



Gateway Academy



Managing allegations of Child on Child Abuse

Approved by: Lisa Breslin and Claire Cleary

Last reviewed on: September 2025

Next review due by: September 2026

POLICY CONTEXT AND PRINCIPLES

This policy sets out Gateway Academy's approach to preventing, identifying, and responding to child-on-child abuse. The Academy recognizes that children are capable of abusing their peers and that child-on-child abuse can manifest in primary-aged children. Abuse of any nature will never be tolerated, minimized, or passed off as "banter," "just having a laugh," or a normal part of growing up.

All actions taken under this policy adhere to the core principles of the Children Act 1989 (that the child's welfare is paramount), Working Together to Safeguard Children (2023), Keeping Children Safe in Education (KCSIE 2026), and the Early Years Foundation Stage (EYFS) Statutory Framework (2024).

The Academy is committed to taking the wishes and feelings of the child into account, ensuring their voice is heard, and acting in their best interests at all times.

STATUTORY FRAMEWORK AND GUIDANCE

This policy is informed by and complies with:

- Keeping Children Safe in Education (KCSIE 2026)
- Working Together to Safeguard Children (2023)
- Children Act 1989 and 2004
- Early Years Foundation Stage (EYFS) Statutory Framework (2024)
- The Equality Act 2010
- The Counter-Terrorism and Security Act 2015 (Prevent Duty)
- UKCIS Guidance: *Sharing nudes and semi-nudes: advice for education settings working with children and young people*

DEFINITIONS AND SCOPE OF ABUSE

Child-on-child abuse occurs when a child or young person harms another physically, sexually, or emotionally. Staff must remain alert to indicators of peer abuse across all age groups, including Early Years and Key Stages 1 and 2.

Types of child-on-child abuse include, but are not limited to:

- **Physical Abuse:** Hitting, kicking, biting, pinching, shaking, hair pulling, or causing physical harm. In primary settings, staff must evaluate whether physical harm is accidental, developmental, or intentional.
- **Sexual Violence and Sexual Harassment:** Non-consensual sexual acts, unwanted conduct of a sexual nature, sexual comments, taunts, or intrusive physical behaviour. Staff must challenge all unacceptable behaviours, including grabbing, flicking clothing, or lifting skirts.
- **Bullying and Cyberbullying:** Repeated aggressive behaviour involving an imbalance of power, conducted in person or via electronic devices.
- **Discriminatory and Prejudiced Behaviour:** Targeted abuse based on race, religion, belief, disability, special educational needs, sexual orientation, gender identity, home background, **misogyny, or misandry**.
- **Youth-Produced Sexual Imagery (YPSI) / "Sexting":** The creation, sending, or sharing of explicit images or content.
- **Upskirting:** Taking photographs or videos under a person's clothing without consent.

- **Initiation or Hazing Rituals:** Violent, humiliating, or abusive rituals used to group-induct or test pupils.

PRIMARY AND EARLY YEARS CONTEXT (EYFS SAFEGUARDING)

The Academy recognizes that developmental context is critical when responding to concerns involving younger children:

- **Harmful Sexual Behaviour (HSB):** Behavior in primary or EYFS children will be assessed using the Harmful Sexual Behaviour (HSB) Support Framework (NSPCC) to distinguish between natural, inquisitive developmental exploration and problematic or harmful behavior.
- **Intimate Care and Ratios:** Where incidents occur during personal or intimate care routines, staff will maintain statutory EYFS staffing ratios and follow the Academy's Intimate Care Policy to ensure transparency and child protection.
- **Complex Needs:** Staff must recognise that children exhibiting abusive behaviours may themselves be victims of abuse, neglect, domestic violence, or trauma.

PREVENTION AND RISK MINIMISATION

The Academy proactively minimizes the risk of child-on-child abuse through:

- **Culture and Standards:** Maintaining a zero-tolerance culture toward derogatory, sexualized, misogynistic, or discriminatory language and behaviour.
- **Curriculum Delivery:** Educating pupils through an age-appropriate RSHE/PSHE curriculum covering boundaries, respectful relationships, physical privacy, personal space, and consent.
- **Filtering, Monitoring, and Online Safety:** Maintaining robust IT filtering and monitoring systems, regularly audited by the Designated Safeguarding Lead (DSL) and Governing Body to protect against harmful online content, generative AI risks, misinformation, and online bullying.
- **Children Missing Education (CME):** Monitoring attendance daily. Unexplained or repeated absences are treated as potential indicators of extra-familial harm or peer abuse and escalated in line with CME procedures.
- **Risk Assessments:** Formulating written risk assessments and supervision plans for any pupil identified as posing a risk to others.

RESPONDING TO DISCLOSURES AND REPORTS

When a child discloses child-on-child abuse, staff must:

1. **Listen and Reassure:** Listen calmly, treat the disclosure seriously, reassure the child, and never pass judgment.
2. **Avoid Promising Confidentiality:** Explain clearly that the information must be shared with the DSL to keep them safe.
3. **Record Facts:** Record what the child says using their exact words. Do not express personal opinions or ask leading questions.
4. **Report Immediately:** Pass the details directly to the DSL or Deputy DSL. Staff must not attempt to investigate the incident themselves.

ACTIONS AND ESCALATION PATHWAYS

Upon receiving a report, the DSL will assess the information, consider the wishes of the victim, and apply the appropriate pathway:

Pathway	Trigger / Circumstances	Action Required
Internal Management	Low-level, non-criminal, one-off incidents or age-inappropriate boundary crossing where no ongoing risk is present.	Managed via the Behaviour Policy, pastoral support, targeted intervention, and parent notifications.
Early Help	Emerging patterns of problematic behaviour or identified family/pastoral needs.	Initiate an Early Help assessment or refer to school-based support/CAMHS.
Children's Social Care Referral	The child has suffered harm, is at risk of harm, or is in immediate danger.	Immediate referral to Children's Social Care under Working Together 2023.
Police Referral	Allegations involving sexual assault, rape, physical violence causing severe harm, or potential criminal acts.	Immediate contact with local police (101/999) alongside a Social Care referral.

