


JFS Policies – Safeguarding and Child Protection Addendum – Child-on-Child Sexual Abuse and Harassment – January 2026

Headteacher	Chair of Governing Board
	
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Aim
 This policy is to be read in conjunction with the ‘Safeguarding and Child Protection’ policy. It specifically sets out how the school will deal with any incidents of sexual violence or harassment.

Key Information

Sexual violence and sexual harassment can occur:

- Between two children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and are not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

Responding to a Report

It is important to note that children may not find it easy to tell staff about their abuse verbally. They can show signs or act in ways that they hope adults will notice and react to. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

It is essential that all victims are reassured that they are being taken seriously. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously.

Reporting should be carried out in line with school policy as set out in the main safeguarding document.

Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment will consider:

- the victim, especially their protection and support.
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

At all times, the school will be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

Threshold for Contacting Police and Children's Services

When responding to incidents of child-on-child sexual abuse or harassment, the school will assess the severity of the behaviour and determine whether a referral to the police or children's services is required. A referral will be made if:

- The incident involves rape, assault by penetration, or sexual assault as defined in the Sexual Offences Act 2003.
- The alleged perpetrator poses a continuing risk to others.
- There is evidence of coercion, blackmail, grooming, or an imbalance of power.
- The victim is particularly vulnerable due to age, disability, or other safeguarding concerns.
- The behaviour is part of a pattern of repeated incidents of sexual violence or harassment.

In cases where the above threshold is met, the Designated Safeguarding Lead (DSL) will immediately contact the police and/or children's services for further assessment and intervention.

Referral to Safer Schools Officer

If the threshold for police or children's services intervention is not met, the school may still take action by referring the matter to the safer schools officer for an educational discussion or intervention. This may be appropriate in cases such as:

- A one-off incident of inappropriate sexual language or low-level sexualised behaviour.
- Consensual but inappropriate conduct between students that requires reinforcement of boundaries and respect.
- Situations where the behaviour does not meet the criminal threshold but is still concerning and requires intervention to prevent escalation.

The safer schools officer may engage with the students involved through structured conversations, workshops, or restorative interventions aimed at addressing behaviours and reinforcing appropriate conduct.

School Behaviour Policy

Regardless of whether external agencies are involved, all incidents of child-on-child sexual abuse or harassment will be managed in accordance with the school's behaviour policy. This includes:

- Applying appropriate sanctions in line with the severity of the incident.
- Providing pastoral support to both the victim and the perpetrator.
- Implementing risk assessments and safety plans where necessary.
- Ensuring that all students understand the seriousness of sexual harassment and the importance of respectful behaviour.

All incidents, decisions, and actions taken will be recorded in line with safeguarding and behaviour management protocols, ensuring that appropriate support and interventions are in place for all students involved.

Sharing of Nudes and Semi-Nudes (Youth-Produced Sexual Imagery)

If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'youth-produced sexual imagery'), they must report it to the DSL immediately. This includes Pseudo-images – these are computer-manipulated and/or generated images that otherwise appear to be photograph or video. This includes images that are generated by AI.

Staff Responsibilities

Staff must not:

- View, copy, print, share, store, or save the imagery themselves, or ask a pupil to share or download it. (If they have already viewed the imagery by accident, they must report this to the DSL immediately.)
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) involved, or their parents/carers unless explicitly directed to do so by the DSL.
- Say or do anything to blame or shame any young people involved.

Staff should explain that they need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

DSL Response and Referral Decisions

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s).
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed).
- Whether there is a need to seize phones of any students where there is suspected/known YPSI. This will be locked away in the school safe pending guidance from the police as to whether they will collect the phone or it can be returned to the student/parent.
- If a phone is seized, parents will be contacted to make arrangements for travel home.
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the pupils involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved).

. An immediate referral to the police and/or children's social care will be made if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (e.g., due to special educational needs or disabilities).
- The imagery depicts sexual acts that are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts, and any pupil in the images or videos is under 13.
- The young person is presenting as suicidal or self-harming as a result of the incident.

If none of the above apply, the DSL, in consultation with the Headteacher and other relevant staff, may decide to respond to the incident without involving the police or children's social care. This will be done under the guidance of our Safer School's Officer and/or Children's Services. This decision will be made and recorded in line with safeguarding procedures, ensuring that appropriate support and interventions are in place.

Educational Intervention with the Safer Schools Officer

If the threshold is not met for police or children's services involvement, the DSL may refer the matter to the Safer Schools Officer for an educational discussion. This intervention aims to educate students about the risks and consequences of sharing nudes and semi-nudes, reinforcing appropriate online behaviour and ensuring they

understand the legal implications. Discussions may cover:

- The impact of sharing images on mental health and personal reputation.
- How images can be misused and distributed beyond their intended recipients.
- The potential criminal consequences of sharing explicit images of minors.
- Strategies for resisting peer pressure and protecting personal boundaries online.

These discussions may be conducted in small group settings or on a one-to-one basis, depending on the nature of the incident.

Support for All Students Involved

Support for the Victim

- The student will be offered appropriate emotional and pastoral support.
- The DSL will assess the risk of further harm and implement any necessary protective measures.
- Referral to external agencies, such as counselling or mental health services, will be considered if needed.

Support for the Perpetrator

- Where appropriate, students responsible for sharing images will receive education and interventions to prevent recurrence.
- If the behaviour was a result of coercion or peer pressure, additional safeguarding measures will be considered.
- The school will provide support to help the student understand the seriousness of their actions and ensure they do not reoffend.

School Behaviour Policy and Sanctions

Regardless of whether external agencies are involved, all incidents of child-on-child sexual abuse or harassment will be managed in accordance with the school's behaviour policy. This includes:

- Applying appropriate sanctions in line with the severity of the incident.
- Providing pastoral support to both the victim and the perpetrator.
- Implementing risk assessments and safety plans where necessary.
- Ensuring that all students understand the seriousness of sexual harassment and the importance of respectful behaviour.

Record Keeping

- All incidents, decisions, and actions taken will be recorded in line with safeguarding and behaviour management protocols.
- The DSL will ensure that appropriate documentation is maintained and securely stored.
- Follow-up actions, including interventions and support provided, will be reviewed regularly to assess effectiveness.

This policy is in line with national safeguarding guidance, including *Keeping Children Safe in Education* and the UK Council for Internet Safety's guidance on responding to incidents of youth-produced sexual imagery.

Creating a Supportive Environment in School

We recognise the importance of taking proactive action and of creating a supportive environment where victims feel confident in reporting incidents. To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images, taking a zero-tolerance approach to sexual harassment and

sexual violence.

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems.
- Ensure staff reassure victims that they are being taken seriously.
- Support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSE and PSHC and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

In addition to this we have annual assemblies for all year groups by Safer School's Officer, Everyone's Invited, Online Safety by ECP to educate on the law around the topics mentioned in this policy.

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The receipt of such images.

Students are reminded regularly about this topic so they are aware of the processes the school will follow in the event of an incident.