

**Trinity School and College**



## **Peer on Peer / Child on Child Abuse Policy**

*Trinity puts children's rights at the heart of our provision in order to improve well-being and develop every child's talents and abilities to their full potential. Trinity recognises the United Nations Convention on the Rights of the Child putting it into practice within the school and beyond.*

*This policy promotes Article 19: the right to be protected from being hurt and mistreated; and Article 29: your education should help you use and develop your talents and abilities, live peacefully, protect the environment and respect other people.*

**September 2021**

# 1 Trinity responsibilities

## 1.1 Introduction

The Interim Headteacher School and College and Cavendish Governor, together with the senior leadership team and all staff (which term shall apply to all volunteer staff members) at Trinity, are committed to the prevention, early identification and appropriate management of peer on peer / child on child abuse (as defined below) both within and beyond Trinity.

At Trinity, there is zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children and young people

Trinity believe that in order to protect our children and young people, all schools and colleges should:

- a) Be aware of the nature and level of risk that their students are or may be exposed to and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context
- b) Take a whole Trinity community and Extra-Familial Safeguarding approach to preventing and responding to peer-on peer / child on child abuse, sexual violence and sexual harassment
- c) Understand that abuse may occur between peers (peer on peer abuse) or between children who are unknown to each other (child on child)
- d) Understand that abuse can take place face to face, via 3<sup>rd</sup> parties or online

Trinity regard the introduction of this policy as a preventative measure. The Interim Headteacher School and College senior leadership team and all staff do not believe it is acceptable to take a merely reactive approach to peer on peer / child on child abuse, sexual violence or sexual harassment in response to alleged incidents. The Interim Headteacher School and College, senior leadership team and all staff believe that in order to tackle peer on peer / child on child abuse proactively, it is necessary to focus on the following four areas:

- 1) Systems and structures
- 2) Prevention
- 3) Identification

#### 4) Response and intervention

Trinity recognise the national and increasing concern about this issue, and wish to implement this policy in order to mitigate harmful attitudes and peer on peer / child on child abuse from occurring in our Trinity setting. Trinity recognises the risk of Rape Culture existing within education settings and the need for a robust response to concerns alongside comprehensive education frameworks which teach healthy relationships and respect. Trinity recognises that students must be supported so that they feel able to report any incidents of peer on peer abuse, sexual violence or sexual harassment and that students must never feel that they are being judged, blamed or not believed when incidents are reported. Trinity follows guidance laid out in [Sexual violence and sexual harassment between children in schools and colleges Sept 21](#).

Trinity also recognise that peer on peer abuse may also take on the form of child on child abuse where children are not within the same peer group or associated through a setting. Where an incident has occurred outside of our setting, there is still likely to be a safeguarding response to this.

**Trinity recognises the increased vulnerability of our students, due to their special educational needs, and the need for setting specific educational tools and resources to support and educate our students. Students at Trinity may have or a combination of: autism, speech and language difficulties, dyspraxia, dyslexia or other social communication difficulties. In addition to this, the Trinity community includes a large number of Looked after Children (LAC) with a further unique set of vulnerabilities.**

Trinity wishes to encourage parents and carers to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of their peers, they should inform the School or College so that it can ensure that an appropriate action is taken in response.

Students are encouraged to report any concerns or incidents of peer on peer abuse they experience; witness or suspect are happening. Students may do this by speaking with any member of staff, who will speak to the DSL, or by emailing:

[safeguarding@trinityschoolrochester.co.uk](mailto:safeguarding@trinityschoolrochester.co.uk)

### Trinity Safeguarding Professionals

Cavendish Safeguarding Director	Stephen Aiano	Cavendish Director
Designated Safeguarding Leads	Paula Brett	Safeguarding and LAC Manager, DLACT
	Jackie Woolmer	Deputy Safeguarding and LAC Manager
	Chloe Boyle	Safeguarding and LAC Coordinator
Safeguarding DSL trained staff	Joanne Baker	Interim Headteacher School and College
	Thomas Furnell	Head of College
	Georgina Moorcroft	Head of School
	Kieren Martin	Deputy Head - School
	Hayley Furnell	Deputy Head - College
	Lynne Healy	Safeguarding Administrator
	Susan David	Assistant Deputy Head - School
	Kelly Bates	Assistant Deputy Head - College
	Michelle Male	Emotional Wellbeing Assistant - School
Safeguarding Panel	Paula Brett	Safeguarding and LAC Manager, DLACT
	Joanne Baker	Interim Headteacher School and College
	Georgina Moorcroft	Head of School

## **1.2 This Policy**

This Policy is Trinity's overarching policy for any issue that could constitute peer on peer abuse or child on child abuse. It relates to, and should be read alongside, the following Trinity Policy documents:

- Safeguarding Policy
- Accessibility Policy
- Anti-Bullying Policy
- Attendance Policy
- Behaviour Management Policy
- Child Protection Policy
- Communications Policy
- Curriculum Policy
- Complaints Policy and Procedure
- Data Protection and Confidentiality Policy - GDPR
- Exclusion Policy
- First Aid Policy
- Health and Safety Policy
- Incident Procedure
- Inclusion Policy
- Learning Outside of the Classroom Policy
- Lockdown Policy
- Medicine Policy
- Mental Health and Emotional Wellbeing Policy
- Online Safety Policy
- Parental Authorisation Documentation and Risk Assessments
- Physical Restraint and De-escalation Policy
- Preventing Extremism and Radicalisation Policy
- Safer Recruitment
- Social Networking
- Special Educational Needs Policy
- Staff Handbook: Code of Conduct, Confidentiality, Whistle Blowing, Data Protection.
- Staff Safeguarding Audit and Self Evaluation (Safeguarding and Child Protection)
- Student Voice and Peer Mentoring (Active Listening Culture)
- Safeguarding Vulnerable Adults Policy
- Sex and Relationships Policy
- Whistle blowing Policy

Many policy documents can be found on the [Trinity website](#), with all being available to read at the School or College office or can be provided in hardcopy form by email request to [office@trinityschoolrochester.co.uk](mailto:office@trinityschoolrochester.co.uk)

This Policy sets out our strategy for improving prevention and identifying and appropriately managing peer on peer abuse in all its forms. In developing this policy, we have considered:

- How responsible social media use is promoted through the curriculum
- How sex education and relationships are taught across the provision
- How equality and diversity is promoted within Trinity, through our curriculum and through interaction with the wider community locally and internationally
- How children and young people's rights are promoted and supported within the provision
- How children and young people can access support
- How risk assessments are carried out, kept relevant and information shared amongst staff
- How incidents of peer on peer abuse and child on child abuse are recorded in line with GDPR and safeguarding procedures
- How information can be shared with parents and carers about peer on peer abuse
- How the policy can be specifically tailored to the needs of our learners, including specific learner groups such as Looked After Children
- How Trinity promotes and evidences safeguarding specific training for staff, such as peer on peer abuse
- How well safeguarding procedures meet the demands and challenges set by peer on peer abuse and child on child abuse
- How student's vulnerability is impacted by national emergencies or national and global health crisis
- How student's interactions and use of social media changes during periods of home and blended learning

This policy applies to all school staff including supply, agency and volunteer staff. The policy is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which students are or may be exposed. The policy will be reviewed by the Safeguarding and LAC manager in consultation with the Interim Headteacher School and College.

