EATON HOUSE SCHOOLS

CHILD-ON-CHILD ABUSE POLICY

Author:	Mani Giri (Compliance Manager)
Responsibility:	Mrs Roosha Sue (Head, EHTM Nursery) Mrs Claire Fildes (Head, EHTM Girls') Mr David Wingfield (Head, EHTM Pre-Prep) Mr Ross Montague (Head, EHB) Mrs Sarah Segrave (Head of Prep, EHTM and Principal, Eaton House Schools)
Updated:	September 2024
Current version no:	V1
Approved by the Governing Body:	30th September 2024
Next review:	September 2025

Contents

Introduction 3
Policy for Child-on-child Abuse 4
What is Child-on-child Abuse 5
What is Contextual Safeguarding 5
When does behaviour become problematic or abusive? 5
Sexual Behaviours – The Brook Traffic Light Tool 6
Other Behaviours 9
Are some children particularly vulnerable to abusing or being abused by their peers? 9
What to do if you suspect or have a concern about child-on-child abuse? 11
Responding to Concerns or Allegations of child-on-child abuse 12
Referral Pathways 14
Whole School Approach 19
Disciplinary Action 20
Information sharing, data protection and record keeping 21

Introduction

The Principal, Senior Management team and all staff which includes volunteers and Peripatetic staff at Eaton House Schools are committed to the prevention, early identification, and appropriate management of child-on-child abuse both within and outside of School.

In particular, we believe that in order to protect children, the School should be aware of the nature and level of risk to which the pupils are or may be exposed to and put in place a clear and comprehensive strategy tailored to their specific safeguarding context. To take a whole-School community Contextual Safeguarding approach to preventing and responding to child-on-child abuse.

It is important to regard this policy as a preventative measure. We do not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents of it.

We believe that to tackle child-on-child abuse proactively, it is necessary to focus on all four of the following areas:

(i) systems and structures

(ii) prevention

(iii) identification

(iv) response /intervention

Recognising national and increasing concern about this issue and implementing this policy to mitigate harmful attitudes and child-on-child abuse in the School setting.

Parents should inform the School if their child is feeling unsafe due to the behaviour of any of their peers to ensure that appropriate and prompt action is taken in response.

Policy for Child-on-child Abuse

This policy relates to, and should be read alongside, the Schools Safeguarding and Child Protection Policy and any other relevant policies including, but not limited to, bullying including cyber-bullying, online safety, IT use, data protection, pupil behaviour, discipline and exclusions.

The policy sets out our strategy for improving, prevention, and identifying and appropriately managing child-on-child abuse. Designated Safeguarding Leads and senior management have consulted to ensure a well-rounded policy has been written.

This policy applies to all senior management team and all staff working in the School. The policy is reviewed annually, and updated as may be required, to ensure that the policy continually addresses the risks to which pupils may be exposed to.

It is important to recognise that abuse is abuse and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up'.

To be compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education

The terms 'victim' and/or 'perpetrator' should be avoided. The School takes a safeguarding approach to all individuals involved in concerns or allegations about child-on-child abuse, including those who are alleged to have been abused, and those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter. Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers. Children who abuse should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others.

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

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

What is Child-on-child Abuse

For these purposes, child-on-child abuse is any form of physical, sexual, emotional and verbal abuse, exercised between children, and within children's relationships, both intimate and non-intimate, friendships and wider peer associations. Child-on-child abuse can take various forms, including but not limited to; serious bullying including cyberbullying, relationship abuse, child sexual exploitation, harmful sexual behaviour, and/or prejudice-based violence including, but not limited to, gender-based violence. Examples of online child-on-child abuse would include sexting, online abuse, child-on-child grooming, the distribution of youth involved sexualised content, and harassment.

What is Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School. All staff but in particular the designated safeguarding lead (or deputy) should consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding. Assessments of children should consider whether wider environmental factors are present in a child's life that is a threat to their safety and/or welfare. It is important that staff and the designated safeguarding lead provides as much information as possible as part of the referral process. This will allow Children's social care assessment to consider all the available evidence and the full context of abuse.

