children. The DSL will balance the victim-survivor's wishes against their duty to protect the victim-survivor and other children. The DSL (or Deputy) will consider the following regarding the sharing of information:

- Parents or carers should normally be informed (unless this would put the victim-survivor at greater risk)

- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the police and/or children's social care
- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police.

22.2. Where the DSL decides to go ahead and make a referral to children's social care and/or a report to the police against the victim-survivor's wishes, this will be handled carefully and sensitively. The reasons will be explained to the victim-survivor and appropriate specialist support will be offered. This could be from a School Counselor or a Houseparent.

23. Action following a report of sexual violence and/or sexual harassment

TASIS England will carefully consider any report of sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school. Our DSL is most likely to have a complete safeguarding picture and as such will advise on the school's initial response. Important considerations will include:

- the wishes of the victim-survivor in terms of how they want to proceed
- victim-survivors being given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered, which need to be balanced with the school's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children, for example, whether an alleged perpetrator is significantly older, more mature or more confident, or whether the victim-survivor has a disability or learning difficulty
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- whether there are ongoing risks to the victim-survivor, other children, adult students or school staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

23.1. We will act in the best interests of the child, following the safeguarding principles set out in KCSIE 2024, giving immediate consideration to how best to support and protect the victim-survivor, the alleged perpetrator(s) and any other children involved/impacted.

24. Managing the report

All cases of sexual violence and sexual harassment will be considered on a case-by-case basis, including when to inform the alleged perpetrator(s). If applicable, this will often take place once guidance has been sought by children's social care and/or the police. Whatever the response, it is under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

24.1. Dependent on the disclosure of report, the school will consider (in some cases in collaboration with children's social care) the following courses of action:

- **Manage internally:** In some cases of sexual harassment, for example, one-off incidents, the school may take the view that the children concerned are not in need of Early Help or require referrals to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour and bullying policies and by providing pastoral support. Moreover, if a pattern of behaviour between peers emerges which is inappropriate or problematic, the school will engage and seek advice from external specialists for support.
- **Undertake/contribute to an inter-agency Early Help assessment:** In line with the above point, the school may decide that the children involved do not require referral to statutory services but may benefit from Early Help. Early Help means providing support as soon as a problem emerges, at any point in a child's life. Providing Early Help is more effective in promoting the welfare of children than reacting later. Early Help can be particularly useful to

address non-violent HSB and may prevent escalation of sexual violence. These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services.

- **Refer child/children to children's social care:** Where a child has been harmed, is at risk of harm, or is in immediate danger, the school will make a referral to children's social care. At the point of referral to children's social care, the school will generally inform parents or carers, unless there are compelling reasons not to that are in the best interests of the child. Any such decision should be made with the support of children's social care. If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services. The DSL will work alongside the relevant social worker, ensuring the best possible package of coordinated support is implemented for the victim-survivor and, where appropriate, the alleged perpetrator(s) and any other children that require support. The school will not wait for the outcome of any investigation from children's social care before protecting the victim-survivor and other children in the school and may involve other ages (including Early Help) immediately.
- **Reporting to the police:** in cases where rape, assault by penetration or sexual assault is reported, this will ordinarily be reported to the police (in parallel to children's social care). 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 produced sexual imagery does not involve any aggravating factors. All concerns/allegations will be assessed on a case-by-case basis and will consider the wider context. However, TASIS England will not wait for the outcome of a police investigation before protecting the students involved and other children in the school. The DSL will work closely with the police to ensure that the school's actions do not jeopardise the police investigation. If a child is convicted or cautioned, the school will update the risk assessment and consider suitable action through the school's Behaviour Management, Discipline and Sanctions Policy, available on the school website.

24.2. It is important for TASIS England to ensure the students involved in the allegation remain protected, especially from bullying or harassment. Where no further action is taken, or a child found not guilty, TASIS England will continue to support the students involved.

25. How students involved in sexual violence and sexual harassment will be supported

All students involved, are treated as being 'at risk', a thorough risk-assessment and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) will be carried out with a view to ensuring the safety of all students. For example, whether the accused student should be removed from school for a period, or removal of the alleged abuser from classes and any transport etc. which is shared with the student who has been abused, whether sleeping arrangements should be changed for boarders, whether contact with certain individuals should be prevented or supervised, the availability of counselling such as referring students to an external safeguarding agency such as ChildLine and NSPCC and the adequacy of arrangements for listening to children etc.

