

Child On Child Harmful Sexual Behaviour Policy

Clarity Independent School

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Clarity Independent School is committed to safeguarding...

"Our school is committed to our whole-school approach to safeguarding, which ensures that keeping children safe is at the heart of everything we do, and underpins all systems, processes and policies...We promote an environment where children and young people feel empowered to raise concerns and report incidents and we work hard in partnership with pupils, parents and caregivers to keep children safe."

Clarity Safeguarding Policy September 2025

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1. Introduction

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It ranges from behaviour which is beyond that which would be developmentally expected (age-appropriate), to inappropriate, problematic, coercive, exploitative, abusive and violent behaviour. It can occur also 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.

Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. This is known as 'Harmful Sexual Behaviour' (HSB). Our school recognises that children are vulnerable to and also capable of harmful sexual behaviour.

At Clarity Independent school, our staff have regular refresher training to ensure that they:

- consistently maintain a **zero-tolerance** approach to sexual violence and sexual harassment, know that it is never acceptable, and will not be tolerated. Ensure that it is **never** passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Know that failure to challenge such behaviour, and to teach children to understand why it should be challenged, 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.
- recognise, acknowledge, and understand the scale of harassment and abuse and know that even if there are no reports it does not mean it is not happening, it could happen here; it may be the case that it is just not being reported.
- are aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys; but that boys can also be victims and girls can be perpetrators.
- are aware that children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers
- challenge physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts, as well as 'upskirting'. Staff are aware that dismissing or tolerating such behaviours risks normalising them. Staff are also aware that all such behaviours must be reported to the DSL/DDSL using the school's Safeguarding reporting system (CPOMs).

We take any allegation of abuse or coercion between our children seriously and follow our child protection procedures if a report of harmful sexual behaviour is made. This may include seeking advice and support from other agencies as appropriate. Decisions are made taking into account the age and developmental stages of any child involved. We also consider any other factors as appropriate and balance this with our duty and responsibilities to protect all children.



Within this policy we use the following widely used and recognised terms in places: ‘victim(s)’ and ‘alleged perpetrator(s)’. We recognise that a child who has reported abuse may not consider themselves to be a victim and may not want to be described in this way. We also recognise that a child who is reported to have displayed abusive behaviour may not consider that they have done so, and that if abusive behaviour has occurred it will have been impactful to them too. We are conscious of the language we use when managing reported abuse, especially when speaking with our children, and will consider this on a case-by-case basis. We are prepared to use any term which our children are most comfortable with.

In Essex, all professionals must work in accordance with the [SET Procedures](#). Our school also works in accordance with the following legislation and guidance (*this is not an exhaustive list*):

- [Keeping Children Safe in Education \(DfE 2025\)](#)
- [Working Together to Safeguard Children DfE \(2023\)](#)
- Education Act (2002)
- [Essex Effective Support](#) (2021)
- [Counter-Terrorism and Security Act \(HMG, 2015\)](#)
- [Serious Crime Act 2015](#) (Home Office, 2015)
- Children and Social Work Act (2017)
- [Children Missing Education - statutory guidance for local authorities \(DfE, 2016\)](#)
- Sexual Offences Act (2003)
- Education (Pupil Registration) Regulations 2006
- [Information sharing advice for safeguarding practitioners \(HMG, 2018\)](#)
- [Data Protection Act \(2018\)](#)
- [What to do if you're worried a child is being abused](#) (HMG, 2015)
- Children Act (1989)
- Children Act (2004)
- [Preventing and Tackling Bullying \(DfE, 2017\)](#)
- Female Genital Mutilation Act 2003 (S. 74 - Serious Crime Act 2015)
- [Preventing youth violence and gang involvement \(Home Office, 2015\)](#)
- [Criminal Exploitation of children and vulnerable adult - county lines guidance \(Home Office, 2018\)](#)
- [Teaching on-line safety in schools \(DfE, 2019\)](#)
- [Education Access Team CME / Home Education policy and practice \(ECC, 2018\)](#)
- [Behaviour in Schools \(DfE 2024\)](#)
- [Suspension and permanent exclusion in schools, academies and PRUs, including pupil movement \(DfE 2022\)](#)
- [Searching, screening and confiscation \(DfE 2022\)](#) – updated 2023
- [Let's talk: reducing the risk of suicide \(ESCB 2022\)](#)
- [Understanding and Supporting Behaviour - good practice for schools \(ECC, 2023\)](#)
- [Filtering and Monitoring Standards \(DfE\)](#)
- Sexual Offences Act 2003
- [Stop it Now](#) – Preventing Harmful Sexual Behaviour in Children guide for parents and carers
- [Beyond Referrals](#) – Contextual Safeguarding toolkit for schools
- [What to do if a child is involved in AI generated images](#) – Internet Watch Foundation



2. What Harmful Sexual Behaviour means

The Department for Education (DfE) publishes statutory guidance for all education settings: Keeping Children Safe in Education. Part 5 of this guidance sets out how schools should manage reports of child-on-child sexual violence and harassment (harmful sexual behaviour).

Sexual violence

This means sexual offences under the Sexual Offences Act 2003 as described below:

- rape;
- assault by penetration;
- sexual assault (which includes inappropriate or unwanted sexualised touching); and
- causing someone to engage in sexual activity without consent.

Sexual harassment

This means unwanted conduct of a sexual nature, which 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.

Sexual harassment can include (though this is not an exhaustive list):

- sexual comments (telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names)
- sexual 'jokes' or taunting;
- physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes;
- displaying pictures, photos, or drawings of a sexual nature; and
- upskirting, which typically involves taking a picture or video under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, and / or to cause the victim humiliation, distress, or alarm (this is a criminal offence).

Online sexual harassment

This can be a single event, 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/or videos (NB: this is a criminal offence if the photographs are of those aged under 18);
- sharing of unwanted explicit content;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation, coercion, and threats; and
- coercing others into sharing images of themselves or performing acts they are not comfortable with online.

We recognise that children can experience harmful sexual behaviour in various settings. This includes at school, at home (or at another home), in public places, and online. At school, issues can occur in places which are supervised and unsupervised. For example, abuse may occur in toilets, corridors, changing areas,



common rooms, outside spaces such as the playground and sports facilities, and when children are travelling home.

We also recognise that Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

3. Preventative Work

Today's children and young people are growing up in an increasingly complex world and living their lives seamlessly on and offline. This presents many positive and exciting opportunities, but also challenges and risks. In this environment, children and young people need to know how to be safe and healthy, and how to manage their academic, personal, and social lives in a positive way. In school we follow the statutory guidance:

[Relationships and sex education \(RSE\) and health education](#) (DfE, 2019, Updated Sep 2021))

Children

We use relationships, sex, and health education to help our children understand, in an age-appropriate way, what harmful sexual behaviour is, including by children. We teach them the knowledge they need to recognise and report abuse, including sexual abuse. We also teach them about the importance of making sensible decisions to stay safe (including online), whilst being clear that if a child is abused, it is never their fault and victim blaming is always wrong. These subjects complement our delivery of health education, including physical and mental health and wellbeing, and are part of our whole-setting approach to safeguarding our children.

We help our children to develop the skills to understand:

- the characteristics of positive, respectful and healthy relationships, including friendships (and how to recognise unhealthy relationships);
- boundaries, privacy, and consent;
- what constitutes sexual harassment and sexual violence and why these are always unacceptable; and
- the concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, and rape.

We understand that our children may not always feel able to talk to adults about child-on-child sexual abuse. To help them, we will encourage them to share their thoughts and opinions, respond to their concerns, and respect and listen to them. We want our children to feel confident that any concerns they raise will be responded to appropriately.

Please refer to our RSE (Relationships and Sex Education) Policy for further information about how we help our children to develop the skills to understand the complex nature of healthy and unhealthy relationships.