When does behaviour become problematic or abusive?

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

Sexual Behaviours – The Brook Traffic Light Tool

Behaviours: age 0 - 5 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

GREEN BEHAVIOURS

- Holding or playing with own genitals
- Attempting to touch or curiosity about other children's genitals
- Attempting to touch or curiosity about breasts, bottoms or genitals of adults
- Games e.g. mummies and daddies, doctors and nurses
- Enjoying nakedness
- Interest in body parts and what they do
- Curiosity about the differences between boys and girls

AMBER BEHAVIOURS

- Preoccupation with adult sexual behaviour
- Pulling other children's pants down/skirts up/trousers down against their will
- Talking about sex using adult slang
- Preoccupation with touching the genitals of other people
- Following others into toilets or changing rooms to look at them or touch them
- Talking about sexual activities seen on TV/online

RED BEHAVIOURS

- Persistently touching the genitals of other children
- Persistent attempts to touch the genitals of adults
- Simulation of sexual activity in play
- Sexual behaviour between young children involving penetration with objects
- Forcing other children to engage in sexual play

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or development ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercing, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Behaviours: age 5 – 9 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

GREEN BEHAVIOURS

- Feeling and touching own genitals
- Curiosity about other children's genitals
- Curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- Sense of privacy about bodies
- Telling stories or asking questions using swear and slang words for parts of the body

AMBER BEHAVIOURS

- Questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- Sexual bullying face to face or through texts or online messaging
- Engaging in mutual masturbation
- Persistent sexual images and ideas in talk, play and art
- Use of adult slang language to discuss sex

RED BEHAVIOURS

- Frequent masturbation in front of others
- Sexual behaviour engaging significantly younger or less able children
- Forcing other children to take part in sexual activities
- Simulation or oral or penetration sex
- Sourcing pornographic material online

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or development ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercing, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Behaviours: age 9 – 13 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

GREEN BEHAVIOURS

- Solitary masturbation
- Use of sexual language including swear and slang words
- Having girl/boyfriends who are of the same, opposite or any gender
- Interest in popular culture, e.g. fashion, music, media, online games, chatting online
- Need of privacy
- Consensual kissing, hugging, holding hands with peer

AMBER BEHAVIOURS

- Uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- Verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT(lesbian, gay, bisexual, transgender) targeted bullying
- Exhibitionism, e.g. flashing or mooning
- Giving out contact details online
- Viewing pornographic material
- Worrying about being pregnant or having STIs

RED BEHAVIOURS

- Exposing genitals or masturbating in public
- Distributing naked or sexually provocative images of self or others
- Sexually explicit talk with younger children
- Sexual harassment
- Arranging to meet with an online acquaintance in secret
- Genital injury to self or others
- Forcing other children of same age, younger or less able to take part in sexual activities
- Sexual activity e.g. oral sex or intercourse
- Presence of sexually transmitted infection (STI)

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or development ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercing, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Other Behaviours

When dealing with other alleged behaviour such as emotional and/or physical abuse staff should assess the alleged behaviour and decide how to respond.

This could include the following:

- Is the behaviour socially acceptable?
- Does it involve a single incident or has it occurred over a period of time?
- Is it socially acceptable within the peer group?
- Is it problematic and concerning?
- Does it involve any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional or intellectual vulnerability?
- Does it involve an element of coercion or pre-planning?
- Does it involve a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power?
- Does it involve a misuse of power?