25.1. Additionally:

- Support for the victim-survivor will consider their age, the nature of the allegations and the risk of further abuse.
- An alleged perpetrator may have unmet needs themselves.
- The needs and wishes of the victim-survivor will be paramount, and they will be able to continue their normal routine as far as possible.
- TASIS England must ensure that all parties are safeguarded, providing students with education and support as necessary.
- TASIS England may discipline the alleged abuser, including while the police or children's social care investigation is ongoing, although they will liaise with these bodies to assist in determining any sanctions.
- TASIS England will be clear about when their actions are to support the victim-survivor or perpetrator, and when their actions are to discipline the perpetrator for their conduct.
- A student against whom an allegation of abuse has been made may be excluded from the school for a fixed period during the investigation. The school's Behaviour Management, Discipline and Sanctions Policy will apply.
- All information related to reports and assessments will be managed and protected in accordance with our Data Protection and Confidentiality and Information Sharing policies and UK GDPR.

25.2. If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of children's social care, the student's parents are informed as soon as possible, and that the student is supported during the interview by an appropriate adult. Normally, the DSL will try to discuss any concerns about a child's welfare with the family and where possible seek their agreement to making a referral to C-SPA if necessary. However, in accordance with DfE guidance, this will only be done when this will not place the child at increased risk. The child's views will also be taken into account. Where there are doubts or reservations about involving the child's family, the DSL should clarify with C-SPA or the police whether, and if so when and by whom, the parents should be told about the referral. This is important in cases where the police may need to conduct a criminal investigation. Where appropriate, the DSL should help the parents understand that a referral is in the interests of the child and that the school will be involved in the enquiry or police investigation. In the case of students whose parents are abroad, the student's Education Guardian will be requested to provide support to the student and to accommodate him/her if it is necessary to exclude him/her during the investigation.

25.3. Where neither children's social care nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures. In situations where the school considers a safeguarding risk is present, a risk assessment will be prepared along with a preventative supervision plan. The plan should be monitored, and a date set for a follow-up evaluation with everyone concerned.

25.4. When a student is in need of *urgent* medical attention and there is suspicion of abuse, an ambulance should be called. If the response from the emergency services states that the school should take the child to hospital then the DSL, (or a Deputy or other appropriate member of staff) with an escort, should take the child to the Accident and Emergency Unit at the nearest hospital. They should notify C-SPA and seek advice about what action the C-SPA or the police will take and how the parents will be informed. Usually, parents would be informed that their child requires urgent hospital attention. If the suspected abuse is sexual then the medical examination should be delayed until the C-SPA and the police can liaise with the hospital, unless the needs of the child are such that medical attention is the priority. There must always be a responsible adult with the child, whether from the school, C-SPA or the police, if the parents are not present. All unnecessary delays should be eradicated and inaction at any level can and should be challenged.

25.5. TASIS England is committed to ensuring victim-survivors feel safe and supported through:

- Identifying a named trusted adult to offer ongoing support
- Offering access to internal counselling and external agencies, where appropriate
- Ensuring victim-survivors can continue their education in a safe environment, with alternative provisions implemented with their agreement
- Conducting regular reviews of risk assessments to maintain safety from the potential of further harassment or harm.

26. Additional safeguards and support for the alleged perpetrator(s) and children who display harmful sexual behaviour

A child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school. We will work with professionals as required to understand why a child may have abused a peer. It is important to remember that, as a child, any alleged perpetrator(s) is entitled to, deserving of, and should be provided with, a high level of support to help them understand and overcome the reasons for their behaviour and help protect other children by limiting the likelihood of them abusing again, if the abuse is proven.

26.1. The school will consider the age and the developmental stage of the alleged perpetrator(s) and nature and frequency of the allegations when considering sanctions and support, as any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

26.2. Support (and sanctions) should be considered on a case-by-case basis. An alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive

practices and or materials. We will work with, as appropriate, children's social care, specialist sexual violence services and the police to provide the best course of support for any alleged perpetrator(s).