Parents and carers

It is important that parents and carers understand what is meant by harmful sexual behaviour and that they reinforce key messages from school at home. We work in partnership with parents and carers to support our children and want to help them to keep their child/ren safe. Parents and carers should understand:



- the nature of harmful sexual behaviour;
- the effects of harmful sexual behaviour on children;
- the likely indicators that such behaviour may be taking place; and
- what to do if it is suspected that child-on-child sexual abuse has occurred.

Further information to support parents and carers in relation to harmful sexual behaviour is available online, including on the [NSPCC](#) and [Lucy Faithfull Foundation](#) websites. The Lucy Faithfull Foundation in collaboration with the Home Office, has developed '[Shore Space](#)', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

[StopItNow – Preventing harmful sexual behaviour in children](#) provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

Staff

Our staff undertake annual safeguarding training to ensure they are aware of the signs of abuse and how to recognise them. Staff also receive regular updates and refreshers on a number of safeguarding issues, including harmful sexual behaviour. The training ensures that our staff know what to do if they receive a report that harmful sexual behaviour may have occurred, including how to support our children.

[Beyond Referrals | Contextual Safeguarding](#) provides a school self-assessment toolkit and guidance for addressing HSB in schools.

4. Managing Reports of Harmful Sexual Behaviour (HSB)

Children

How we manage reports of harmful sexual behaviour made by our children is very important. The wellbeing of our children is always central to our approach. Any child reporting a concern will be treated respectfully. We always reassure them that they are being taken seriously and that they will be supported and kept safe. No child will ever be made to feel that they are creating a problem by reporting harmful sexual behaviour or to feel ashamed. Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously.

Our staff will follow these safeguarding practice principles:

- wherever possible, managing any report of harmful sexual behaviour with two members of staff present. This will usually include our Designated Safeguarding Lead (or a Deputy Designated Safeguarding Lead);



- listening carefully to a child in a non-judgemental way and ensuring we are clear about how the report will be progressed. We will ensure our children know they can speak to our staff again if they wish to provide more information, or for any other reason;
- where a report includes an online element (including AI generated imagery), we work to the government advice in [Searching screening and confiscation](#) and [UKCIS Sharing nudes and semi nudes advice for education settings working with children and young people](#). We will never view an illegal image of a child as part of our response to a report of harmful sexual behaviour, unless absolutely necessary in exceptional circumstances. We will never forward an illegal image of a child; and
- working in partnership with other agencies (including statutory partners) to ensure that concerns are appropriately managed. Where a child already has Children's Social Care involvement, such as a Looked After Child, a Child In Need or a child with a Child Protection Plan, we will inform the child's Social Worker and work in partnership with them as appropriate.

Confidentiality and information sharing

Our staff will never guarantee confidentiality to anyone (including parents/carers or children) about a safeguarding concern, nor promise to keep a secret. In accordance with statutory requirements, where there is a child protection concern, this must be reported to our Designated Safeguarding Lead (or Deputy Designated Safeguarding Lead) and may require further referral to and subsequent investigation by appropriate authorities. Parents and carers will normally be informed about any report of abuse, unless we consider that this may place the victim at greater risk.

In some cases, we may need to make a request for support to Children's Social Care and/or a report to the police where this is against a child's wishes. In such cases, we will explain our reasons for doing so and support the child appropriately.

Anonymity

We will do all we reasonably can to protect the anonymity of any children involved in any report of harmful sexual behaviour. This means we will consider carefully, based on the nature of the report, which staff should know about it, and which staff should know about any support that will be put in place for the children involved.

We are aware of the potential impact of social media, which can facilitate the spreading of rumour and expose a victim's identity, making things more challenging for them. Where the use of social media becomes a factor and is affecting our capacity to manage the report and support our children, we will address this, linking with agencies as appropriate.

Recording

It is essential that we record all reports about harmful sexual behaviour within our school, as with any other child protection concern, in line with our Safeguarding and Child Protection Policy which you can find on our website. Any member of staff receiving a report of harmful sexual behaviour or noticing signs or indicators of this will record it as soon as possible, noting what was said or seen (if appropriate, using a body map to

record), giving the date, time, and location. The record will then be presented to the Designated Safeguarding Lead (or Deputy Designated Safeguarding Lead), who will decide on appropriate action and record this accordingly.

If a child is at immediate risk of harm, our staff will first speak with the Designated Safeguarding Lead (or Deputy Designated Safeguarding Lead) as soon as possible, and deal with recording as soon as possible afterwards.

Investigation

Our Designated Safeguarding Lead will be responsible for leading investigations, and for liaising with other agencies as appropriate, for example Children's Social Care and the police. They will also be the main point of contact for parents and carers. The Designated Safeguarding Lead will ensure there are accurate records for each stage of the investigation and that any supporting information is included in our Child Protection files.

Risk Assessment

We will usually complete a risk assessment following a report of harmful sexual behaviour. Our risk assessment will include the following considerations:

- the victim, and any actions that may be appropriate to protect them;
- whether there may have been other victims;
- the alleged perpetrator(s);
- the time and location of the incident(s), and any action required to make the location(s) safer; and all other children (and, if appropriate, our staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Our risk assessment will be recorded and reviewed regularly to ensure it remains relevant and fit for purpose. Wherever possible, the victim, alleged perpetrator, and their parents and carers will be invited to contribute to the completion and subsequent reviews of the risk assessment.

At all times, we will be actively considering any risks that are identified through our risk assessment, and its ongoing review, to our children. We will put measures in place to protect our children accordingly.

Considerations

The safety of our children is paramount. We will use a proportionate approach, based on the principle that harmful sexual behaviour is not acceptable and will not be tolerated. Our approach will help us to ensure that all children are protected and supported appropriately.

The following contextual aspects and principles will be considered to guide us:

- the wishes of the victim in terms of how they want to proceed;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed;
- the ages and emotional developmental stages of all children involved;
- any power imbalance between the children involved;



- whether the alleged incident is a one-off or part of a sustained pattern of abuse;
- acknowledgement that sexual violence and sexual harassment can take place within intimate personal relationships between children;
- consideration to the importance of understanding intra-familial harms and any necessary support for siblings following incidents;
- consideration of any ongoing risks to the victim, other children, or school staff;
- consideration of any other related issues and wider context.

All concerns will be considered carefully on a case-by-case basis. Our actions will not be judgemental about the guilt of the alleged perpetrator and will always be taken in the interests of all children involved, balanced with our duty and responsibilities to protect our other children.

Safeguarding and supporting a victim

We will assess what short-term and long-term support a child may need to help them manage the immediate aftermath of an incident, and to recover from what they have experienced. A child's existing support network will be central to this work; we will work with other partners as appropriate and in accordance with a child's wishes and, wherever appropriate, in discussion with parents and carers.

We will consider what is necessary to support a victim straightaway. For example, making adaptations to their timetable and in-school support and taking steps to protect them from attention or peer pressure they may experience due to making a report. We will also ensure there is a regular review of arrangements, to be confident they meet the needs of all children involved.

It may be necessary to make requests for support to mental health and wellbeing services or for therapeutic intervention. We may also need to liaise with other agencies to remove inappropriate material from the Internet, such as the [Internet Watch Foundation](#).

Safeguarding and supporting an alleged perpetrator

We have a duty of care to all children and will protect and support children who have displayed harmful sexual behaviour. We will do this through considering a child's needs, any risks to their safety and what multi-agency responses are needed to support them and their family.

Some children may not realise they have behaved abusively. We will not use language that may make them feel judged or criminalised and ensure that any intervention will be at the least intrusive level required to effectively address the behaviour.

We will carefully consider when to inform an alleged perpetrator(s) about a report of harmful sexual behaviour made against them. Where a request for support is going to be made to Children's Social Care or the police, then, as a general principle, our Designated Safeguarding Lead will speak to those agencies to discuss next steps, including how the alleged perpetrator(s) will be informed of the allegations. This will not prevent the school from taking immediate action to safeguard children, where required.