**This policy recognises that abuse is abuse, and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up'.**

This policy is compliant with the statutory guidance on peer on peer abuse as set out in [Keeping Children Safe in Education 2021](#)

This policy does not use the term 'victim' and/or 'perpetrator'. This is because Trinity takes a safeguarding approach to all individuals involved in concerns or allegations about peer on peer abuse, including those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the later.

Research has shown that many children who present with harmful behaviour towards others, in the context of peer on peer abuse and child on child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to the abuse of peers.

The uses of the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18. We have chosen not to restrict our approach to peer on peer abuse under this policy to children, but to instead use a wider interpretation of our safeguarding responsibilities so that they apply to all Trinity students both in the Trinity provision. This is particularly relevant when considering the unique needs of our students. The oldest students at Trinity can be 25 years old.

Although the starting point is that the response to peer on peer abuse and child on child abuse should be the same for all students, there will be different considerations depending on the age of the student in terms of how local agencies and partners can respond. For example, responses from local authorities, given their safeguarding responses are limited to, in the cases of children's social care – save for a number of specific exceptions – to children and, in the case of adults with care and support needs. Similarly, Trinity's response to incidents involving the exchange of sexual imagery such as nudes and semi nudes will need to differ depending on the age of the students involved. There is also likely to be a more significant criminal justice response in relation to any students responsible for abuse who is aged under 18.

This policy, if relevant and according to the concern(s) or allegation(s) raised by read in conjunction with the DfE's advice on [Sexual violence and sexual harassment between children in schools and colleges Sept 2021](#) , [Sharing nudes and semi nudes: advice for education settings working with children and young people](#) and any other advice and guidance referred to within it, as appropriate.

## 2 Understanding peer-on-peer abuse

### 2.1 What is peer on peer abuse and child on child abuse?

For these purposes, peer on peer and child on abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children, within children's relationship (both intimate and non-intimate), friendships and wider peer associations. Peer on peer abuse and child on child abuse can take various forms including (but not limited to):

- Serious bullying including cyber bullying
- Relationship abuse
- Domestic violence and abuse
- Child sexual exploitation and criminal exploitation
- Youth and serious youth violence
- Harmful sexual behaviour including sexual violence
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment
- Prejudiced based violence and gender based violence
- Upskirting (Upskirting is a form of sexual harassment that normally involves taking a picture under a person's clothing without them knowing with the intention of viewing their genitals or buttocks. It often occurs in a public crowded place, making it hard for the victim to know that a photograph is being taken, victims are often distressed and feel humiliated. Upskirting is a criminal offence)
- Sharing and production of nude and semi nude images
- Initiation/ hazing type violence and rituals
- Physical abuse – hitting, kicking, shaking, biting, hair pulling or otherwise

Examples of online peer on peer abuse would include:

- Sharing and production of nude and semi nude images
- Online abuse
- Peer on peer grooming
- Distribution of youth involved sexualised content
- Harassment
  
- Coercive control of a child or young person's digital identity and digital footprint

### 2.2 Extra familial harm and wider safeguarding context

This policy encapsulates an Extra-familial approach to safeguarding, which is about changing the way that professionals approach child protection when risks occur

outside of the family, thereby requiring all those within a Local Safeguarding Partnership to consider how they work alongside, rather than just refer into, children's social care, to create safe spaces in which children may have encountered peer on peer abuse. Trinity also interacts and maintains relationships with a large number of neighbouring Local Safeguarding Partnerships, due to the locations from which learners travel to the provision daily. Where Looked after Children are involved, this can involve Local Safeguarding Partnerships from across the country.

Trinity has adopted a whole-community Extra Familial safeguarding approach which means:

- Being aware of and actively seeking to understand the influence of wider the wider social environment may be having on students
- Creating a safe culture within Trinity environment that promotes healthy relationships and attitudes to gender and sexuality by implementing policy and procedure, providing a diverse curriculum and ongoing staff training
- Ensuring stereotyped assumptions are challenged
- Being alert to changes in behaviours including attendance and learning engagement
- Challenging threshold decisions where appropriate
- Contributing to local child protection agendas
  
- Recognising that children and young people may be at risk of abuse or exploitation in situations outside of their immediate families and that this may take a variety of forms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
  
- Creating and upholding a zero tolerance approach to sexual violence and sexual harrassment

### **2.3 How to prevalent is peer on peer / child on child abuse?**

Research suggest that peer on peer / child on child abuse is one of the most common forms of abuse affecting children in the UK. For example, more than four in ten teenage girls have experienced sexual coercion. Two thirds of contact sexual abuse experienced by children aged 17 or under was committed by someone who was also aged under 17.

The June 2021 OFSTED [Review of sexual abuse in schools and colleges](#) found that in the schools visited:

*‘nearly 90% of girls, and nearly 50% of boys, said being sent explicit pictures or videos of things they did not want to see happens a lot or sometimes to them or their peers. Children and young people told us that sexual harassment occurs so frequently that it has become ‘commonplace’. For example, 92% of girls, and 74% of boys, said sexist name-calling happens a lot or sometimes to them or their peers. The frequency of these harmful sexual behaviours means that some children and young people consider them normal’*

## 2.4 When does behaviour become problematic or abusive?

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

## 2.5 Sexual behaviours

Simon Hackett has proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a student’s sexual behaviour and deciding how to respond to it.

Hackett’s continuum relates exclusively to sexual behaviours and is not exhaustive. [The Brook Sexual Behaviours Traffic Light Tool](#) can help professionals working with children to distinguish between three levels of behaviour – green, amber, red, and to respond according to the level of concern

[Simon Hackett’s Sexual behaviours continuum model](#)

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviour	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Socially acceptable behaviour within peer group	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure compliance	Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour
Shared decision making		Consent issues may be unclear	Intrusive	Sadism
		May lack reciprocity or equal power	Informed consent lacking or not able to be freely given	
			May include element of	

		May include levels of compulsivity	expressive violence	
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## 2.6 Other behaviour

When dealing with other alleged behaviour of which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and decide how to respond. This could include, for example, whether it:

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

## 2.7 How can a child who is being abused by their peers, or an unconnected child, be identified?

All staff should be alert to the well-being of students and to sign of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer on peer abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ. In addition, all staff at Trinity must be aware of the impact SEND has on disclosures and behaviours presented.

At Trinity, the safeguarding team (Appendix C) regularly review behaviour and incident reports which can help identify any changes in behaviour and/or concerning patterns or trends at an early stage. Weekly SARP (Safeguarding and Reflective Practice) meetings are held between the Safeguarding and LAC manager and the Safeguarding coordinators to discuss current cases. This is in addition to termly

whole safeguarding team meetings which span the Trinity provision. Changes in academic progress and academic engagement are also discussed as further indicators of behaviour changes. This is in line with Keeping Children Safe in Education 2020 which lays out the requirement for DSLs to consider academic impact in safeguarding assessment and to take action to improve the academic outcomes of those impacted by safeguarding issues.