27. On-going Support

We recognise that victim-survivors may not disclose the whole situation immediately, they may be more comfortable providing information gradually. We will work with victim-survivors and perpetrators to ensure that a dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the school will ask the victim-survivor if they would find it helpful to have a designated trusted adult (for example, their advisor or the DSL) to talk to about their needs. The choice of any such adult will be the victim-survivor's (as far as is reasonably possible). A victim-survivor of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While the school aims to avoid any action that would have the effect of isolating the victim-survivor, in particular from supportive peer groups, there may be times when the victim-survivor finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This would only be because the victim-survivor wants to, not because it makes it easier to manage the situation. If required, the school will provide a physical space for victim-survivors to withdraw. It may be necessary for the school to maintain arrangements to protect and support the victim-survivor for a long time and we will work with children's social care and other agencies as required.

27.1. TASIS England will do everything it reasonably can to protect the victim-survivor from bullying and harassment as a result of any report the victim-survivor has made.

27.2. Whilst we aim to provide the victim-survivor with all the necessary support to remain in school, if the trauma results in the victim-survivor being unable to do this, alternative provision or a move to another school will be considered to enable them to continue to receive suitable education. This would only be at the request of the victim-survivor (and following discussion with their parents or carers). If the victim-survivor were to move to another educational institution (for any reason), we will ensure that they are made aware of any ongoing support needs. Our DSL will take the lead responsibility to ensure this happens (and will discuss with the victim-survivor and, where appropriate, their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

28. Unsubstantiated, unfounded, false or malicious reports

As set out in KCSIE 2024 all concerns, discussions, and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

28.1. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

28.2. If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

29. Working with parents and carers

TASIS England will, in most cases, engage with the parents of the students involved and will consider carefully what information they provide. It is good practice for TASIS England to meet the students' parents with the students present to discuss what safeguarding arrangements are being put in place, such as moving classes or accommodation arrangements. This will in the main be carried out by the DSL. We will provide parents with support organisations who can help with their own trauma after a report for their child.

30. Supporting witnesses of sexual violence or sexual harassment

Consideration should be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required. Following a report of sexual violence or sexual harassment, it is likely that some students will take 'sides'. The school will do all we can to ensure both the victim-survivor and alleged perpetrator, and any witnesses, are not being bullied or harassed, including during transition times such as between lessons or during transport to and from the school. Social media is very likely to play a

significant role in the fall out from any incident or alleged incident. There is the potential for contact between victim-survivor and alleged perpetrator and a very high likelihood that friends from either side could well harass the victim-survivor or alleged perpetrator online. When writing a risk-assessment for the students involved in an incident of sexual violence or sexual harassment, the school will consider any additional potential support needed to keep all our students safe.

31. Disciplinary action

The school will consider whether disciplinary action may be appropriate for any child/children involved – any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour, (b) to demonstrate to the child/children and others that child-on-child abuse can never be tolerated, and (c) to ensure the safety and wellbeing of other children. However, these considerations must be balanced against the child's/children's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action, the school will always consider its duty to safeguard all children from harm, the underlying reasons for a child's behaviour, any unmet needs, or harm or abuse suffered by the child, the risk that the child may pose to other children, and the severity of the child-on-child abuse and the causes of it.

31.1. 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, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. 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. Disciplinary interventions alone are rarely able to solve issues of child-on-child 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.

32. On-going proactive work to a contextual whole-school approach

The school's response to concerns/allegations of sexual violence and sexual harassment is part of on-going proactive work by the school to embed best practice and take a contextual whole-school approach to such abuse. As such the school's response can become part of its wider prevention work. This response may include the school asking itself a series of questions about the context in which an incident of child-on-child 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 child-on-child abuse has been challenged etc.) and how can the school strengthen these
- how (if at all) did the school's physical environment contribute to the abuse, and how can the school address this going forwards, for example by improving the school's safety, security and supervision
- 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 forwards
- 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
- 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 child-on-child abuse, including by way of the school's PSHEE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work
- are there any lessons to be learnt about the way in which the school engages with parents to address child-on-child 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, and
- were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the school.

Appendix 1

Nudes or Semi-Nudes – also known as youth produced sexual imagery or sexting: The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. The DfE provides searching, screening and confiscation advice for schools. The UK Council for Child Internet Safety (UKCIS) Education Group with the DfE has published guidance for schools - Sharing nudes and semi- nudes: advice for education settings working with children and young people. However, this online technology has also given children themselves the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal. Youth produced sexual imagery refers to both images and videos where a person is under the age of 18:

- creates and shares sexual imagery of themselves with a peer under the age of 18, or sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the TASIS England Safeguarding Children - Child Protection policy and UKCIS guidance Sharing nudes and semi- nudes: advice for education settings working with children and young people should be reported to the DSL. Cases where nude or semi-nude imagery of children under 18 has been shared by adults and where nude or semi-nude imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly. If any member of faculty or staff suspects they may find an indecent image of a child, the memberof staff should never intentionally view the image, and must never copy, print, share, store or save such images. When an incident might involve an indecent image of a child and/or video, the member of staff should confiscate the device, avoid looking at the device and refer the incident to the Designated Safeguarding Lead (or deputy) as the most appropriate person to advise on the school's response.