We will consider appropriate educational consequences using our behaviour policy, and work with a child and their support network to consider the measures and teaching opportunities that may help to address their behaviour.

Informing parents and carers

In line with our child protection procedures, we inform parents or carers about reports of sexual abuse unless to do so may place a child at additional risk. We will seek advice from other safeguarding partners in individual cases. In circumstances where parents or carers have not been informed, we will ensure that we support a child in any decision we take. This is likely to be with the support of Children's Social Care and any appropriate specialist agencies.

Ongoing support for our children

Children who have experienced harmful sexual behaviour display a wide range of responses. Children may show clear signs of trauma, physical and emotional responses, or no overt signs at all. Children who display harmful sexual behaviour may also respond in these or in other ways. We will remain vigilant and show sensitivity to the needs of all our children, for example, about attendance in lessons.

We will consider what ongoing support our children may need, and tailor this on a case-by-case basis. For example, the support provided for children following a single incident of a lewd remark may be different from that following a report of sexual assault. Examples are: Keyworker support, counselling services (with our 'Wellbeing coach'), Pastoral/Mentoring support from a DSL/DDSL and ensuring that there is a trusted adult for the children involved to speak with if they wish to. It may be necessary for us to maintain arrangements to protect and support victims for some time, working with Children's Social Care and other agencies as required.

We may also need to provide support to children who have witnessed harmful sexual behaviour, or otherwise been affected. This will be informed by our risk assessment and our ongoing work.

We will also consider whether any intervention or support is required as part of a whole-setting approach for our children, or with the wider school community.

5. Outcomes

We will always seek to ensure that outcomes are appropriate and proportionate to the circumstances in relation to a report, liaising with our safeguarding partners as appropriate. *(See Appendix 4 for ECC guidance on contacting other agencies).*

The following scenarios may apply:

Manage internally

In some cases of sexual harassment, for example one-off incidents, we may take the view that the children involved are not in need of early help or statutory intervention. In these cases, we will follow our other school policies in addressing matters, for example our behaviour / anti-bullying policies, and provide pastoral support where appropriate *[you can access these policies on our school website]*.

Early Help

Where statutory intervention is not required or agreed, we may use early help instead. 'Early Help' means providing support for children of all ages that improves a family's outcomes or reduces the chance of a problem (KCSiE, 2025) as soon as a problem emerges. We will work with parents and carers and other relevant partners when following this approach, which can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation.

Requests for support to Children's Social Care

Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a request for support to Children's Social Care. We will inform parents and carers of this unless to do so may put a child at additional risk. We will seek advice from other safeguarding partners in individual cases.

If we make a request for support, Children's Social Care will consider whether the children involved need protection or other services. Where statutory assessments are appropriate, the school will work with Children's Social Care and other agencies as appropriate. Partnership working helps to ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

In some cases, Children's Social Care will review the evidence and decide a statutory intervention is not appropriate. If a statutory assessment is not considered appropriate by Children's Social Care, we will consider what other support for the children involved may be required. We will make further requests for support to Children's Social Care if we consider that a child remains in immediate danger or at risk of harm.

Reporting to the police

Where a report of rape, assault by penetration or sexual assault is made, we will report it to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

Where we have made a report to the police, we will consult with them and agree what information can be disclosed to our staff and others, in particular the alleged perpetrator and their parents or carers. We will also discuss the best way to protect the victim and their anonymity.

Where there is a criminal investigation, we will work closely with the police and other agencies as appropriate to support all children involved (including potential witnesses). This will help to ensure that any actions we take do not jeopardise a police investigation. Sometimes the police will decide that further action is not required. In these circumstances we will continue to engage with other agencies to support the children involved.

Appendix 1: Harmful Sexual Behaviour: Common Language Framework

When dealing with incidents of sexual behaviour, it is important there is mutual understanding of these behaviours and of whether they are normally developmental or harmful. This framework is to support settings in assessing behaviours and to promote consistency of approach across the system. It is also important to think about appropriate and inappropriate language when discussing sexual behaviours, and the impact of this for the children/young people (CYP) we are working with.

The below Common Language Framework is in-line with the current language used and recommended by several sources including: the Government, Children's Social Care, the Police and Health.

1. General language around harmful sexual behaviour
2. Sexual Offence definitions

General language around harmful sexual behaviour	
Term	Definition
Harmful Sexual Behaviour (HSB)	Description from Keeping Children Safe in Education: <i>Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive, and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.</i> Description from Hackett, 2021 & NICE 2014: <i>Any Young Person under 18 years of age, who demonstrates behaviours outside of their normative parameters of development.</i>
Child on child abuse	The term used to describe abusive behaviour, including harmful sexual behaviour, occurring amongst CYP. This was previously referred to as peer-on-peer abuse.
Child displaying the harmful sexual behaviour / perpetrator / alleged perpetrator	Harmful sexual behaviour is a behaviour the CYP is using to communicate an unmet need. Understanding this unmet need is important. Labels such as 'perpetrator' and 'abuser' should be avoided, especially in front of the CYP. 'Child displaying the harmful sexual behaviour' is a useful term. Keeping Children Safe in Education states: <i>'... schools and colleges should think very carefully about terminology [Alleged perpetrator(s)] and where appropriate 'perpetrator(s)', especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well... the use of appropriate terminology will be for schools and colleges to determine, as appropriate, on a case-by-case basis.</i>
Child who has experienced harmful sexual behaviour / victim / survivor	A CYP who has experienced harmful sexual behaviour may not want to be referred to as 'victim' or 'survivor'. Settings should be guided by the CYP's wishes on how they would like to be referred to.



	Keeping Children Safe in Education states: <i>... 'victim'... is a widely recognised and understood term. It is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.</i>
Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')	For relationships where both CYP are under 16 and abuse is present, it is referred to as 'abuse in intimate personal relationships between children' or 'teenage relationship abuse'. In law, the term 'domestic abuse' is only applied to relationships where both parties are over 16 years of age.
Sexual violence offences	Sexual violence is a non-legal term which can be used to describe the range of sexual offences set out in the Sexual Offences Act 2003. Definitions of these offences can be found in the section below.
Consent	The dictionary definition of consent is 'permission for something to happen or agreement to do something.' But consent in a sexual context is wider than this. Keeping Children Safe in Education states: <i>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 s/he agrees 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.</i> Rape Crisis UK states: <i>Consent happens when all people involved in any kind of sexual activity agree to take part by choice. They also need to have the freedom and capacity to make that choice.</i> Someone doesn't have the freedom and capacity to agree to sexual activity by choice if: • <i>They are asleep or unconscious.</i> • <i>They are drunk or 'on' drugs.</i> • <i>They have been 'spiked'.</i> • <i>They are too young.</i> • <i>They have a mental health disorder or illness that means they are unable to make a choice.</i> • <i>They are being pressured, bullied, manipulated, tricked, or scared into saying 'yes'.</i> • <i>The other person is using physical force against them.</i> <i>Consent can be withdrawn at any time, including during sex or a sexual act. Just because someone consented to something before doesn't mean they consented to it happening again.</i>

Zero-tolerance culture	School and college leaders should create a culture where sexual harassment and online sexual abuse are not tolerated, and where they identify issues and intervene early to better protect children and young people. (Ofsted 2021) Keeping Children Safe in Education states: <i>"Schools and colleges should be aware of the importance of making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so 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"</i>
Power imbalance	A power imbalance is an environment, relationship, or interaction where one party has far more social power than the other. Many factors can lead to a power imbalance such as: physical strength, social standing, abuse, age or one party holding sensitive information about the other. Keeping Children Safe in Education states: <i>"Schools and colleges should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s)."</i>
Coercive and controlling behaviour	The Government definition outlines the following: <i>"Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim"</i> <i>Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour"</i>
Continuum of sexual behaviours	Hackett (2010) created a continuum which presents sexualised behaviour as a range from 'normal' to 'inappropriate', 'problematic', 'abusive' and 'violent'.
Statutory Partners	Children's Social Care, the Police and Health Services are known as Statutory Partners.
Sexual Assault Referral Centre (SARC).	Keeping Children Safe in Education states: <i>"SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred."</i>
Children and Young People's Independent Sexual Violence Advisors (ChISVAs)	Keeping Children Safe in Education states: <i>"[ChISVAs] provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim."</i>