### **Behaviour change case study for illustrative purposes – Not from Trinity**

A 15 year old girl starts to exhibit challenging behaviour in class which is out of character. She starts to have disagreements with the girls in her class and a number of 'friendship issues' are reported to the teachers. The school moves the girl to another class, changes her timetable so that she does not have to interact with the girl in question, and provides her with a mentor.

A few months later the girl throws a chair across the classroom. The girl is sent to the head teacher who calls her parents and temporarily excludes the girl from school. The pastoral lead discusses the incident with the lead teacher, explaining that the behaviour is completely out of character for the girl, and that the school should explore the matter further. The pastoral lead sits down with the girl and asks her how she is. The girl discloses that her boyfriend is being physically violent and verbally abusive towards her.

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

At Trinity, we recognise that any child can be vulnerable to peer on peer abuse due to the strength of peer influence during adolescence and staff should be alert to the signs of such abuse amongst all children. At Trinity, we recognise that children with Special Educational Needs and/or disabilities (SEND) are three times more likely to be abused than their peers without SEND, and additional barriers can sometimes exist when recognising abuse in children with SEND. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration
- The potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs
- Communication barriers and difficulties
- Being able to overcome communication barriers

- Dangerous assumptions that behaviour is due to SEND leading to a culture of ‘they just don’t understand what they are doing’ implying that there is no part to play in safeguarding the child or young person and their peers through education
- Poor access to appropriate Sex and relationships education suitable for the students SEND needs

Trinity also recognise that all our students have increased vulnerability to abuse, due to their SEND, and that this vulnerability increases when considering our most vulnerable learner group – Looked After Children.

Other individual and situational factors can increase a child’s vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to peer on peer / child on child abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family.

Staff at trinity also have a major role to play in modelling respect and appropriate behaviours.

Peer group dynamics can also play an important role in determining a child’s vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to peer on peer abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers or children and young people within their local community.

Research suggests that peer on peer / child on child abuse may affect boys differently from girls, and that difference may result for societal norms, (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make up. Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics or peer on peer abuse within their settings, and recognise that these will play out differently in single sex, mixed or gender- imbalanced environments. Schools and colleges also need to consider how boys may be viewed within their local community and the impact this may have on child on child abuse prevalence.

Some children may be more likely to experience peer on peer / child on child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

## 3 A whole school approach

### 3.1 School environment

Trinity actively seeks to raise awareness of and prevent all forms of peer on peer / child on child abuse by educating all staff, volunteers and parents about this issue. This includes training on the nature, prevalence and effect of peer on peer abuse, and how to prevent, identify and respond to it. This includes:

- Extra Familial safeguarding
- The identification and classification of specific behaviours, including digital behaviours
- The importance of taking seriously all forms of peer on peer / child on child abuse (no matter how 'low level' they may appear) and ensuring that no form of peer on peer / child on child abuse is ever dismissed as horseplay or teasing
- Social media and online safety, including how to encourage children to use social media in a positive, responsible and safe way, and how to enable them to identify and manage abusive behaviour online
- Considering own conduct, attitudes and language
- Maintaining a zero tolerance approach

Trinity actively seeks to raise awareness of and prevent all forms of peer on peer / child on child abuse by educating children about the nature and prevalence of peer on peer abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent via PSD, RHSE and the wider curriculum. For example, by addressing discrimination through The Anne Frank Ambassador programme, or by reviewing literature in an English class which addresses bullying and its effects on mental health. Students also study within the SPHERE programme as detailed in the Safeguarding Policy. Students are frequently told what to do if they witness or experience such abuse, the effect of that it can have on those who experience it and the possible reasons for it, including the vulnerability of those who inflict such abuse. This is achieved through focus days such as mental health awareness, online safety and well-being days for example. Students are taught how to access help and support including through the [bullying@trinityschoolrochester.co.uk](mailto:bullying@trinityschoolrochester.co.uk) and [ewb@trinityschoolrochester.co.uk](mailto:ewb@trinityschoolrochester.co.uk) email addresses.

Students, parents and carers are regularly informed about the Trinity's approach to such issues, including its zero tolerance policy towards all forms of peer on peer / child on child abuse. Educating students about consent includes teaching them the basic facts such as:

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape

Trinity encourages parents to hold it to account on this issue, in part as a result of the visibility of this policy.

Trinity support the ongoing welfare of students by drawing on multiple resources that prioritise student mental health, and by providing emotional wellbeing support. All staff are trained to meet low-level mental health difficulties having completed or in the progress of completing a Level 2 qualification in Mental Health Awareness. Many staff have progressed to Level 3 Mental Health Awareness and counselling qualification. Keeping Children Safe in Education 202 stresses the importance that all staff make the link between mental health and safeguarding.

The Interim Headteacher School and College, Head of School, Head of College and senior leadership team, all staff and volunteers are actively encouraged to address inequality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community.

The Interim Headteacher School and College, Head of School, Head of College, safeguarding team, all staff and volunteers are committed to creating a school community in which our students can aspire to, and realise, safe and healthy relationships by fostering a whole school culture:

- Which is founded on the idea that every member of the Trinity community is responsible for building and maintaining safe and positive relationships, and helping to create a safe Trinity environment in which violence and abuse are never acceptable
- In which students are able to develop trusting relationships with staff, and in which staff understand, through regular discussion and training, the importance of these relationships in providing students with a sense of belonging, which could otherwise be sought in problematic contexts
- In which students feel able to share their concerns openly, in a non-judgemental environment, and have them listened to
- Which proactively identifies qualities in students; nurtures these qualities; teaches and encouraged students to think about positive hopes for the future and supports students in developing small-scale goals that enable realistic ambitions
- Which provides supervised activities to students that give them the experience of having their needs met that might otherwise apparently be met in abusive circumstances. This might include experiencing status, excitement and a degree of risk

- Where cases of peer on peer / child on child abuse are responded to promptly
- That ensures all peer on peer / child on child abuse issues are managed by the safeguarding team so that they are able to spot and address any concerning trends and identify students that may be in need of additional support. Weekly meetings are held between the Safeguarding and LAC managers to discuss recent cases. Information is then disseminated to the wider safeguarding team as necessary. This is in addition to monthly whole safeguarding team meetings spanning both the educational provision.
- Where behaviours, language and attitudes could be described as Rape Culture are routinely and robustly challenged
- Where students have access to information, challenge and experience within the curriculum in order to develop skills for life and good citizenship.

### **3.2 Multi-agency working**

Trinity actively engages with its Local Safeguarding Partnership in relation to peer on peer / child on child abuse, and works closely with, for example, children's social care, the police, Medway Multi Agency Specialist Hub (MASH) and other local schools (Appendix B). Links are also maintained with Local Safeguarding Partnerships in neighbouring local authorities due to the wide geographical area from which students travel to Trinity educational provisions daily.