Handling such reports or concerns can be especially complicated and schools should follow the principles set out in Keeping Children Safe in Education 2024. All members of staff (including non-teaching staff) are aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. This will be covered within staff training and within the school's child protection policy.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process, unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process, if there is concern a young person has been harmed or is at risk of harm, a referral should be made to children's social care or the police as appropriate. Immediate referral at the initial review stage should be made to children's social care/police if:

- the incident involves an adult
- there is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs)
- what you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent
- the imagery involves sexual acts
- the imagery involves anyone aged 12 or under, and
- there is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above applies then the DSL will use their professional judgement to assess the risk to students involved and may decide, with input from the Head of School, to respond to the incident without escalation to Surrey Children's Social Care or the police. In applying judgement, the DSL will consider if:

- there is a significant age difference between the sender/receiver
- there is any coercion or encouragement beyond the sender/receiver
- the imagery was shared and received with the knowledge of the child in the imagery
- the child is more vulnerable than usual i.e., at risk
- there is a significant impact on the children involved
- the image is of a severe or extreme nature
- the child involved understands consent

- the situation is isolated or if the image has been more widely distributed
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e., difficult home circumstances, and
- the children have been involved in incidents relating to youth produced imagery before.

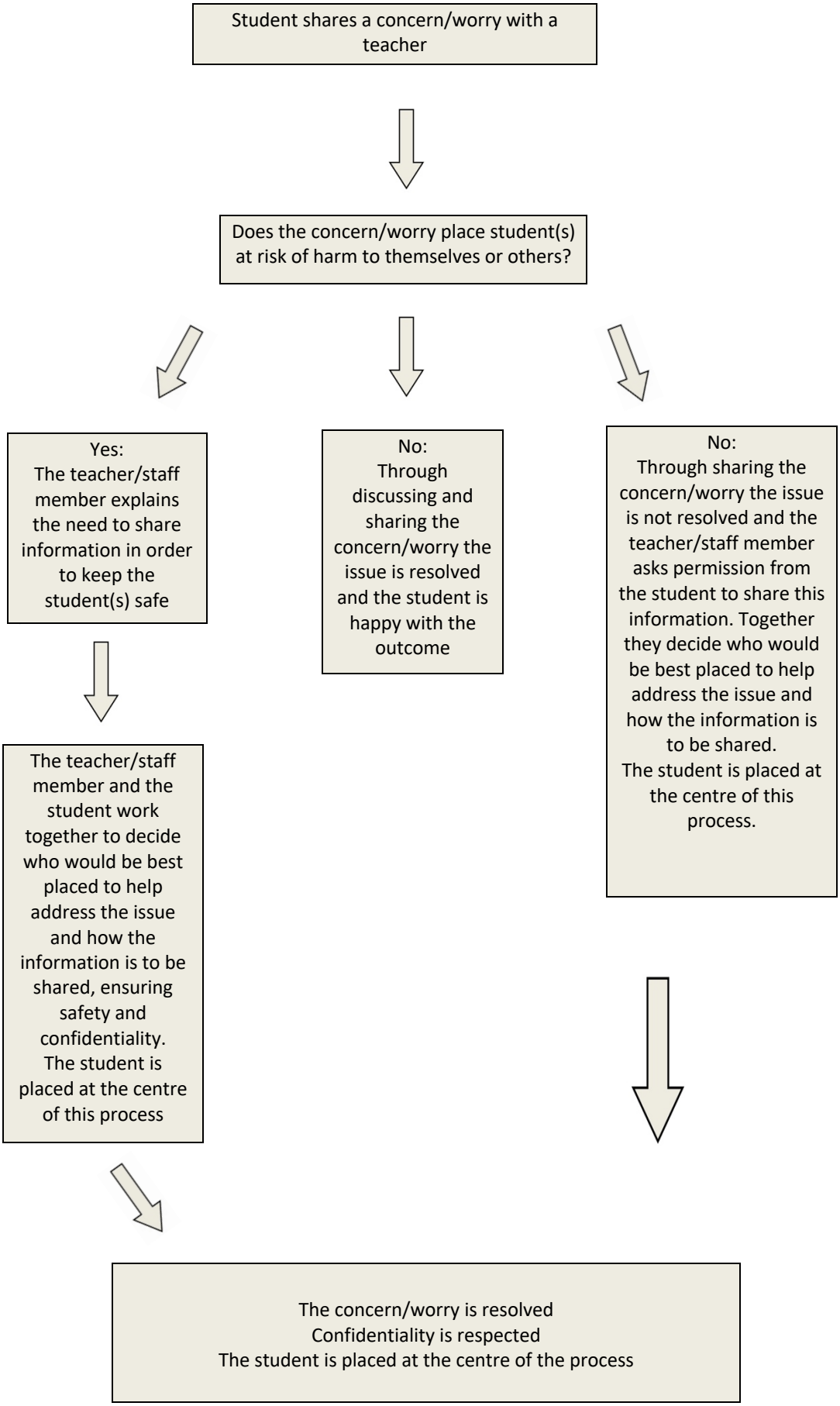
If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the school. The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