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

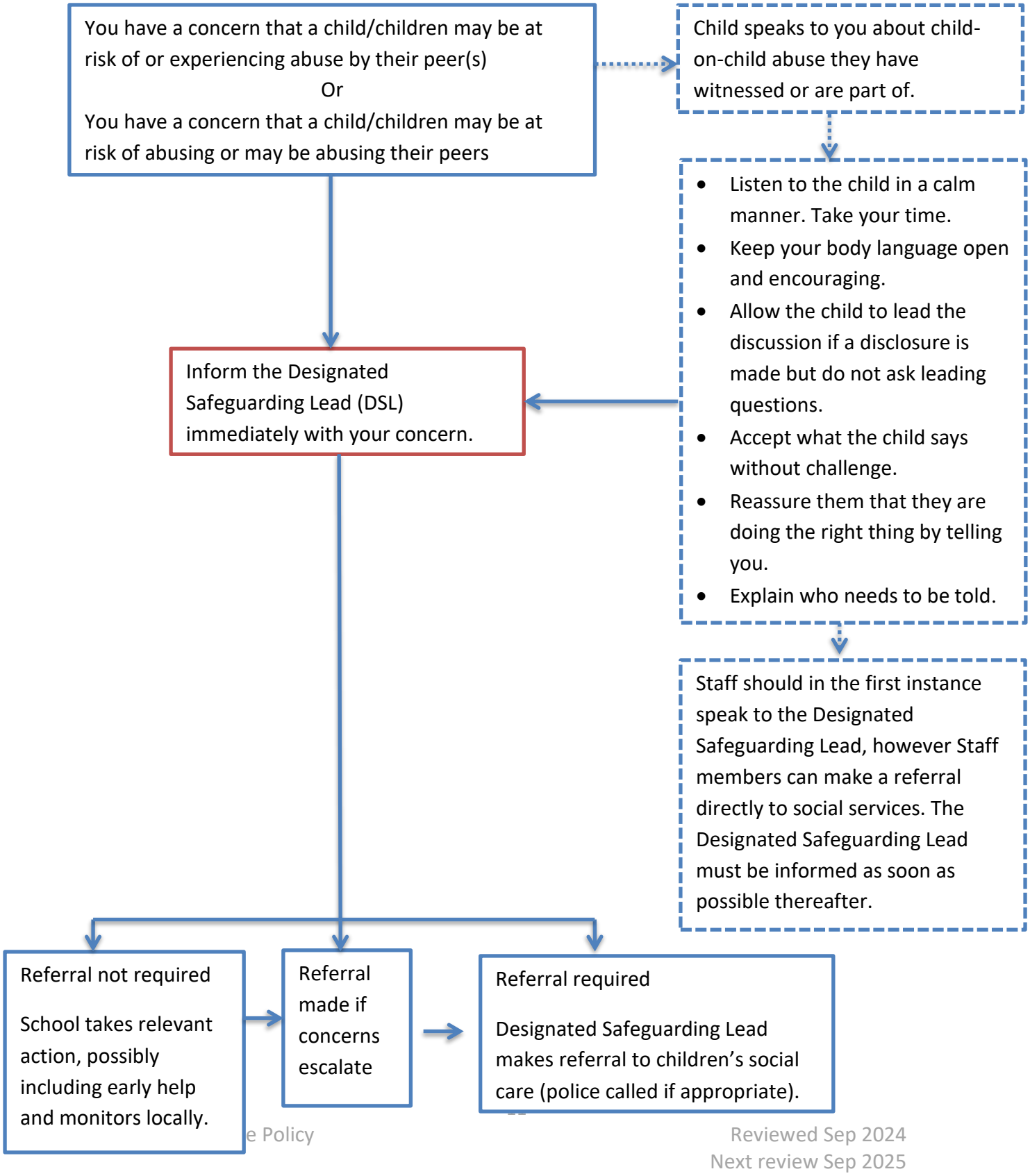
Any child can be vulnerable to child-on-child abuse therefore staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. Peer group dynamics can play an important role in determining a child's vulnerability to such abuse.

Child-on-child abuse may affect boys differently from girls and barriers to disclosure may also be different.

Children with Special Educational Needs and/or Disabilities are more likely to be abused than their peers without SEND. Also, additional barriers may exist when recognising abuse in children with SEND. This can be through assumptions made that indicator of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration. Also, there is the potential for children with SEND not to show any outwardly signs that they are being abused. Communication barriers and difficulties and overcoming these barriers will present a barrier in themselves.