The relationships that Trinity has built with these partners are essential to ensuring the Trinity is able to prevent, identify early and appropriately handle cases of peer on peer / child on child abuse. They help Trinity to:

- Develop a good awareness and understanding of the different referral pathways that operate in each local area, as well as the preventative support and support services which exist
- Ensure that students are able to access the range of services and support they need quickly
- Support and help inform the Trinity's local community's response to peer on peer / child on child abuse
- Increase the School's awareness and understanding of any concerning trends and emerging risks in its local area and beyond to enable it to take preventative action to minimise the risk of these being experienced by its students

Trinity actively refers concerns and allegations of peer on peer abuse where necessary to children's social care, the police Medway Multi Agency Specialist Hub and/or any other relevant agencies in accordance with the Local Safeguarding Partnership's procedures. It should be noted that where students attend Trinity from

other local authorities, such cases of peer on peer / child on child abuse will be referred to the local authority MASH where the student resides. Trinity therefore has a large number of relationships with different agencies and MASH teams.

Where concerns arise surrounding peer on peer / child on child abuse, a signs of safety mapping and planning form will be completed by the safeguarding team to help identify safeguarding actions and reduce risks for the school and college community (Appendix E). Due to the complex nature of peer on peer / child on child abuse, Trinity are likely to engage many different agencies when dealing with peer abuse that can't be managed appropriately within the Trinity itself. This is particularly true of our provision where learners have SEND and therefore often need specialist support and intervention. Situations where there is an imbalance of power may be more readily experienced where SEND learners are involved.

## 4 Responding to concerns or allegations of peer on peer / child on child abuse

### 4.1 General principles

It is essential that all concerns and allegations of peer on peer / child on child abuse are handled sensitively, appropriately and promptly and that students who report incidents of peer on peer abuse, sexual violence or sexual harassment always feel listened to and that they are not being blamed or judged. The way in which they are responded to can have a significant impact on the school environment.

Any response should:

- Include an investigation of the concern(s) or allegation(s) and the wider context in which it/they may have occurred as appropriate. Depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation
- Treat all children involved as being at potential risk – while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. Trinity will ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it
- Take into account that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider sociocultural contexts – such as the child's/children's peer group (both within and outside Trinity), family, their experience(s) of crime and victimisation in the local community, and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child/children's needs and to mitigate risk
- Consider the potential complexity of peer on peer / child on child abuse and of children's experiences, and consider the interplay between power, choice and consent. While children may appear to be making choices, if these choices are limited they are not consenting
- Consider the views of the child/children affected. Unless it is considered unsafe to do so (for example where a referral needs to be made immediately), the Designated Safeguarding Lead should discuss the proposed action with the child/ children and their parents and obtain consent to any referral before it is made. Trinity should manage the child/children's expectations about information sharing and keep them and their parents informed of developments where appropriate and safe to do so. It is particularly important to take into account the wishes of any child who has allegedly been abused and to give that child as much control as it is

reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

**What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peers(s)?**

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s) or other children, or that a child may be at risk of abusing their peer(s) or other children, they should discuss their concern with the Safeguarding and LAC manager without delay (in accordance with Trinity School and College's Safeguarding and Adult Safeguarding Vulnerable Adults Policy) so that a course of action can be agreed.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care or adult social care (or if appropriate the Police) is made immediately.

Anyone can make a referral however it is out policy, that this should only be done where the Safeguarding team are not available. Where a referral is made but not by the Safeguarding team, the Safeguarding and LAC manager must be informed as soon as possible that a referral has been made.

If a child speaks to a member of staff about peer on peer / child on child abuse that they have witness or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. For further information and guidance, please see Trinity's Child Protection and Safeguarding Policy.

**4.2 How should the School respond to concerns or allegations of peer on peer / child on child abuse?**

The Safeguarding and LAC manager will discuss the concern(s) or allegation(s) with the member of staff who has reported it/the, and will, where necessary, take any immediate steps to ensure the safety of the child/children affected. The Safeguarding team work collaboratively in taking action and will use each other's professional judgement to make decisions and challenge decisions where appropriate.

Where any concern(s) or allegation(s) indicate(s) that indecent images of a child or children may have been shared online, the Safeguarding and LAC should consider what urgent action can be taken in addition to the actions and referral duties set out in this policy, and in the School's Safeguarding Policy. Specialist advice will be

sought from external agencies to prevent the images spreading further and removing them from the internet where possible.

Specialist advice may be sought from The Internet Watch Foundation (IWF), for example, who have a trained team that can evaluate and remove illegal images from the internet when the images are reported to them quickly. They will also share the image with the National Crime Agency's CEOP Command to facilitate an investigation. Any report to IWF will be made in consultation with the police.

Trinity's Safeguarding Team will always use their professional judgement and work collaboratively to:

- a) Assess the nature and seriousness of the alleged behaviour
- b) Determine whether it is appropriate for the alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required (Appendix E).

In borderline cases the Safeguarding Team may wish to consult with:

- Children's social care and/or adult safeguarding teams in accordance with the Local Safeguarding Partnership procedures in the Local Authority where that child lives
- External agencies
- The Police
  
- The Safeguarding Panel at Trinity

Where the Safeguarding Team considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual child/children in question might otherwise require it, the Safeguarding team will contact children's social care, adult social care and/or the Police immediately. Within 24 hours of the Safeguarding team becoming aware of alleged behaviour, and after seeking appropriate advice, the Safeguarding team will agree in a course of action to take which may include:

**A** Managing the alleged incident internally with help from external specialists where appropriate and possible.

Where the alleged behaviour between peers is abusive or violent (as opposed to inappropriate or problematic – unless as stated above), steps B, C or D should ordinarily apply. However, where support from local agencies is not available, Trinity may need to handle concerns or allegations internally. In these cases, Trinity will engage and seek advice from external specialists (either in the private and/or voluntary sector).

**B** Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of the child/children and their family.

These services may, for example, include family and parenting programmes, responses to emerging thematic concerns in extra familial contexts, a specialist harmful sexual behaviour team, CAMHS and/or youth offending services.

**C** Refer the child/children to children's social care for a section 17/47 statutory assessment.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, a report to the police) is made immediately. This referral will be made to children's social care in the area where the/each child lives.

Depending on the safeguarding procedures issued by the Local Safeguarding Partnership in that area, there will normally be an initial review and assessment of the referral, in accordance with that area's assessment framework. As a matter of best practice, if an incident of peer-on-peer abuse requires referral to and action by children's social care and a strategy meeting is convened, then Trinity will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the/each child who has experienced the abuse, and the/each child who was responsible for it, and the contexts to which the abuse was associated.

**D** Report alleged criminal behaviour to the police.

Alleged criminal behaviour will ordinarily be reported to the police. However, there are some circumstances where it may not be appropriate to report such behaviour to the police. For example, where the exchange of youth involved sexual imagery such as nudes and semi nudes does not involve any aggravating factors. All concerns or allegations will be assessed on a case by case basis, and in light of the wider context.

### **4.3 Safety plans**

The School will always carry out a safety plan (appendix E) in respect of:

- Any child who is alleged to have behaved in a way that is considered to be abusive or violent
- Any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child

- Any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the Safeguarding Team

Where it is alleged that a child has behaved in a way that is considered to be inappropriate or problematic (as opposed to abusive or violent), the Safeguarding team will use their professional judgment – based on the particular concern(s) and/or allegation(s) raised, and the needs and circumstances of the individual child/children in question – to determine whether (as explained above) it would be appropriate to contact children’s social care, and to carry out a safety plan or contact adult social care.