Removal of sexual images/videos: If the incident involves sexual images or videos that have been made and circulated online, the victim-survivor can be supported to get the images removed through the Internet Watch Foundation (IWF). The IWF will make an assessment of whether the image is illegal in line with UK Law. If the image is assessed to be illegal, it will be removed and added to the IWF's Image Hash list.

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 produced 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.

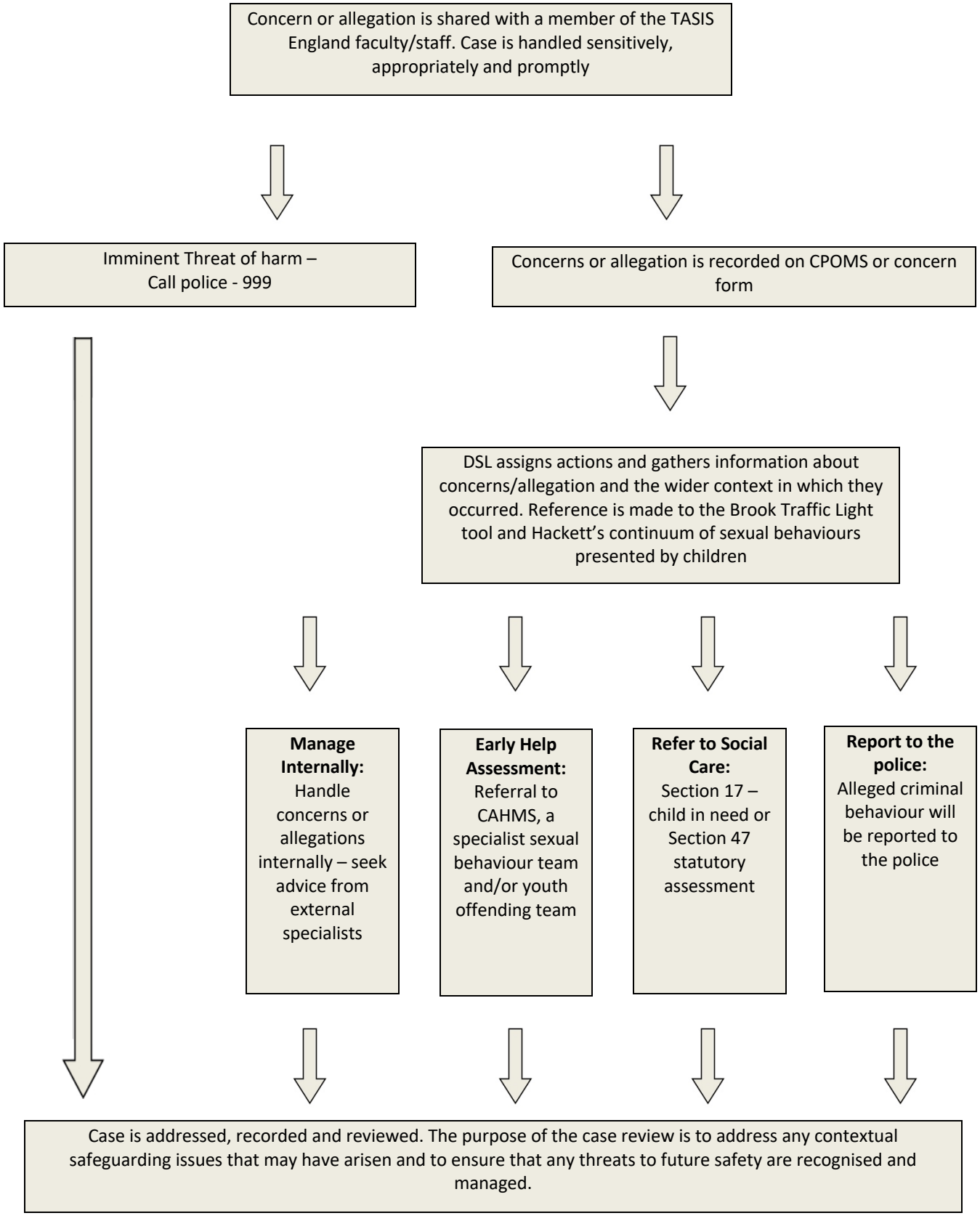
Appendix 2

Student Concern/Worry Procedure for All Issues – Inclusive of Sexual Violence or Sexual Harassment Inc Child-on-Child Abuse



Appendix 3

Sexual Violence and/or Sexual Harassment Protocol



Appendix 4

Example HSB/Child-on-Child Abuse Monitoring Form

SH/SV and C on C ABUSE/HSB LOG 2022/23

First Name	Surname	CPOMS Case No.	Date of Incident	Period Quarter	Victim / Perpetrator	Abuse Category	Age	Grade	Gender	Day Student	Boarding Student	LRC	EAL	Response from schoo

Lower School | Middle School | Upper School

Appendix 5

Risk Assessment for TASIS England School		
Risk Assessment for: Child-on-child Abuse (including Sexual Violence and Sexual Harassment)	**Approved by: Head of School and School Wide Safeguarding Team**	**RA Date: January 2025**
Carried out by: Jason Tait		**RA Review Date: January 2026**

What are the Hazards?	**Level of risk**			**Who might be harmed and how?**	**Control Measures**			
	Low	**Med**	**High**		**Action to be taken to lower the risk.**	**Action by whom?**	**Action by when?**	**Level of risk reduced to low**
Bullying				Students through being the victim-survivor of bullying behaviour by peers, both in person and online. Such actions may also take place outside of school.	