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.
Child Sexual Exploitation (CSE)	Child sexual exploitation: definition and guide for practitioners states: <i>“Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.</i> The Children’s Society have produced ‘Appropriate Language in Relation to Child Exploitation: Guidance for Professionals’. The document seeks to provide guidance to professionals on the appropriate use of language when discussing CYP and their experience of exploitation in a range of contexts.
Risk in the Community	The ESCB Risk in the Community page states: <i>“Risk in the Community is the Essex partnership approach to tackling exploitation of young people. Traditionally, safeguarding young people focused on risks within the home, but it is more apparent today that young people experience risks in various contexts outside their family unit.”</i>
Grooming	The ESCB define grooming as: <i>“Actions carried out to target, befriend, or establish an emotional connection with a child to lower their inhibitions in preparation for exploiting them and establish control over the child. This can take place over a short or long period of time, online or in person. The perpetrator can be known to the child or a stranger. It often includes breaking down a child’s protective factors to isolate them, such as a positive relationship with family and friends who would usually be able to be alerted to concerns and safeguard the child. Family and friends of the child can also be groomed as part of this process.”</i>

Sexual Offence definitions	
Sexual Offences	Definition
Rape	Sexual Offences Act 2003 definition: <i>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.</i>
Assault by Penetration	Sexual Offences Act 2003 definition: <i>A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.</i>



Sexual Assault (previously referred to as ‘indecent assault’ prior to the Sexual Offences Act 2003)	Sexual Offences Act 2003 definition: <i>A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.</i> Note from Keeping Children Safe in Education: <i>Schools and colleges 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.</i> Rape Crisis UK: <i>It’s a really common myth about sexual assault, rape and other kinds of sexual violence and abuse that they have to involve physical force or leave the person with visible injuries. But that isn’t true. There are many other ‘tactics’ that someone might use to sexually assault someone. For example: pressure, manipulation, bullying, intimidation, threats, deception, drugs, or alcohol. BUT, none of these have to have happened for it to still be sexual assault. Many people find themselves unable to speak or move when faced with a scary, shocking, or dangerous situation. If that happened, it does not mean the person gave their consent. And if there’s no consent then it is always sexual assault.</i>
Causing someone to engage in sexual activity without consent	Sexual Offences Act 2003 definition: <i>A person (A) commits an offence if: s/he intentionally causes 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.</i> Note from Keeping Children Safe in Education: <i>this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.</i>
Sexual harassment	Rape Crisis UK: <i>Sexual harassment is any unwanted sexual behaviour by someone towards another person that makes them feel upset, scared, offended, or humiliated, or is meant to make them feel that way. Sexual harassment is a form of unlawful discrimination under the Equality Act 2010. This means that people are legally protected from sexual harassment in certain places – for example, at work, on transport and at schools, colleges, and universities. So, if sexual harassment does happen in these places, victims and survivors have the right to take action to find a solution. This could include making a complaint or making a claim in the civil courts. Some forms of sexual harassment automatically break criminal law in England and Wales and are therefore crimes. These include: stalking, indecent exposure, ‘upskirting’ and any sexual harassment involving physical contact (this amounts to sexual assault in English and Welsh law).</i>



	<i>Other forms of sexual harassment might also break criminal law, depending on the situation. For example, if someone carries out sexual harassment behaviours on more than one occasion that are intended to cause another person alarm or distress, they may be committing the crime of harassment.</i> Description from Keeping Children Safe in Education: <i>[Sexual harassment is] ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school or college.</i> <i>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.</i> <i>Whilst not intended to be an exhaustive list, sexual harassment can include:</i> ▪ <i>sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names</i> ▪ <i>sexual “jokes” or taunting</i> ▪ <i>physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.</i> ▪ <i>displaying pictures, photos or drawings of a sexual nature</i> ▪ <i>upskirting (this is a criminal offence)</i>
Online sexual harassment	Description from Keeping Children Safe in Education: <i>This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:</i> ▪ <i>consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of those under 18 is a criminal offence.</i> ▪ <i>sharing of unwanted explicit content</i> ▪ <i>sexualised online bullying</i> ▪ <i>unwanted sexual comments and messages, including, on social media</i> ▪ <i>sexual exploitation; coercion and threats, and</i> ▪ <i>coercing others into sharing images of themselves or performing acts they’re not comfortable with online.</i>
Upskirting	The Voyeurism (Offences) Act 2019 which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. Description from Keeping Children Safe in Education: <i>[Upskirting] 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 humiliation, distress, or alarm.</i>
Consensual and non-consensual sharing of nude and semi-nude images and/or videos	The Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales) criminalised indecent photographs of children. The Act states:



Sexting Youth produced sexual imagery Nudes Indecent imagery	▪ It is an offence to take, permit to be taken, possess, distribute, show, and make indecent images of children ▪ The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18 The below is paraphrased from the Government guidance ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’ (2024): In the context of harmful sexual behaviour within education settings, we are referring to: a person under the age of 18 creating and sharing nudes and semi-nudes of themselves with a peer who is also under the age of 18; a person under the age of 18 sharing nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18; and a person under the age of 18 who is in possession of nudes and semi-nudes created by another person under the age of 18. The sharing of nudes and semi-nudes of under 18s by adults (18 and over) constitutes child sexual abuse and education settings should always inform their local police force as a matter of urgency. The term ‘sharing nudes and semi-nudes’ encompasses the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexual or criminal. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where: ▪ CYP find nudes and semi-nudes online and share them claiming to be from a peer ▪ CYP digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person ▪ images created or shared are used to abuse or blackmail peers e.g., by: ➤ children and young people selling nudes or semi-nudes of others online ➤ children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity ➤ children and young people hacking a peer’s account to share images more widely without consent to publicly shame Nude or semi-nude images, videos or live streams may include more than one CYP
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Definition of indecent

'Indecent' is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a CYP is indecent is for a jury, magistrate or district judge to decide based on what is the recognised standard of propriety.

Indecent imagery does not always mean nudity; however, images are likely to be defined as such if they meet one or more of the following criteria:

- nude or semi-nude sexual posing (e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear)
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a CYP
- someone hurting someone else sexually
- sexual activity that includes animals

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Appendix 2:

ECC Harmful Sexual Behaviour: Individual Risk Assessment and Safety Plan

[Keeping children safe in education](#) advises that an immediate risk and needs assessment is made following a report of sexual violence. Where sexual harassment is reported, the need for a risk assessment should be considered on a case-by-case basis. The setting risk assessment and safety plan is not designed to replace risk assessments created by other agencies such as Children's Social Care or the police - these professional risk assessments should inform the setting's response and assessment.

This individual risk assessment and safety plan template can be used to assess the risks for the victim and the alleged perpetrator. Each child or young person (CYP) will need a separate individual risk assessment and safety plan. The tool should be used immediately after the incident to help inform the response and should be updated as the situation develops and reviewed regularly.

When completing this risk assessment and safety plan, settings will need to consider whether the sexual behaviours displayed are harmful. The NSPCC website page [‘Understanding sexualised behaviour in children’](#) provides support for settings to be able to distinguish developmentally typical sexual behaviour from sexual behaviours that are problematic or harmful. The tool is based upon Hackett's Sexualised Behaviour Continuum (2010), as referenced in Keeping children safe in education, and provides settings with guidance, training, and resources. Settings that have a licence to use the Brook Traffic Light Tool can also use this to assess the behaviour.