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

What to do if you suspect or have a concern about child-on-child abuse?



Responding to Concerns or Allegations of child-on-child abuse

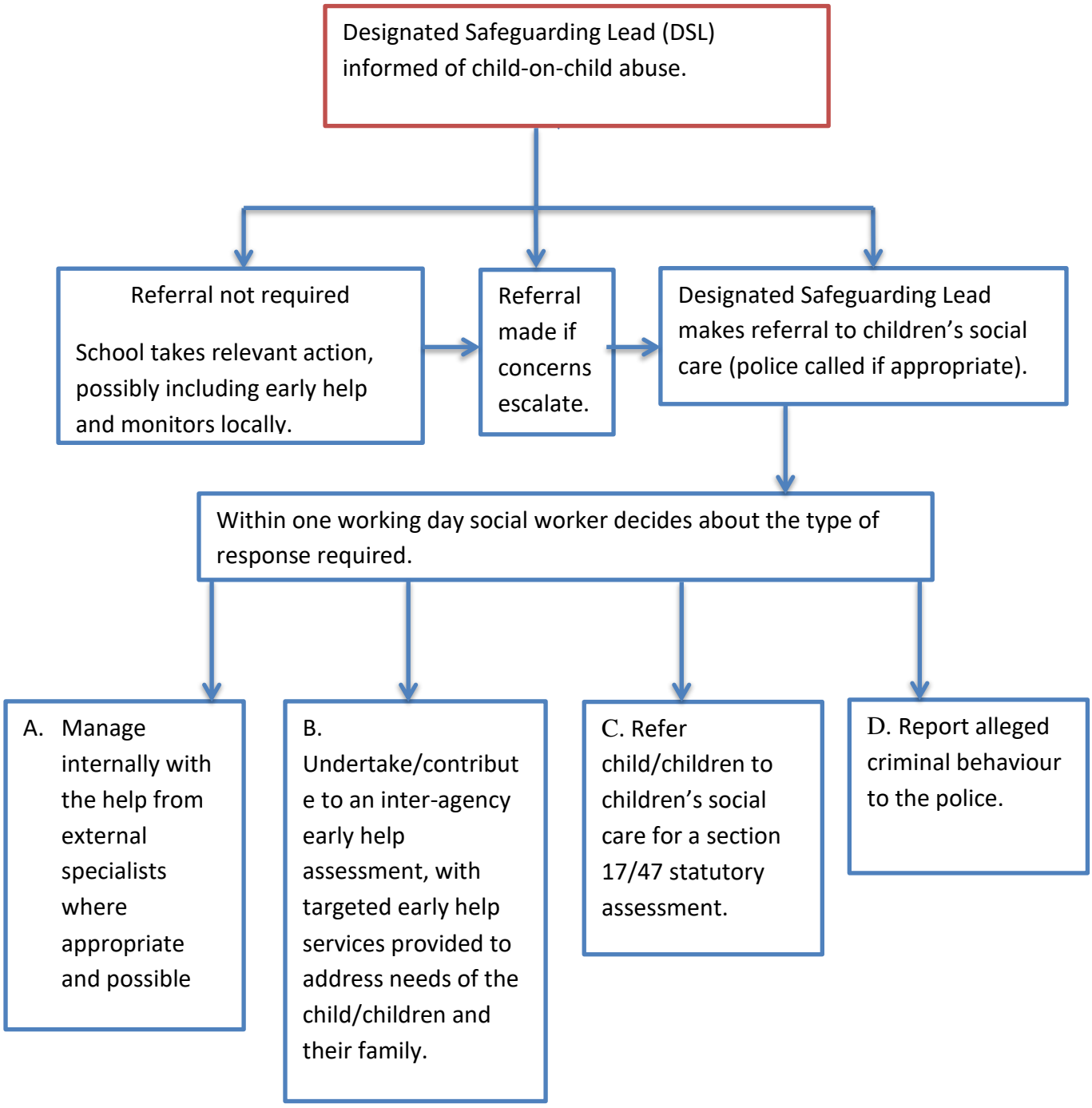
It is important that all concerns and allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which child-on-child abuse is responded to can have a significant impact on our School environment.