- TASIS England will have a clear and accessible anti-bullying policy that is reviewed on an annual basis. - TASIS England will have anti-bullying coordinators in every section of the school. These people will be responsible for ensuring that TASIS England follows the procedures and ethos outlined in the anti-bullying policy. - The mission and ethos of the school and Spiritual, Moral, Social and Cultural (SMSC) development actively promotes an appreciation for diversity and respect for all cultures and people. - TASIS England, through PSHE and the homeroom, advisory and boarding program, will communicate to students that we do not tolerate such behaviour	TASIS England Senior Leadership Team (SLT), teachers, staff, parents and students	Ongoing through-out the school year	

					and what to do if you are either the victim of bullying and/or witness such acts. - TASIS England will be known as a listening school and educate all faculty and staff in how to develop trusting relationships with students, thus encouraging the sharing of information and disclosure about instances of bullying. - Students will be required to read and sign our acceptable use policy, which clearly states that TASIS England will not tolerate any form of cyberbullying. This information will be shared with parents. - Student leaders, across the school, will be trained as to how they should look to address all forms of bullying.			
Discrimination, as defined in the 2010 Equalities Act: Age Disability Gender reassignment Marriage or civil partnership Pregnancy and maternity				Students, through discriminatory behaviours of peers and/or adults, inclusive of online behaviours	- Single Equalities and Race Equality policies have been written and shared with the community, evidencing our zero-tolerance stance on discrimination - TASIS England provides training for faculty, staff and students in relation to being able to identify discrimination and how it should be countered - DSL has created specific reporting categories based on discrimination in CPOMS and on the LMS behaviour management reporting systems	TASIS England SLT, teachers, staff, parents, and students	Ongoing through-out the school year	