In this document, we use the terms ‘victim’ and ‘alleged perpetrator’. These are widely recognised and understood terms and helpful for the purposes of this guidance. However, it is important that settings are mindful of the language used to describe CYP and that they use appropriate language and terms. It is also important to understand that not all those who have experienced abuse will recognise themselves as a ‘victim’ and to understand that ‘alleged perpetrators’ may also be ‘victims’ of abuse themselves.

The Individual Risk Assessment and Safety Plan has the following sections:

1. [Child or Young Person's details and risk assessment information](#)
2. [Incident and response details](#)
3. [Risk considerations](#)
4. [Risk factors and protective factors](#)
5. [Safety plan](#)
6. [Risk assessment and Safety Plan agreement](#)
7. [Appendix A: Risk and Protective Factors - examples](#)



1. Child or Young Person's details and risk assessment information

CYP details	
Name	
Date of birth	

Risk assessment and safety plan details	
Risk assessment and safety plan completed by:	
Agencies contributing to the risk assessment and safety plan: <i>Include the agency name and worker name</i>	
Date risk assessment and safety plan completed:	
Date to be reviewed:	
Dates the risk assessment and safety plan has been updated:	

Contextual information about the CYP	
Is the CYP currently known/open to Social Care? Have they previously been known/open? <i>If yes, please detail the level of involvement: Child Protection (CP), Child in Need (CiN), Child in Care (CiC) or Family Solutions.</i>	
Does the CYP have a One Plan or EHCP?	
Does the CYP have any health needs, including mental health concerns?	
Are any other professionals involved with the CYP or their family? <i>If yes, please detail the agency, name of the worker and the worker's role.</i>	
Who are the CYP's parent/carers and siblings? What is the family background?	

2. Incident and response details

The incident/behaviours	
Date and time of incident	
Location of incident	



Name and age of the victim	
Name and age of the CYP displaying the harmful sexual behaviour	
Is there a power imbalance between the CYP involved? <i>For example, is there a difference in: age, maturity, confidence, social status? Does one CYP have a disability or learning difficulty? Was there consent or the possibility of forced consent/coercion?</i>	
How the incident became known to staff	
Detail of the incident <i>Include the types of behaviour and language observed/reported. Record any harm caused that you are aware of</i>	
Has a crime possibly been committed as part of this incident? <i>See the Common Language Framework (Appendix B) for crime definitions</i>	<i>If you have answered yes to this question, you need to seek advice from both the Police and Social Care as part of your response. The seriousness of the potential crime will impact the method you use to contact these Statutory Partners. For guidance, see Appendix E – Contacting other agencies, including statutory agencies’.</i>
Is this the first time that the CYP has displayed harmful sexual behaviours? <i>If no, detail the previous incidents/behaviours. Is there a potential pattern of concerning, problematic or inappropriate behaviour? Are there any patterns to the behaviour such as similar times/locations/victims etc</i>	
Could there potentially be other victims?	
Assessed category for this behaviour	<i>Normal, inappropriate, problematic, abusive or violent</i>
Reasoning for assessing the behaviour in the category	

CYP's response to the incident	
How has the CYP responded to the incident? <i>Capture the CYP's voice here. Consider their behaviour, mental health, whether they reported the incident, their attitude to it etc</i>	
If applicable, what needs could their behaviour be communicating?	



3. Risk considerations

Overview of wider risks and concerns for the CYP	
Presenting behaviour	
Dysregulation	
Relationship	
Family dynamic	
Community	
Any other concerns	

Assessment of harmful sexual behaviour risk	
CYP's risk to self	How? -
CYP's risk to/from specific CYP	Who? – How? -
CYP's risk to/from other CYP in the setting	Who? – How? -
CYP's risk to/from staff/adults	Who? – How? -
CYP's risk in the community	Who? – How? -
Does the CYP have any siblings whose risk needs to be considered as part of the setting response?	

Contextual considerations	
Record any known stressors/triggers for the behaviour. <i>Consider: particular lessons, activities, times of day, peers, staff, activity outside of school etc.</i>	
Record any risky locations identified. <i>Consider: Toilets, changing rooms, unsupervised areas of the school etc.</i>	
Record any risky activities including use of technology. <i>Consider: school trips, sports lessons, use of internet, computers, phones etc.</i>	
Record transport arrangements to and from school and associated risks	
Overview of the CYP's wellbeing	
Before the incident	
After the incident	
Are parents/family accessing support for CYP?	



4. Risk factors and protective factors

See [Appendix A](#) for prompts on the risk factors and protective factors to consider

Risk factors	
In the CYP	
In the family	
In the setting	
In the community	

Protective factors	
In the CYP	
In the family	
In the setting	
In the community	

5. Safety plan

Identified issue <i>Is the presenting behaviour/risk potential or actual?</i>	Strategies to reduce the presenting behaviour/risk <i>Consider protective factors and current on-going work</i>	Agency/adult supporting the strategy	Review <i>Has the presenting behaviour/risk reduced? Are the strategies effective or do they need amending?</i>
<i>Example: Evan is touching his genitals in public spaces where other CYP may witness him</i>	- Education work – NSPCC Pants - Identifying private spaces where Evan can do this - Welfare check with CYP who have witnessed the behaviour	- DSL - Parent(s)	



6. Risk assessment and Safety Plan agreement

Risk assessment and Safety Plan agreed by and shared with:		
Name	Role	Signature
	Headteacher	
	Designated Safeguarding Lead	
	Child / Young person	
	Parent / Carer	
	Other agencies	

Appendix A: Risk and Protective Factors

	Risk Factors	Protective Factors
In the child	- Genetic influences - Genetic disposition - Prenatal alcohol exposure - Low IQ - Learning disabilities - Specific development delay or neuro diversity - Communication difficulties - Difficult temperament - Physical illness - Academic 'failure/disappointment' - Low self-esteem - Feelings of isolation - Difficulties with impulse control - Underdeveloped executive functioning skills - Low harm avoidance - Sensation seeking - Difficulties with self-control/regulation - Aggressiveness - Anxiety - Depression - Hyperactivity/ADHD - Early persistent social, emotional and mental health needs - Early substance use - Social disengagement / Retreating coping strategy - Conduct disorder - Favourable attitudes toward drugs - Rebelliousness - Early substance use - Antisocial behaviour - Self-injury - Risk taking behaviours - Risk of knowing or knowing of someone who has completed suicide.	- Secure attachment(s) experience - Outgoing temperament as an infant - Good communication skills, sociability - Being a planner and having a belief in control - Humour - Confident - A positive attitude, optimistic approach to life - Experiences of success and achievement - Faith or spirituality - Capacity to reflect - Ability to self-regulate/self-soothe - Ability to make friends and get along with others - Positive physical development - Good self-esteem - Good coping skills and problem-solving skills - Engagement and connections in two or more of the following contexts: at school/setting, with peers, in athletics, employment, religion, culture - Identity exploration in love, work, and world view - Subjective sense of self-sufficiency, making independent decisions, becoming financially independent - Future orientation - Achievement motivation - Feeling valued
In the family	- Overt parental conflict including domestic violence - Family breakdown (including where children are taken into care or adopted)	- At least one good parent-child relationship (or one supportive adult) - Affection - Clear, consistent discipline