Careful judgment and consideration are required as to whether alleged behaviour which might be judged to be inappropriate by an adult might actually be harmful to another child. Consultation is recommended with children’s social care and adult social care if there is any doubt about this.

Careful consideration should also be given to a range of factors (which are outlined in Appendix A) including the context, severity of the alleged behaviour, impact of the alleged behaviour on others, risk to others, and whether there are any patterns of behaviour occurring. Trinity will also carry out an individual risk assessment review for all individual as part of the review of the case.

Where other children have been identified as witnesses to alleged abuse or violence, consideration should also be given by the Safeguarding team to whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them.

#### **4.4 Information sharing, data protection and record keeping**

When responding to concern(s) or allegation(s) of peer-on-peer abuse, the Trinity will:

- Always consider carefully, in consultation with children’s social care, the police and other relevant agencies (where they are involved), how to share information about the concern(s) or allegation(s) with the student(s) affected, their parents, staff, and other students and individuals
- Record the information that is necessary for Trinity and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) and safeguard everyone involved
- Keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose

- Be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in [Working Together to Safeguard Children 2018](#) and the [HM Government advice on Information Sharing July 2018](#)

## **4.5 Disciplinary action**

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

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

- a) Ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour
- b) Demonstrate to the child/children and others that peer-on-peer / child on child abuse can never be tolerated
- c) Ensure the safety and wellbeing of other children.

However, these considerations must be balanced against any police investigations, the child's/children's own potential unmet needs, and any action or intervention planned regarding safeguarding concerns. Before deciding on appropriate action Trinity will always consider its duty to safeguard all children in its care from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the peer-on-peer / child on child abuse and the causes of it.

The School will, where appropriate, consider the potential benefit, as well as challenge, of using and end of placement as a response, and not as an intervention, recognizing that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required.

For example, action may still need to be taken by Trinity in relation to other students who have been involved with and/or affected by peer-on-peer / child on child abuse. Exclusion or end of placement will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the Trinity.

Disciplinary interventions alone are rarely able to solve issues of peer-on-peer / child on child abuse, and Trinity will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

## **4.6 On-going proactive work for a whole-school community**

### **Contextual Safeguarding approach**

Trinity's response to concerns or allegations of peer-on-peer abuse is part of on-going proactive work by Trinity to embed best practice and in taking a whole-educational community approach (defined above) to such abuse.

As such, the Trinity's response is part of its wider prevention work.

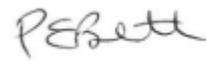
This response may involve Trinity working with the local authority to undertake, for example, a Safeguarding school assessment which would fit into a systems approach to Contextual and Extra Familial Safeguarding. The response could also include the Trinity asking itself a series of questions about the context in which an incident of peer-on-peer / child on child abuse occurred in Trinity, the local community in which Trinity is based, and the wider physical and online environment – such as:

- What protective factors and influences exist within Trinity (such as positive peer influences, examples where peer-on-peer abuse has been challenged, etc.) and how can Trinity bolster these?
- How (if at all) did the Trinity's physical environment or the students' routes to and from Trinity, such as taxis, contribute to the abuse, and how can Trinity address this going forward. For, by improving the Trinity's safety, security and supervision, or by working with local safeguarding partners to mitigate the risks to students' safety whilst travelling to and from Trinity?
- How (if at all) did the online environment contribute to the abuse, and how can the Trinity address this going forwards, for example by strengthening the way in which Trinity encourages positive and safe use of the internet by students?
- Did wider gender norms, equality issues, and/or societal attitudes contribute to the abuse?
- What was the relationship between the abuse and the cultural norms between staff and students, and how can these be addressed going forward?
- Does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse, or to address any victim-blaming narratives from staff?
- How have similar cases been managed in the past and what effect has this had?
- Does the case or any identified trends highlight areas for development in the way in which Trinity works with children to raise their awareness of and/or prevent peer-on-peer abuse, including by way of Trinity's curriculum and lessons that address underlying attitudes or behaviour such as gender and

equalities work, respect, boundaries, consent, children's rights and critical thinking and/or avoiding victim-blaming narratives?

- Are there any lessons to be learnt about the way in which Trinity engages with parents to address peer-on-peer abuse issues?
- Are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?
- Does this case highlight a need to work with certain children to build their confidence, and teach them how to identify and manage abusive behaviour?
- Were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in Trinity?

Answers to these questions will be developed into an action plan that is reviewed on a regular basis by the Trinity's Leadership and the Safeguarding Team. Trinity will, where possible and appropriate, work with the local authority and wider partners to deliver on this plan, possibly as part of a wider Extra Familial assessment led by or with input from the local authority.



Paula Brett, DSL, Safeguarding and LAC Manager

**Date: September 2021**

**Review Date: September 2022**

**Reviewed: May 2022**

Joanne Baker, Interim Headteacher, School and College

## Appendix A: Further Information

### What is peer-on-peer / child on child abuse?

Different types of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, sexual bullying in schools and other settings can result in the sexual exploitation of children by their peers. For 16 and 17 year olds who are in abusive relationships, what may appear to be a case of domestic violence may also involve sexual exploitation or coercion. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives, and to spaces in which they spend their time. Any response to concerns or allegations of peer-on-peer / child on child abuse therefore needs to consider the range of possible types of peer-on-peer abuse set out in a school's peer-on-peer abuse policy, and to capture the full context of children's experiences. This can be done by adopting a Contextual Safeguarding approach and by ensuring that Trinity's response to alleged incidents of peer-on-peer abuse takes into account any potential complexity.

### What is Extra Familial?

Extra Familial Safeguarding is about changing the way that professionals approach child protection when risks occur outside of the family, thereby requiring all those within a Local Safeguarding Partnership to consider how they work alongside, rather than just refer into, children's social care, to create safe spaces in which children may have encountered peer-on-peer abuse. In addition, it:

- Is an approach to safeguarding children that recognises their experiences of significant harm in extra-familial contexts, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities
- Recognises that as children enter adolescence they spend increasing amounts of time outside of the home in public environments (including those online) within which they may experience abuse
- Considers interventions to change the systems or social conditions of the environments in which abuse has occurred. For example, rather than move a child from a school, professionals could work with the school leadership and student body to challenge harmful, gendered school cultures, thus improving the pre-existing school environment

# Identifying and assessing behaviour

## Sexual Behaviour

As the NSPCC explains 'children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour. As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is harmful sexual behaviours or HSB.'

Harmful sexual behaviours are defined as 'Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult.'

Staff should always use their professional judgment and discuss any concerns with the Safeguarding Team. Where an alleged incident involves a report of harmful sexual behaviour, staff should consult the DfE's Advice.

## Other behaviour

When drawing on Hackett's continuum, in order to assess the seriousness of other (i.e. non-sexual) alleged behaviour, it should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider. For example, the issue of consent and the nuances around it, are unlikely to apply in the same way in cases where the alleged behaviour is reported to involve emotional and/or physical abuse, as it could in cases of alleged sexual behaviour which is reported to involve harmful sexual behaviour.