Any responses by the Designated Safeguarding Leads (Deputy Heads and Head Teachers) should:

- Include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred, as appropriate, depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation.
- Take any immediate steps to ensure the safety of the child/children affected.
- Treat all children involved as being at potential risk. While the child allegedly responsible for the abuse may pose a significant risk of harm to the other children, the child may also have considerable unmet needs and be at risk of harm themselves. Eaton House Schools ensures that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter.
- Both pupils will be interviewed if appropriate as well as anyone else involved by the pastoral team which will include the Head Teacher and/or Deputy Head. All information must be recorded and kept confidential and secure by the Designated Safeguarding Lead. Parents/guardians of both parties will be informed and invited to the School to discuss the matter. Their support should be sought.
- Take into account that the abuse may indicate wider safeguarding concerns for any of the children involved, consider and address the effect of wider sociocultural contexts such as the child's/children's peer group, within and outside the School, family, School environment and the child's/children's online presence. Consider what changes may need to be made to these contexts to address the child/children's needs and to mitigate risk.
- Consider 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.
- Consider views of the child/children affected. The Designated Safeguarding Lead and Head Teacher should discuss the proposed action with the child/children's parents unless considered unsafe to do so for e.g. where a referral needs to be made immediately.
- In borderline cases the Designated Safeguarding Lead may wish to consult with the children's social care and/or MASH on a no name basis, where possible, to determine the most

appropriate response. **Please note the social services for where the child lives must be contacted.**

Referral Pathways



SAFEGUARDING

Kensington & Chelsea and Westminster / Hammersmith & Fulham

Worried about a child or young person?

WESTMINSTER
accesstochildrensservices@westminster.gov.uk
020 7641 4000 / Out of hours 020 7641 6000

KENSINGTON & CHELSEA
socialservices@rbkc.gov.uk
020 7361 3013

HAMMERSMITH & FULHAM
020 8753 6610 / Out of hours 020 8748 8588

YES
Children Social Care

Children and families who are at high risk of harm based on the London Continuum of Need will receive intervention and ongoing support.

UNSURE
MASH

Where the level of risk is not clear, MASH will gather further information to determine next steps for support.

NO
Early Help Hub

Children and families who are a lower risk of harm based on the London Continuum of Need will receive early intervention support through the Early Help Hub.

LADO

Allegations against Staff & Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against, or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

Westminster
LADO@westminster.gov.uk
020 7641 7668

Kensington and Chelsea
kclado.enquiries@rbkc.gov.uk
020 7361 3013

Hammersmith and Fulham
lado@ibhf.gov.uk
020 8753 5125

Other Key Contacts

Prevent Duty Hammersmith & Fulham and Kensington and Chelsea:
020 8753 5727 prevent@lbhf.gov.uk / prevent3@rbkc.gov.uk