	• Inconsistent or unclear boundaries and limitations • Hostile and rejecting relationships • Failure to adapt to a child's changing needs • Physical, sexual, emotional abuse, or neglect, maltreatment • Parental or sibling psychiatric illness • Parental or sibling criminality, Substance e.g. drugs & alcoholism or personality disorder • Death and loss – including loss of friendship & pets • Permissive parenting • Parent-child conflict • Inadequate supervision and monitoring • Low parental warmth • Parental hostility • Harsh discipline • Low/high parental aspirations for child where the child is experiencing extreme pressure or feel unsupported • Fragile attachments with parents • Leaving home as a result of conflict • Homelessness • Family distress • Leaving institutional/government care (hospital, foster care, correctional facility, etc.)	• Support for education • Supportive long-term relationship or the absence of severe discord • Responsiveness • Protection from harm and fear • Opportunities to resolve conflict • Adequate socioeconomic resources for the family • Consistent and clear boundaries and limitations implemented and maintained including family that provides structure, limits, rules, monitoring, and predictability • Language-based, rather than physical, discipline • Extended family support • Supportive relationships with family members • Clear expectations for behaviour and values • Balance of autonomy and relatedness to family • Behavioural and emotional autonomy • Healthy prenatal and early childhood development • Connectedness to adults in the extended family / family support network
In the setting	• Bullying / abuse including online (cyber) • Discrimination e.g., Racism • Breakdown in or lack of positive friendships • Peer influences towards risk taking e.g., associating/partaking with drug-using peers • Peer pressure • Fragile pupil to teacher/setting staff relationships • Experience of educational setting 'failures' • Low motivation around education setting • Accessibility/ availability • Peer rejection / lack of a sense of belonging/ Interpersonal alienation • Exclusion / Non-attendance • Aggression toward peers • Accessibility/ availability • Lack of positive role models • Low ratio of caregivers to children	• Inclusive practice • Personalised/ tailored curriculum if required • Clear policies on behaviour and bullying • Staff behaviour policy (also known as code of conduct) • 'Open door' policy for children to raise problems • A whole-setting approach to promoting good mental health • Good pupil to teacher/setting staff relationships • Positive classroom management • A sense of belonging • Positive peer influences/ friendships • Effective safeguarding and Child Protection policies. • An effective early help process • Understand their role in and be part of effective multi-agency working • Appropriate procedures to ensure staff are confident to raise concerns about policies and processes, and know they will be dealt with fairly and effectively including risk assessments • Support for early learning • Access to supplementary services to support the child's needs • Stable, secure attachment to childcare provider • Regulatory systems that support high quality of care • Healthy peer groups



		• Pupil educational setting engagement/ motivation • Positive teacher expectations • Effective classroom management • Positive partnering between educational setting and family • High academic standards • Presence of mentors and support for development of skills and interests • Opportunities for engagement within educational setting and community • Positive norms • Physical and psychological safety • Opportunities for exploration in work and setting • Positive adult role models, coaches, mentors
In the community	• Socio-economic disadvantage • Homelessness • Disaster, accidents, war, or other overwhelming events • Discrimination • Exploitation, including by criminal gangs and organised crime groups, trafficking, online abuse, sexual exploitation and the influences of extremism leading to radicalisation • Other significant life events • Presence of neighbourhood crime • Negative Social Media	• Wider supportive network • Good/stable housing • High standard of living • Opportunities for valued social roles • Range of sport/leisure activities available • Steady employment • Availability of services (social, recreational, cultural, etc) • Access to Technology

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Appendix 3: HSB Risk Safety plan

Severity	Multiplier					
Extreme / Catastrophic	5	5	10	15	20	25
Major	4	4	8	12	16	20
Moderate	3	3	6	9	12	15
Minor	2	2	4	6	8	10
Insignificant	1	1	2	3	4	5
	Multiplier	1	2	3	4	5
Likelihood		Remote	Unlikely	Possible	Probable	Certain

	Key	
Severe	20 - 25	Unacceptable level of risk exposure which requires immediate corrective action to be taken
Major	12 - 16	Unacceptable level of risk exposure which requires constant active monitoring, and measures to be put in place to reduce exposure
Moderate	5 - 10	Acceptable level of risk exposure subject to regular active monitoring measures
Minor	3 - 4	Acceptable level of risk exposure subject to regular passive monitoring measures
Insignificant	1 - 2	Acceptable level of risk subject to periodic passive monitoring measures

Pupil Start Date		Review Date:		Head teacher signature;	
Pupil Name:				School Contact No	
Parent Contact No:				Has IHCP? Yes / No	On Medication Yes ☐ No ☐

Reason for change/update or reason for general requirement for this specific Risk Assessment; Example script has been involved in a relationship with a much younger pupil. XX has a High Risk Response risk assessment ADD AGE OF BOTH STUDENTS (Other pupils' details are in their own Safety plan) – please ask SLT members for details if you are going to be working directly with XX, or the other pupil/s. This is to be delivered in a sensitive and respectful way, while ensuring that the boundaries are clear and explicit.

Details of Risk	To whom	Severity	Likelihood	SxL = Risk rate	Control measures	Further actions
Allegations against staff.	Students & Staff	3	3	9	- Constant one to one supervision from XX - XX to remind pupil of school standards and appropriate behaviour in school. - Keep access to the classroom door clear. - Sit opposite side or arm's length away from XX. - Ensure staff are sitting in view of the classroom entrance. - Put in place a multiple-allegation protocol should this happen once – DSL & HT to be involved and also LADO.	Refer to organisational Safeguarding protocol Undertake a multi-allegation protocol doc if an allegation is made
Sexualised behaviour	Students & Staff	4	4	16	- Constant one to one supervision - Pupil told there and then that this type of behaviour is not appropriate. - When XX wishes to use the toilet, ensure that no other student are in there. - Staff to escort student back and forth.	- XX taken outside of classroom for reflection time about appropriate behaviour. - Refer to organisational Safeguarding protocol. - Review timetable and access environment for 1:1 work. - Refer to specific Safeguarding contract between XX and School

					Staff to ensure XX uses the disabled cubicle, if other students are using main toilets.	
Absconding	Student	4	3	12	- Constant supervision from XX. - Absconding protocol to be in place within 10 minutes of his absconding. - Contact XX after 10 mins after registration if he does not attend. - Call Home (or Care Home as appropriate) if XX does not respond. - If no show contact Home (or Care Home) as appropriate. - Identify how XX is feeling. - Ensure XX is supervised at all times and not left alone. - Staff to remain vigilant and anticipate XX's behaviour/mood. - Explain ground rules and remind XX of consequences. - Explain the consequences of 'stranger danger' and its impact longer term.	Contact police within 10 mins if whereabouts are not established. Appraise Police of XX's HSB high risk
Managing assessed HIGH RISK HSB/ Grooming of other pupils	Student & peers/other children & Y/P in the community	5	5	25	- Ensure that other workers who support XX in the community have access to this RA And have read the Respond RA which highlights the high risk that XX poses - Ensure that SLT induct any other one to one workers on XX's strengths, needs and risks - Constant one to one supervision incl. staff eating lunch with pupil and clear ground rules for toilet breaks - Pupil told there and then that this type of behaviour is not appropriate. - When XX wishes to use the toilet, ensure that no other children or young people are in there. - Staff to escort student back and forth at all times. - Staff to ensure XX uses disabled cubicle, if other children & Y/P are using main toilets. - If XX engage inappropriate behaviour i.e. touching, remove student from the situation. - Inform safeguarding lead.	- Refer to organisational Safeguarding protocol. - Contact police, relevant professionals. Explain high risk re HSB - Ensure XX is part of induction for staff who will work with him in the community - Provide an open & transparent working relationship in which HSB and stresses and sex education are all part of a regular conversation and lesson - Invite PLACEMENT & RELEVANT AGENCY WHERE REQUIRED OR RECOMMENDED about mental health and sexual health (STAFF MEMBER NAMED to coordinate)



					• Inform Home or Care Home as appropriate and social worker when he demonstrates this type of behaviour (<i>this maybe specific behaviour that student displays and may formed in conjunction with the external agencies assessments</i>). • Call emergency meeting with SLT if he exhibits sexualised behaviour towards a young person. • Staff to inform senior management team <u>immediately</u>.	
Date written: Completed by: Signed off by _____ (SLT only)						

Appendix 4: Contacting other agencies, including statutory agencies

“Schools and colleges should not feel that they are alone in dealing with sexual violence and sexual harassment”
Keeping Children Safe in Education (DfE, 2025)

When dealing with incidents of Harmful Sexual Behaviour, schools and settings will often need to contact outside agencies to access specialist advice and services. Local authority Children’s Social Care and the police will be important partners where a crime might have been committed or there are safeguarding concerns for a CYP.