In addition, schools could be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional, physical behaviour and digital behaviour.

It should also be recognised that the same behaviour presented by different children may be understood at different points on a spectrum, depending on the particular context. For example, an incident involving youth involved sexual imagery may be inappropriate in one context, for example, when exchanged between two 11 year old children in a consenting relationship, and abusive in another. For example, when it is (a) shared without the consent of the child in the image; (b) produced as a result of coercion; or (c) used to pressure the child into engaging in other sexual behaviours. A child's unique SEND profile and other developmental needs must also be

considered when dealing with issues of behaviour especially where there is an imbalance of power based on SEND and developmental needs.

Behaviour which starts out as inappropriate may escalate to being problematic and then abusive, either quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital, and could potentially prevent their behaviour from progressing on a continuum to becoming problematic, abusive and/or violent – and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies. For example, a physical fight between two children may not constitute peer-on-peer abuse where the fight is a one-off incident, but may be abusive where the child's/children's behaviour subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership – including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child.

The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual student basis, but could also apply to a cohort of the student body, such as a key stage, or across the student body as a whole.

Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which schools and colleges need to take a whole-educational provision approaches in order to prevent escalation. For example, where multiple boys are making inappropriate comments about girls, one-off sanctions are unlikely to be effective and wider actions should be considered, such as implementing a bystander intervention model throughout the school, or arranging for an external person to deliver a key stage intervention exercise; revising the school's curriculum and/or a discussion around whether anything is happening within the wider community that might be affecting the students' behaviour.

It will also be important to consider the wider context in which the alleged behaviour is reported to have occurred, and which may trigger the need for a referral. For example, some behaviour that is considered inappropriate may be capable of being dealt with internally. However, if there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject to the concern(s)/ allegation(s) is considered or suspected by the Safeguarding Team to constitute peer-on-peer abuse, schools and colleges should follow procedures as set out in their Peer on peer abuse policy.

**How can a child who is being abused by their peers or other children be identified?**

Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse and can include:

- Failing to attend school, disengaging from learning
- Struggling to carry out school related tasks to the standard ordinarily expected
- Physical injuries
- Experiencing difficulties with mental health and/or emotional wellbeing
- Becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much
- Broader changes in behaviour including alcohol or substance misuse
- Changes in appearance and/or starting to act in a way that is not appropriate for the child's age
- Abusive behaviour towards others

Abuse affects children very differently. The above list is by no means exhaustive, and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances.

Rather than checking behaviour against a list, staff should be trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour and, where appropriate, to engage with their parents so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards.

The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of peer-on-peer abuse a power imbalance will exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

## **Safety plans**

In deciding (a) whether a safety plan would be appropriate; and (b) which children require a safety plan, the Safeguarding team should consider:

- The extent to which a child may have experienced or otherwise been affected by the alleged behaviour, and the impact on them. This will depend not only on the child's involvement in or proximity to the alleged behaviour, but also on factors such as their possible wider circumstances and needs, their age and understanding, and the extent to which the alleged behaviour might trouble or distress other children, or expose them to inappropriate sexual behaviour,
- The importance of early intervention to address and to prevent escalation of inappropriate and/or problematic behaviours
- Whether there are any wider safeguarding concerns about a child – for example, where a child's behaviour may be considered to be inappropriate or problematic on Hackett's continuum, or at risk of escalating, the Safeguarding team and/or external agencies may determine that a safety plan is required to control emerging risks.

In all cases where a safety plan is not considered to be appropriate, the school should nonetheless take steps to safeguard and support the/each child who is allegedly responsible for the behaviour, and any children affected by it, and should continue to monitor the situation. If risks increase consideration should again be given to developing a safety plan. A safety plan should be developed in consultation with key statutory agencies to whom any referral and/or report is necessary.

In developing a safety plan the school should:

- Always have regard to [Keeping Children Safe in Education 2021](#) and Working Together to Safeguard Children (July 2018), and make a referral to children's social care and, if appropriate, report to the police, whenever a child has been harmed, is at risk of harm, or is in immediate danger. Where a report of rape, assault by penetration or sexual assault is made, this must be reported to the police. Whenever a referral is made to children's social care and/or a report to the police, the school should inform children's social care and/or the police of the school's need to have a safety plan. Careful liaison with children's social care and/or the police should help the school to develop any such plan
- Consult children's social care, adult social care and/or local MASH (or equivalent), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures (where the child lives) regarding the concern(s) or allegation(s) and need to have a safety plan, and seek their agreement to the plan whenever possible
- Consult the police, where they are involved, to seek advice, and agreement whenever possible, on the safety plan, and ensure that the safety plan does not prejudice any criminal investigation(s), and that it protects all children involved in any such investigation(s) to the greatest extent possible

- If an agency is not, for whatever reason, engaging, then the Trinity should advise the agency that it intends to develop a safety plan for the/each child concerned. Trinity should also consider escalating their referral if they believe children's social care, adult social care and/or the police should be engaged. The school should share its safety plan with children's social care and the police where they are involved. The safety plan should be consistent with any risk assessments or plans made by children's social care, the police, or any other professionals working with the child
- Give consideration to consulting and involving the/ each child and their parents about the development of their safety plan, in accordance with any given by children's social care and/or the police. Where a report has been made to the police, Trinity should consult the police, and agree what information can be disclosed to the/each child who is allegedly responsible for the behaviour and their parents. There may be other circumstances where there are legitimate obstacles presented to parental knowledge/engagement – for example, if there is a suggestion or concern that informing the parents will put the/any child at additional risk; in these cases the school should work closely with children's social care and/or the police to take advice on how best to proceed
- A safety planning meeting may be helpful to develop the safety plan. Where such a meeting is to be held, careful consideration will need to be given to whether the child presenting the alleged behaviour, and/or their parents should attend. Where a child or parent does not attend, their wishes and feelings should still be sought in relation to any proposed safety plan in advance of the meeting by a professional – in the case of the child, with a designated trusted professional with whom he/she has a positive relationship. A version of the plan which is appropriate for the child's age and level of understanding should be provided to the child and their parents. Efforts should also be made to ensure that they understand what is proposed and to seek their agreement to the arrangements.

These steps will help to ensure that the safety plan is appropriately tailored to the/each child's needs and will enable the school to work with others in an effort to meet these needs in the longer-term.