Specific Protocol: Youth-Produced Sexual Imagery (YPSI / "Sexting")

If an incident involving sexual images is reported, staff **must not** view, download, share, save, or delete the media. The DSL will handle the response using UKCIS guidance and hold an initial review to determine if police or social care thresholds are met.

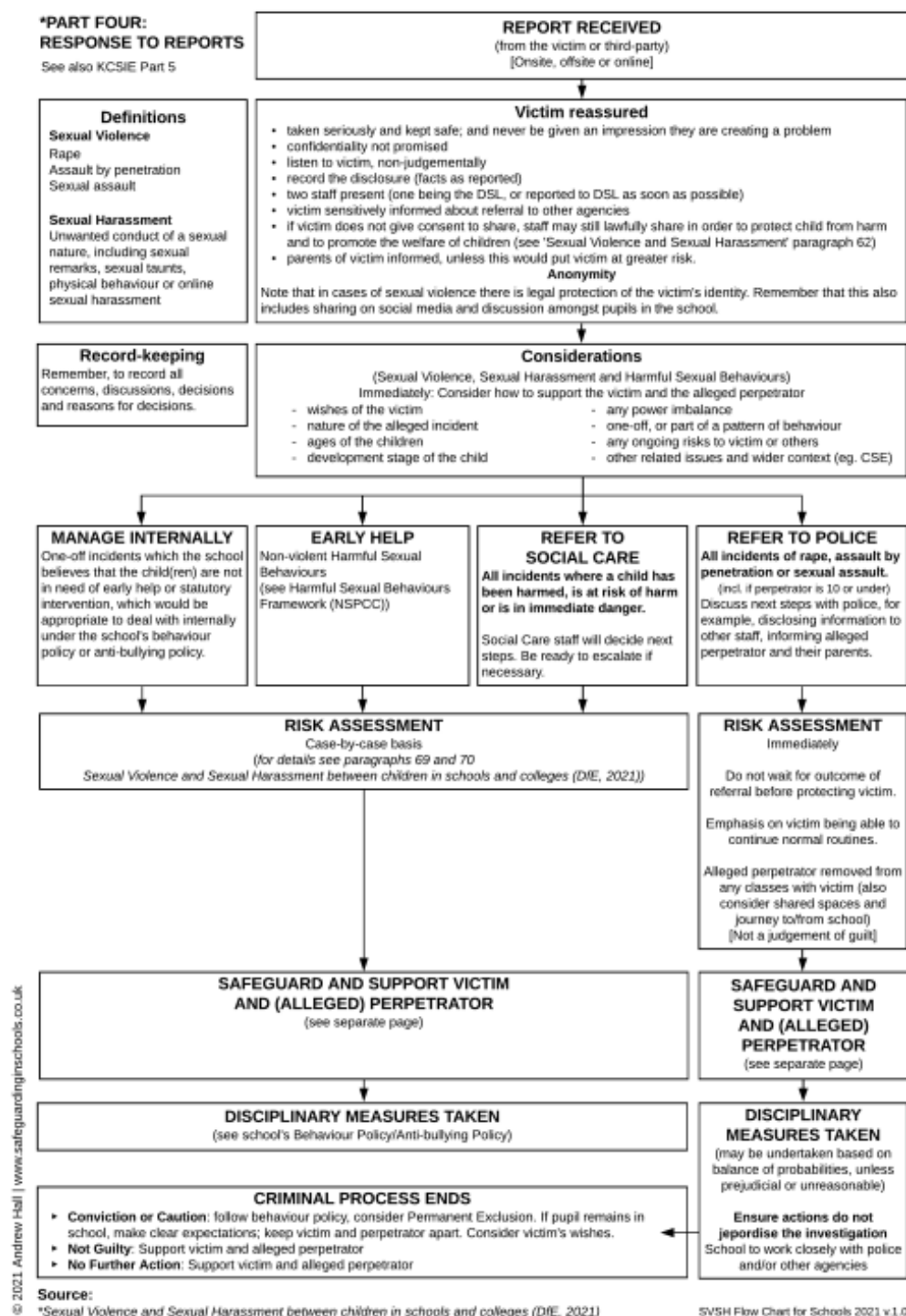
SAFEGUARDING CONTEXTS

- **Mental Health:** Allegations of child-on-child abuse can cause severe emotional distress. The DSL will evaluate mental health needs and arrange CAMHS or internal counselling referrals where appropriate.
- **Prevent Duty:** Staff remain vigilant to radicalization, extremist grooming, or peer-led ideological abuse, escalating concerns to the DSL for Prevent referrals.
- **Alternative Provision:** If a pupil involved in peer abuse is placed in alternative provision, the Academy retains safeguarding oversight and requires written confirmation of the provider's safeguarding policies.

GOVERNANCE, REVIEW, AND RECORDING

- **Record Keeping:** All allegations, decisions, risk assessments, and outcomes are documented securely on the Academy's safeguarding logging system. The DSL maintains a dedicated annual review log to analyse trends (e.g., peer harassment, online bullying).
- **Parental Engagement:** Parents of both victim and alleged perpetrator will be informed promptly, unless doing so places any child at risk of harm.
- **Publication & Review:** This policy is published on the Academy website and reviewed annually by the DSL and Governing Body, or sooner if statutory updates require.

Appendix 1 - Response to reports



Filename: Safeguarding Handbook for Schools September 2021 v.12.0.docx