This guidance brings together statutory and non-statutory guidance on when schools should consider contacting other agencies in their response to harmful sexual behaviour incidents and child-on-child abuse.

No guidance can give definitive step-by-step advice for every case. Each case will need to be handled according to its own unique circumstances and decisions made on a case-by-case basis.

Contents

When to contact the Police
When to contact Children’s Social Care
When to consider Early Help procedures
When to involve Health agencies
When to contact the ECC Education Access Team

When to contact the Police

This guidance draws upon several statutory and non-statutory documents. The Designated Safeguarding Lead (DSL) and Deputy DSLs should read the below documents in their entirety and be familiar with them.

Document	Summary in relation to HSB	Specific pages of interest for Police contact advice
When to call the police - guidance for schools and colleges	This document contains information on when settings should contact the police. Regarding Sexual Offences, it advises settings to defer to the documents below. It advises that if the crimes of rape or a serious sexual assault are involved, the police should be called immediately.	Pages 2 to 8 – set out the general principles on when settings should contact the police and how to handle this alongside the setting’s processes and policies Page 13 – Harassment flow chart. Sexual harassment is included Page 14 – Sexual offences flow chart
Keeping children safe in education (2025)	Statutory guidance for schools and colleges on safeguarding CYP, including information on how to handle cases of harmful sexual behaviour.	Pages 105 – 135 - Part five: Child-on-child sexual violence and sexual harassment. Reporting to Police and the on-going management of cases is covered in this section. We advise being familiar with the whole section

		Pages 121 – 123 – Contains the information on initially reporting to Police
Working Together to Safeguard Children (2023)	A guide to inter-agency working to safeguard and promote the welfare of CYP. In many incidents of harmful sexual behaviour, it will be important to engage other agencies and this document provides the framework for doing so.	The whole document is relevant
Sharing nudes and semi-nudes: advice for education settings working with children and young people	A guidance document providing advice for education settings dealing with incidents involving CYP sharing nudes and semi-nudes.	The whole document is relevant

Do you need to consider contacting the police?

If a crime has or may have been committed, the setting needs to consider contacting the police. [When to call the police - guidance for schools and colleges](#) contains a list of factors you will need to consider within this decision. These include:

- the seriousness of the incident – some crimes MUST be reported to the police (see the table below for further information)
- the level of harm caused
- the circumstances leading to the incident
- aggravating factors which contribute to making the incident and level of harm more serious. Aggravating factors increase the level of risk, or highlight the need for a wider investigation and the need for the involvement of a range of agencies as well as the police
- whether the young people involved have any vulnerabilities
- whether this could be part of a pattern of behaviour also occurring in the community, in which case the police will want to be involved
- the age of the CYP who has displayed the harmful sexual behaviour. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases. This should be in parallel with contacting Children's Social Care
- the wishes of the victim and how they wish to proceed must be important considerations within the setting's response to a report. They should have as much control as is reasonably possible over decisions regarding the support provided to them and the progression of the investigation, however this must be balanced carefully with the setting's duty and responsibility to protect CYP

The table below organises the guidance on reporting to the Police by crime. Definitions of Sexual Offences can be found under the [Sexual Offences Act 2003](#). The setting must be familiar with these definitions to enable accurate decision making.

Crime	Guidance on involving the Police	Factors to consider in your decision
Rape	When to call the police - guidance for schools and colleges - call the Police immediately if a rape or serious sexual assault is reported.	▪ Any report to the police will generally be in parallel with a referral to Children's Social Care
Assault by Penetration		
Sexual assault	Keeping Children Safe in Education - rape, assault by penetration and	

Crime	Guidance on involving the Police	Factors to consider in your decision
	sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.	
Sexual harassment, sexual bullying and online sexual harassment	When to call the police - guidance for schools and colleges - a sexual element within harassment is an aggravating factor and requires consideration of a referral to police. Keeping Children Safe in Education – depending on the circumstances of the incident/s and the presence of aggravating factors, the response to a report of sexual harassment can vary from handling the incident internally to reporting to statutory partners such as the police.	- What is the nature of the harassment? What behaviours have constituted the harassment? Are any of them crimes? - What are the victim's wishes? Do they want to report to the police? - What level of harm has been caused by the harassment? - Is this a one-off incident of harassment or an on-going campaign? - How many victims of the harassment are there? Is it in the interests of the school/wider community to report to police?
Causing someone to engage in sexual activity without consent	Sexual Offences Act 2003 -Causing someone to engage in sexual activity without consent is a crime.	Any report to the police will generally be in parallel with a referral to Children's Social Care
Upskirting	Keeping Children Safe in Education – lists upskirting as a behaviour that can be included within sexual harassment but acknowledges that it is a criminal offence.	Any report to the police will generally be in parallel with a referral to Children's Social Care
Youth produced sexual images / sexting / nudes	Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk) Making, possessing, and distributing any imagery of someone under 18 which is 'indecent' is illegal, including self-produced imagery. However, the NPCC has made it clear that incidents involving sharing nudes and semi-nudes should have an immediate focus on safeguarding CYP. In many cases, education settings may respond to incidents without involving the police, for example where an incident can be defined as 'experimental' and there is no evidence of abusive or aggravating elements. The police may need to be involved in some cases where there are abusive	- Can the incident be defined as aggravated or experimental? See Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk) 1.6(a) for definition guidance. - Is there an immediate risk to the CYP? For example, are they presenting as suicidal or self-harming as a result? - What are the victim's wishes? Do they want to report to the Police? - Would contacting the police be a proportionate response? - What was the motivation behind the incident? - How appropriate was the CYP's behaviour? - How widely has the image been shared? Was it shared without the consent of the CYP who produced the image? - Is there reason to believe that the CYP has been coerced, blackmailed, or groomed,

Crime	Guidance on involving the Police	Factors to consider in your decision
	and/or aggravating factors. A referral should be made to the police if a CYP has been pressured or coerced into sharing an image, images have been shared without consent and with malicious intent, if there was a deliberate intent to cause harm by sharing the nudes and semi-nudes or if they have been used to bully or blackmail a CYP. If the incident involves an adult (age 18 or over), the Police must be informed.	or there are concerns about their capacity to consent (for example, owing to special educational needs)? - Does what you know about the images or videos suggest the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent? - Do the images involve sexual acts and the pupil in the images or videos is under 13? - Has the nude or semi-nude been shared beyond its intended recipient? - See ANNEX A of Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk) for a comprehensive list of questions to support the assessment of the incident

If an incident is reported to the police, a referral to local authority Children's Social Care will also generally be made.

In the initial response to an incident, whilst considering whether to report the crime to the police, the setting should:

- make the decision to report to police or manage internally at an early stage, stopping any internal school/setting investigation immediately once the decision to report to police has been made. The setting should only ask questions to establish the basic facts of the incident before making the decision
- fully document the setting's initial enquires to establish the basic facts, as they may be required if the matter goes to court. This includes recording questions asked to young people and their replies
- record the rationale for involving the Police. This will include advice received from other agencies such as the police or Children's Social Care
- make every effort to preserve any relevant evidence
- assign a single point of contact between the setting and police – this will usually be the Headteacher or Designated Safeguarding Lead

For further information on how to proceed within the setting once a report has been made to police, please see Keeping Children Safe in Education. Pages 3 and 4 of [When to call the police - guidance for schools and colleges](#) provide information and advice for settings who are reporting a crime to the police.