A safety plan should:

- Be proportionate and not stigmatise the child/ children allegedly responsible for or affected by the behaviour,
- Set out relevant background information – including an overview of the context, the specific concern(s) or allegation(s), any relevant detail about the relationships, and any power differentials between the child/children allegedly responsible for the behaviour, and any children affected by it, the frequency of

the alleged behaviour and any changes in it over time. Details should also be shared of action taken regarding the alleged concern(s) or allegation(s), and any advice provided by children's social care, and/or local MASH (or equivalent), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures, and/or the police, and/or any other professional(s) working with the child/children,

- Set out any relevant information regarding the child/children concerned. For example, any relevant medical information, any previous concerns about the child's/children's behaviour, needs or harm that the child/children may have been exposed to in the past. Information should be shared on their wishes and feelings regarding the proposed safety plan. Consideration may need to be given to having two or more separate but aligned safety plans for the child who is allegedly responsible for the behaviour, and the child or children affected by it
- identify and assess the nature and level of risk that is posed and/or faced by the child/children in school such as that which may arise in relation to locations, activities, contact with particular students, or transport arrangements to and from school; and contexts outside the school, including at home, in relationships with friends, peer groups, interactions in the neighbourhood and/or during online activity
- Set out the steps and controls that can be put in place to reduce or manage any risk. Issues that may be addressed include:
  1. How safety will be ensured in the classroom, out of the classroom, on transport, and during unstructured or extra-curricular activities, including trips and residential stays away from school. This may involve separating the child/children who present risk from other children who may be affected by the alleged peer-on-peer abuse
  2. How to ensure that the child/children reportedly affected by the alleged behaviour feel(s) supported, including by appointing a trusted member of staff (a 'critical friend') with whom they can speak if they have existing concerns or if there are any future developments which cause them concern,
  3. How best to draw on any other trusting relationships where these exist, and create them where they do not, to provide the children concerned with support and a sense of belonging,
  4. Where relevant, how to manage the child's/children's behaviour – this can be done in a number of ways including, for example, by way of a de-escalation plan for staff which identifies any triggers, explains how their behaviour can escalate, sets out the function of the behaviour for the child /children, and proposes an appropriate action or response to it; identifying language that should be used

and avoided; a positive handling plan; or implementing controls and measures to reduce or manage any risk,

5. Whether restorative action would be appropriate and, if so, how best to take such action, bearing in mind the specific needs of the child/children concerned, and the appropriateness of any such action given the nature and seriousness of the concern(s) or allegation(s). Advice should be taken from children's social care, specialist sexual violence services, and the police where they are involved (if so, proposed restorative action could otherwise jeopardise a police investigation),
  6. Whether any targeted interventions are needed to address the underlying attitudes or behaviour of the child/children, any emotional and behavioural disorders, developmental disorders, or learning difficulties, and/or to meet the child's/ children's psychological, emotional or physical needs; drawing on local statutory, private and/ or voluntary services as appropriate, and
  7. Whether the behaviour is of such high risk that suitable controls cannot be put in place within the school setting which would enable it to be adequately managed. In this case consideration will need to be given to alternative plans for the child/children presenting the alleged behaviour. The principle that any child who is reported to have experienced peer-on-peer abuse should not have restrictions or controls placed on them as a result of another child's alleged behaviour should be given priority consideration.
- Identify and consider how to build on strengths and positive aspects that the/each child possesses and/or is exposed to, such as those emanating from activities or lessons that the child enjoys and engages with; positive characteristics and skills that the child possesses; and/or trusting relationships with the child's family, other students or staff,
  - Assess any risks that are posed and/or faced by the wider school community (including all other students and, where appropriate, staff and parents) and identify any steps that the school can take to mitigate these risks. This may include:
    1. Consideration of how to support any students (and, where appropriate, staff and parents) who know about and/or may be affected by the alleged behaviour, and/or who may be required to participate in any investigation(s) – where these students have their own standalone safety plan, they should cross refer to and be consistent (where appropriate) with one another
    2. Consideration of work that can be undertaken with the wider staff or student population to help to protect children against peer-on-peer abuse in the future. Careful consideration will need to be given to

managing confidentiality for children affected by the alleged behaviour or engaged themselves in any such behaviour.

- Set out the steps needed to implement the safety plan, including how to communicate with and what information should be shared with relevant staff members – in the strictest confidence – so that they are able to implement the actions set out in the plan and safeguard the children concerned appropriately
- Be reviewed at regular intervals, or if there is a change in perceived risks or circumstances. Reviews should be carried out in light of the children's ongoing needs to ensure that real progress is being made which benefits the children concerned.

If at any stage the risk increases, there is a further alleged incident, or any individual child's needs escalate, the Safeguarding team should contact children's social care, and/or local MASH (or equivalent), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures where that child lives, to determine the appropriate course of action. In the event that any new information is disclosed at any time indicating a child may have been harmed, is at risk of harm, or is in immediate danger, the school should again follow local safeguarding procedures in line in with [Keeping Children Safe in Education 2021](#) and Working Together to Safeguard Children (July 2018), and make a new referral to children's social care and, if appropriate, report to the police. Similarly, any new information disclosed at any time regarding alleged rape, assault by penetration or sexual assault must always be shared with the police.

### **Rape Culture**

Trinity School and College recognises the term Rape Culture as an environment in which rape is prevalent and in which sexual violence against women is normalised and excused in the media and popular culture. Trinity School and College recognise that Rape Culture is perpetuated through the use of misogynistic language, the objectification of women's bodies, and the glamorisation of sexual violence, thereby creating a society that disregards women's rights and safety.

Trinity School and College will not tolerate any behaviour which is deemed to promote Rape Culture and will take action against it inline with the Behavioural Policy. This action is also likely to include steps, as set out in the Peer on Peer/ Child on Child Policy such as; safety plans, referrals to local safeguarding partnerships, the Police and any other associated safeguarding responses which are appropriate to the individual case. Appropriate safeguarding responses will include responses both for the individual who has experienced and reported Rape Culture and for the individual who has displayed behaviours which are identified as those of Rape Culture.

Trinity School and College recognises those who have experienced Rape Culture may require ongoing emotional wellbeing and mental health support and that these

needs may change or emerge as the individual matures. Trinity School and College will ensure emotional wellbeing and mental health support is in place, which may include seeking a referral to support services such as CAMHS/NELFT, Family Matters or the NSPCC for example.

The NSPCC Rape Culture advice and support line can be used to access support for those who have experienced Rape Culture as well as to access advice for professionals.

### **Dedicated NSPCC helpline 0800 136 663**

Trinity School and College actively seeks to educate against Rape Culture through Sex and Relationships Curriculum content as detailed in the Relationships and Sex Education Policy.

It is an expectation that all staff identify and report all incidents, or suspected incidents, which could be classified as part of Rape Culture to the safeguarding team immediately. Should a member of staff have reason to believe or feel that their report has not been acted upon, it is an expectation that the member of staff escalates the issue to the Safeguarding and LAC Manager, Interim Headteacher School and College or follow the whistleblowing procedure as appropriate. It is an expectation, discussed within the Staff Code of Conduct, that all staff behave in such a way whereby they act as role models for students through their behaviour, interactions with staff and students alike and through the promotion of a safe and respectful Trinity learning community.

All staff have completed Rape Culture awareness training in April 2021 and completed a questionnaire as evidence of understanding.

### **Sexual Harassment and Sexual Violence**

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

Children who are victims of sexual violence and sexual harassment wherever it happens, 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 or college. The impact of experiencing sexual violence and sexual harassment can be significant and long lasting. Victims may require a package of support over time which is reassessed and adapted as the victim matures and needs change.

All victims must be 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.