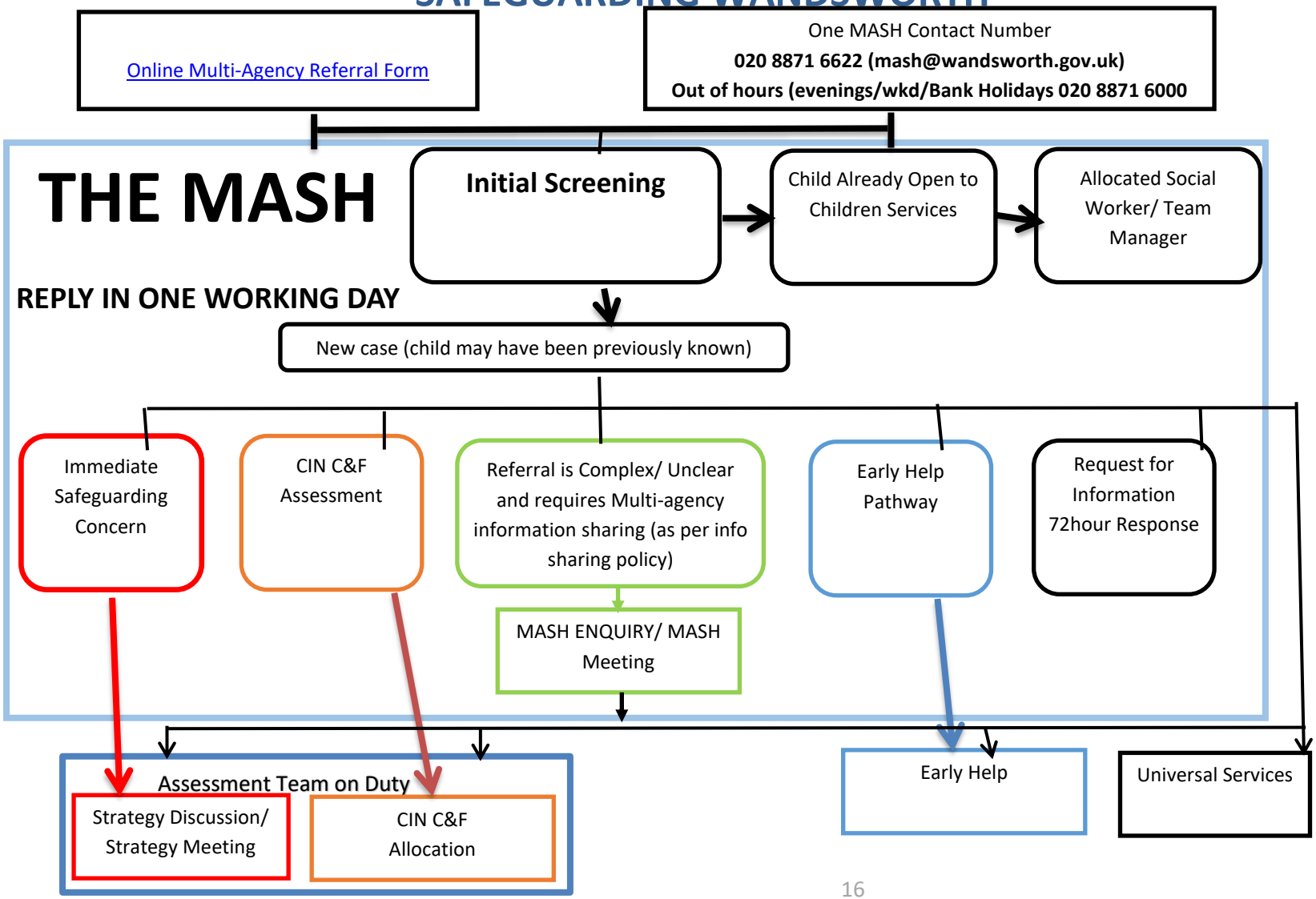
Prevent Wesminster:
020 7641 5071 prevent@westminster.gov.uk

LSCP Team
07739 315388

Ofsted:
0300 123 1231 enquiries@ofsted.gov.uk

If a child is at immediate risk, call 999

SAFEGUARDING WANDSWORTH



LADO

Allegations against Staff & Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against, or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

LADO@richmondandwandsworth.gov.uk

mash@wandsworth.gov.uk

020 8871 7440

If a child is at immediate risk, call 999

Other Key Contacts

Prevent Duty:	020 8871 6622	
Wandsworth Safeguarding Children Partnership:	020 8871 7401	wscp@wandsworth.gov.uk
Ofsted:	0300 123 1231	enquiries@ofsted.gov.uk

SAFEGUARDING LAMBETH

First Response Team

If you think a child is at risk of being abused or neglected please contact Lambeth Children's Social Care.

helpandprotection@lambeth.gov.uk **020 7926 5555**

YES

Children Social Care

Children and families who are at high risk of harm based on the London Continuum of Need will receive intervention and ongoing support from the Referral and Assessment Team and Children in Need Teams.