How to contact the Police in Essex

- 999 – for an emergency. If there is: a danger to life; a risk of injury; or a serious crime is in progress or about the happen
- 101 or [online](#) – to report non-emergency crimes
- Your local Children and Young Persons (CYP) Officer or the Youth Justice Police Team (YJT) (Youth.justice.team@essex.police.uk) - for advice and guidance. The CYP Officers work alongside the Youth Justice Police Team so if you do not know your CYP Officer or your Officer is not on shift, this is a good alternative contact. *The YJT may be able to offer general advice but if the CYP's details are shared with them, it is likely they will be duty bound by National Crime Recording Standards to record the crime. This does not criminalise a CYP but will amount to sharing information with the police. Be clear on whether you are seeking 'general guidance' or 'specific information sharing about an incident'.*

Dealing with an incident internally

If a setting decides to deal with an incident internally without reporting it to the police, the setting should:



- record the rationale for not involving the Police if there has been a crime or potential crime reported. This will include advice received from other agencies such as the Police or Children's Social Care
- investigate the incident in line with the setting's behaviour policy and any other relevant policies
- record the outcome of the investigation and how the incident has been resolved

Please note that if a referral to the Children and Families Hub is deemed necessary, this may result in a referral to the Police.

When to contact Children's Social Care

Children's Social Care is the main point of contact for settings if there are safeguarding concerns about a CYP. ***If a CYP is suffering significant harm, or is at immediate risk of significant harm, a request for support to Children's Social Care must be made immediately via the Priority Line.***

The [Effective Support for Children and Families in Essex \(2021\)](#) contains the information settings need to decide whether Children's Social Care should be contacted about an incident of harmful sexual behaviour or child on child abuse. The 'indicators of possible need' (pages 23 – 29) are a helpful resource for settings looking for an indication of the likely level of need for the CYP.

The 4 Levels of need in Essex, set out on pages 8-11 in the Effective Support Document, are:

- ☐ Universal – Level 1
- ☐ Additional – Level 2
- ☐ Intensive – Level 3
- ☐ Specialist – Level 4

In many cases of harmful sexual behaviour or child on child abuse, Children's Social Care should be consulted. A request for support may be needed, depending on the level of need the CYP is presenting.

The Consultation Line at the Children and Families Hub offers professionals in Essex the opportunity to discuss with a social worker their concerns about a CYP. This can support settings in deciding whether a request for support is needed (Levels 3 and 4) or if Early Help procedures should be initiated (Levels 2 and 3). Further details of this service can be found on page 21 of [Effective Support for Children and Families in Essex \(2021\)](#).

How to contact Children's Social Care in Essex:

- **Request for Support:** Requests for support are made online via an [Online Form](#). Details of how to make a good referral are included on the website
- **Consultation Line:** Settings can contact the Children & Families Hub on 0345 603 7627 and ask for the Consultation line
- **Priority Referral:** For emergencies that require a rapid social care response only. Telephone the Children and Families Hub on 0345 6037627 and ask for the Priority Line. Requests for Support made through the Priority Line must be followed up with a [written Request for Support](#) within the given timeframe

When to consider Early Help procedures

This guidance draws upon several statutory and non-statutory documents. The Designated Safeguarding Lead (DSL) and Deputy DSL (DDSL) should read the below documents in their entirety and be familiar with them.

Document	Summary in relation to HSB	Specific pages of interest for Early Help advice
Effective Support for Children and Families in Essex (2021)	Guidance for all practitioners in working together with CYPs and families to provide early help, targeted and specialist support.	Early Help is discussed on pages 8 – 13, 20 – 22, 24 - 25
Keeping Children Safe in Education (2025)	Statutory guidance for schools and colleges on safeguarding CYPs, including information on how to handle cases of harmful sexual behaviour.	Part 1 of the guidance, as well as page 119 and 120 for the use of Early Help in HSB cases
Working Together to Safeguard Children (2023).	A guide to inter-agency working to safeguard and promote the welfare of CYP. In many incidents of harmful sexual behaviour, it will be important to engage other agencies and this document provides the framework for doing so.	'Chapter 1: Assessing Need and Providing Help' covers Early Help

[Effective Support for Children and Families in Essex \(2021\)](#) sets out the indicators of need for Level 2: accessing additional support and early help. Early Help is appropriate where the threshold for referral to a statutory agency (Police and Children's Social Care) is not met, but the CYP requires support from other services, whilst the setting manages the incident internally. Keeping Children Safe in Education recognises that Early Help may be useful for non-violent HSB and for preventing sexual violence from escalating.

The Children & Families Hub may be contacted about an incident of harmful sexual behaviour or child on child abuse, as part of the setting's response to an incident. The Children and Families Hub can provide advice and signpost to other services, to support the Early Help process. The Consultation Line at the Children & Families Hub can be contacted on 0345 603 7627.

How to contact Early Help providers in Essex

- [Early Help Drop-in sessions](#) are available in each quadrant for advice and guidance to settings
- A selection of Early Help resources, including Early Help Plan templates, can be found on the [Essex.gov.uk 'Resources for Practitioners' page](#)
- Team Around the Family Support Officers (TAFSOs) can be contacted via TAFSO@essex.gov.uk
- The Essex [directory of services](#) has the details for a vast number of services that can support CYP and families.
- The [Level 2: getting some additional support and early help page](#) provides up to date information on Early Help options in Essex

When to involve Health agencies

Settings should consider whether the CYP involved in an incident of harmful sexual behaviour / child on child abuse have any presenting health needs and whether they would benefit from a referral to a specialist health service. This may be for either the victim or alleged perpetrator for their physical, sexual or mental health.

Support for victims and survivors of sexual assault and abuse

There are several specialist services who can support CYP who have experienced sexual violence. Settings should signpost CYP to these services following an incident and support with referrals if requested. Referrals will often be in parallel with referrals to police and social care. Settings should be aware that CYP who have been abused may not be ready to access help instantly and therefore should ensure that CYP are aware of the services so they can access them when/if they feel comfortable.

Sexual Assault Referral Centre (SARC) - CYP that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all CYP and adults, regardless of when the incident occurred. Details of local SARCs can be found on the [NHS website](#).

Independent Sexual Violence Advisors (ISVAs) - Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim. In Essex, ChISVAs can be accessed via [Synergy Essex](#), a partnership of rape and sexual abuse centres in Essex (CARA and SERRIC). They deliver specialist community-based services in Essex for victims and survivors of all forms of sexual violence and abuse, sexual domestic violence, sexual harassment, and child sexual abuse.

Appendix G signposts to agencies and resources to support CYP who have experienced harmful sexual behaviour.

Support for CYP displaying harmful sexual behaviours

Settings should be aware that CYP who display harmful sexual behaviour have often experienced abuse and trauma themselves and this should be acknowledged within the response. It should also be acknowledged that displaying harmful sexual behaviour is often due to the CYP having an unmet need themselves.

Appendix G signposts to agencies and resources to support CYP who have displayed harmful sexual behaviour.

When to contact the ECC Education Access Team

The Education Access Team has responsibility for commissioning suitable education for pupils who are unable to attend school, including permanent exclusion, suspensions, alternative education, and commissioned placements at Pupil Referral Units (PRUs).

If a permanent exclusion or suspension is being considered following an incident of HSB, the ECC Education Access Team can be contacted for advice and guidance using the contact details on the [Essex Schools InfoLink Education Access page](#). A commissioned placement at a PRU may be a more positive option and can be explored by making a [Request for Support](#) to the Education Access Team. If a permanent exclusion is issued, the Education Access Team must be notified via a Permanent Exclusion Notification which can be found on the [Education Access Permanent Exclusion page](#). If a suspension is issued, the local authority must be informed without delay, regardless of the length of the suspension, by forwarding a copy of the suspension letter issued to parents to suspensions@essex.gov.uk.

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