Similarly, perpetrators of sexual violence and sexual harassment must not be seen simply as perpetrators. It is likely that a child or young person who abuses a peer may be being abused or exploited themselves. As with all safeguarding cases, the wider context and possibility of extra familial harm must be assessed.

Trinity's Peer on Peer / Child on Child Abuse, Child Protection and Behaviour policy must be read in conjunction with this policy as well as government guidance [Sexual Violence and Sexual Harassment between children in schools and colleges](#).

As stated within Trinity's Peer on Peer / Child on Child Abuse Policy, the management of reports of sexual violence and sexual harassment is likely to involve an assessment of risk of future harm, consultation and referral with safeguarding partners including the Police and may invoke a response in line with Trinity's behaviour Policy.

All staff have a responsibility to report any concerns about sexual violence, sexual harassment or peer on peer abuse they have witnessed, heard students or staff talking about or any situations where they suspect abuse has taken place. Staff must not assume that other members of staff will have reported the issue. All staff have a responsibility as education professionals in a position of trust and in line with the staff code of conduct to model appropriate behaviours and attitudes in the workplace and within their personal lives.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, Trinity will consider whether any disciplinary action is appropriate against the individual who made it in line with the behaviour policy

## Appendix B: Local Safeguarding Partnership contacts

Medway Safeguarding Children Partnership contact details:

### General enquiries

Telephone: 01634 336 329

Email: [mscp@medway.gov.uk](mailto:mscp@medway.gov.uk)

Address: 5th Floor, Gun Wharf, Dock Road, Chatham, Kent, ME4 4TR

### MSCP Team

- Independent Scrutineer Rory Patterson
- Independent Scrutineer for the Secure Estate John Drew
- MSCP Head of Service Rebecca Cooper
- MSCP Business Manager Simon Plummer
- MSCP Development Officer and Child Death Review Co-ordinator Kirstie King and Jennie Edwards
- MSCP Training Officer Kerry McMorris
- MSCP Project Support Officer Claire West and Rhonda Barker
- MSCP Administrator Jade Baker

### Report a death of a child

To report the death of a child who is usually resident in Medway, or who has died in Medway use the details below.

#### Child Death Overview Process

MSCP Child Death Review Coordinator 01634 336 340

### MSCP Training

To book a place on MSCP training, please phone 01634 332 256.

MSCP training email address: [mscptraining@medway.gov.uk](mailto:mscptraining@medway.gov.uk)

You can also contact the MSCP Training Officer on 01634 334 461.

### Local Authority Designated Officer (LADO)

LADO Officers provide advice and guidance to employers and voluntary organisations that have concerns about a person working or volunteering with children and young people who may have behaved inappropriately or if information has been received that may constitute an allegation.

Telephone: 01634 331 065

Email: [child.protection@medway.gov.uk](mailto:child.protection@medway.gov.uk)

Secure email: [child.protection@medway.gov.uk.cjism.net](mailto:child.protection@medway.gov.uk.cjism.net) (this email will not work if you do not have a cjism account)

More about [LADO](#) and [LADO referral forms](#)

### Concerns that a child in Medway may be suffering from harm

If you are a member of the public and have a concern about a child or young person living in Medway report using the details below.

Telephone: 01634 334 466

Email: [ss.access&info@medway.gov.uk](mailto:ss.access&info@medway.gov.uk)

Kent Safeguarding Children Multi-Agency Partnership	
Room 2.71 Sessions House County Road Maidstone ME14 1XQ Tel: 03000 42 11 26 Email: <a href="mailto:kscmp@kent.gov.uk">kscmp@kent.gov.uk</a> <a href="http://www.kscmp.org.uk">www.kscmp.org.uk</a>	
Kent Front Door	
Kroner House Eurogate Business Park Ashford TN24 8XU Tel: 03000 41 11 11 Email: <a href="mailto:frontdoor@kent.gov.uk">frontdoor@kent.gov.uk</a>	
Out of Hours	
Tel: 03000 41 91 91	
Education Safeguarding Service Contacts	
Head of Service	Tel: 03000 41 57 88
Training and Development Manager	Tel: 03000 41 87 07
Education Safeguarding Advisor - Online Protection	Tel: 03000 41 57 97

West Kent Area Area Safeguarding Adviser (Education)	Tel: 03000 41 22 84
East Kent Area Area Safeguarding Adviser (Education)	Tel: 03000 41 85 03
South Kent Area Area Safeguarding Adviser (Education)	Tel: 03000 41 56 48
North Kent Area Area Safeguarding Adviser (Education)	Tel: 03000 41 24 45
<b>Additional Contacts</b>	
NHS England: Kent and Medway Area Team	Tel: 01732 375 200
Kent and Medway Fire and Rescue Service	Tel: 01622 692 121
Kent and Medway Police	Tel: 101 and ask to speak to someone in the Child Abuse Investigation Unit
National Probation Service	Tel: 03000 47 63 25
Kent, Surrey & Sussex Community Rehabilitation Company	Tel: 03000 47 30 00
LADO	Tel: 03000 41 08 88
Designated Nurse for Safeguarding	Tel: 01634 335 043 (Safeguarding Team Secretary)
CXK	Tel: 01233 224 244

## Appendix C: School and College Safeguarding Team

Cavendish Safeguarding Director	Stephen Aiano	Cavendish Director
Designated Safeguarding Leads	Paula Brett	Safeguarding and LAC Manager, DLACT
	Jackie Woolmer	Deputy Safeguarding and LAC Manager
	Chloe Boyle	Safeguarding Coordinator
Safeguarding DSL trained staff	Joanne Baker	Interim Headteacher School and College

	Thomas Furnell	Head of College
	Georgina Moorcroft	Head of School
	Kieren Martin	Deputy Head - School
	Hayley Furnell	Deputy Head - College
	Lynne Healy	Safeguarding Administrator
	Michelle Male	Wellbeing Assistant - School
	Susan David	Assistant Deputy Head - School
	Kelly Bates	Assistant Deputy Head - College
Safeguarding Panel	Paula Brett	Safeguarding and LAC Manager, DLACT
	Joanne Baker	Interim Headteacher - School and College
	Georgina Moorcroft	Head of School

## Appendix D: Government Guidance

HM Government, What to do if you're worried a child is being abused, advice for practitioners, March 2015 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

Department for Education, Preventing and Tackling Bullying: Advice for headteachers, staff and governing bodies, July 2017 [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/623895/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf)

Department for Education, Sexual Violence and Sexual Harassment Between Children in Schools and Colleges: Advice for Governing Bodies, Proprietors, Head Teachers, Principals, Senior Leadership Teams and Designated Safeguarding Leads, May 2018 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

Department for Education, Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children, July 2018 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729914/Working\\_Together\\_to\\_Safeguard\\_Children-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf)

Department for Education, Keeping Children Safe in Education: Statutory guidance for schools and colleges, September 2020 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/892394/Keeping\\_children\\_safe\\_in\\_education\\_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892394/Keeping_children_safe_in_education_2020.pdf)

## Appendix E: Signs of Safety Mapping and Planning Form





Georgina Moorcroft, Headteacher of School

**Date: September 2021**

**Review Date: September 2022**

**Reviewed: May 2022**