UNSURE

MASH

Where the level of risk is not clear, MASH will gather further information to determine next steps for support.

NO

Early Help Hub

Children and families who are a lower risk of harm based on the London Continuum of Need will receive early intervention support through the Early Help Hub.

The Hub will undertake the initial contact, arrange the first TAC and determine community and targeted services which are best for the family.

LADO

Allegations against Staff & Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against, or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

LADO@lambeth.gov.uk
020 7926 4679 or 077 2082 8700

All referrals must also be e-mailed to the LADO.

Other Key Contacts

Prevent Duty contact the Intergrated Referral Hub: 020 7926 5555 helpandprotection@lambeth.gov.uk

If a child is at immediate risk, call 999

An online tool Report child abuse to local council directs you to the relevant local children's social care contact number.

Please note you must contact the local children's social care in which the child lives.

Full local procedures are available from the Local Safeguarding Children Board at www.londonscb.gov.uk

Whole School Approach

All staff are responsible in recognising and reporting child-on-child abuse. All staff support the on-going welfare of pupils, addressing underlying mental health needs and providing support.

There is the importance of promoting positive values and encouraging a culture of tolerance and respect amongst all members of the School community. Creating an environment where pupils have safe, positive and healthy relationships in the School community. Allowing children to have a sense of belonging and for them to be able to share their concerns openly, in a non-judgmental environment, and be listened to.

Child-on-child abuse cases should always be responded to promptly and appropriately. Creating a culture and understanding that all forms of child-on-child abuse, no matter how "low level" they may appear are taken seriously.

Ensuring that all child-on-child abuse issues are fed back to the Schools Designated Safeguarding Lead so that they can spot and address any concerning trends and identify pupils who may be in need of additional support and challenging the attitudes that underlie such abuse. This is done by weekly staff meetings at which all concerns about pupils are discussed. However, there should not be a delay in reporting concerns of child-on-child abuse to the Designated Safeguarding Lead immediately.

Children are educated about the nature and prevalence of child-on-child abuse, positive, responsible and safe use of social media (age appropriate) and the unequivocal facts about consent, via PSHE and the wider curriculum.

Pupils are told what to do if they witness or experience such abuse and 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 told the Schools approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse.

Engaging parents and encouraging them to inform the School if they feel there is a concern.

Disciplinary Action

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

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

- Ensure that the child/children do take responsibility for and realises the seriousness of their behaviour
- Demonstrate to the child/children and others that child-on-child abuse can never be tolerated
- Ensure the safety and wellbeing of other children

However, these considerations must be balanced against any police investigation, the child's/children's own potential unmet needs, and any action or intervention planned regarding safeguarding concerns. Eaton House Schools will always consider its duty to safeguard all children in its care from harm, the underlying reasons for a child's behaviour, any unmet needs, 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.

In the event of a managed move, consideration must be given to sharing information with the receiving School regarding the child-on-child abuse to allow best protection of children in the new School.

Eaton House Schools understands that 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 forward.

Information sharing, data protection and record keeping

When responding to concerns or allegations of child-on-child abuse, Eaton House Schools will consider carefully, in consultation with children's social care, the police and other relevant agencies how to share information about the concerns or allegations with the pupils affected, their parents, staff and other pupils and individuals.

Information must be recorded that is necessary for the School and other relevant agencies to respond to the concerns or allegations and safeguard everyone involved.

It is important to keep a record of the legal purpose for sharing the information with any third party, including relevant authorities and ensure that the thirds party has agreed to handle the information securely and to only use it for the agreed legal purpose.

Eaton House Schools will be mindful to act in accordance with its safeguarding and data protection duties, including those set out in Working Together to Safeguard Children and the Government advice on information Sharing.