Race Religion or belief Sex Sexual orientation					- All members of the community can share concerns with the DSL via: dsl@tasisengland.org - Students can share concerns via the Student Voice Page, as well as Advisors, House Parent/Deputy House Parent, Tutor and Teacher - Develop curricular links across the school that highlight and reflect issues around discrimination and how they should be addressed			
Youth produced sexual imagery (sharing nudes/semi-nudes) This includes manipulation images or images created with artificial intelligence (deepfakes, catfishing)				- Both the victim-survivor and perpetrator of sharing youth produced sexual imagery. - Students, who have received youth produced sexual imagery but were neither the victim-survivor nor perpetrator of such actions. - Such actions, including creation and/or distribution could have legal implications.	- TASIS England will have a clear and accessible Child Protection and Safeguarding Policy and Online Safety Policy that is reviewed on an annual basis. - All students, as part of the PSHE program, will receive explicit education about Youth produced sexual imagery and the dangers that this type of behaviour can have for students, including the legal ramifications of such actions. - Faculty and staff will receive training as to how to identify issues of Youth produced sexual imagery and how to address such issues if a student should disclose such concerns. - Parents, via the school's online safety website, parent workshops and regular updates will be informed as to how to keep their child safe online and how to support them should they be	TASIS England SLT, teachers, staff, parents and students	Ongoing through-out the school year	

					involved in any aspect of Youth produced sexual imagery. - TASIS Behaviour Management Policy states a clear zero tolerance approach for such behaviours and outlines the school's response to such issues.			
Sexual Harassment				- Students, who are both the victim-survivor and perpetrator of such actions, including possible legal ramifications of sexual harassment.	- TASIS England will have a clear and accessible Child Protection and Safeguarding Policy and Online Safety Policy that is reviewed on an annual basis. - DSL and DDSLs will consult the Brook Traffic light tool to assess the severity of the case and to guide our response. - All students, through the PSHE program, will be taught about healthy relationships and how to recognise and address unhealthy relationships. - The mission, ethos and SMSC development of the school will promote healthy and respectful relationships. - Students will be involved in the development of a referral process that encourages students to share concerns and worries about such issues. This referral process will be readily accessible to students, via the LMS and posters in classrooms and boarding houses. - Faculty and staff will be trained to recognise and address such instances of sexual harassment and to promote and role model healthy relationships. - TASIS Behaviour Management Policy states a clear zero	TASIS England SLT, teachers, staff, parents and students	Ongoing through-out the school year	

					tolerance approach for such behaviours and outlines the school's response to such issues.			
Banter				Students, who are both the victim-survivor and perpetrator of such actions	- TASIS England will have a clear and accessible child protection and safeguarding policy that is reviewed on an annual basis. - All school leaders, faculty/staff and student leaders will be expected to challenge all instances of: the telling of sexual stories; lewd comments; sexual remarks about clothes and appearance; calling someone sexualised names; verbal or gestural sexual comments or taunting - All students, through the PSHE program, will be taught about healthy relationships and how to recognise and address unhealthy relationships. - The mission, ethos and SMSC development of the school will promote healthy and respectful relationships. - Students will be involved in the development of a referral process that encourages students to share concerns and worries about such issues. This referral process will be readily accessible to students, via the LMS and posters in classrooms and boarding houses. - Faculty and staff will be trained to recognise and address such instances of banter and to promote and role model healthy relationships.	TASIS England SLT, teachers, staff, parents and students	Ongoing throughout the school year	

					- TASIS Behaviour Management Policy states a clear zero tolerance approach for such behaviours and outlines the school's response to such issues.			
Sexual violence – rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)				Students, who are both the victim-survivor and perpetrator of such actions, including possible legal ramifications of sexual violence.	- TASIS England will have a clear and accessible Child Protection and Safeguarding Policy that is reviewed on an annual basis. - DSL and DDSLs will consult the Hackett Harmful Sexual Behaviour framework to assess the severity of the case and to guide our response. - All students, through the PSHE program, will be taught about healthy relationships and how to recognise and address unhealthy relationships. This program will also educate students on the impact this type of behaviour can have for students, including the legal ramifications of such actions. - The mission, ethos and SMSC development of the school will promote healthy and respectful relationships. - Students will be involved in the development of a referral process that encourages students to share concerns and worries about such issues. This referral process will be readily accessible to students, via the LMS and posters in classrooms and boarding houses. - Faculty and staff will be trained to recognise and address such instances of sexual violence and will know and understand the	TASIS England SLT, teachers, staff, parents and students	Ongoing through-out the school year	

					referral process for addressing such issues, in an empathetic and sensitive manner. - TASIS Behaviour Management Policy states a clear zero tolerance approach for such behaviours and outlines the school's response to such issues.			