GMET
Greater Manchester Education Trust

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Managing Allegations of Child-on-Child Abuse Policy

V1.2

Approval History

Approved By:	Date of Approval	Version Approved	Comments
Trust Board	20.10.22	V1.0	
Trust Board	16.10.23	V1.1	
Trust Board	14.10.25	V1.2	

Revision History

Revision Date	Previous Revision Date	Summary of Changes	Owner/Editor
14.10.2025	16.10.2023	Updated terminology, clarified information sharing and safeguarding procedures, and added new references to current government guidance and curriculum requirements.	Moressa Connolly

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1.0 PURPOSE OF THE POLICY

In our Trust we are clear that abuse is abuse and should never be tolerated or passed off as 'banter', just having a laugh' or 'part of growing up'. All child-on-child abuse is unacceptable and will be taken seriously.

In our Trust we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and from other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others, and their behaviour will be dealt with under the school's Behaviour Policy.

2.0 THE CURRICULUM

The curriculum will address issues relating to child-on-child abuse. Safeguarding, including relationships and how to take actions if you feel unsafe, will be explicitly taught and referenced at regular points throughout the year.

3.0 SAFEGUARDING ALLEGATIONS

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), including online.

Occasionally, allegations may be made against students by other students in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation.

It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found. The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

Staff members who are concerned that a child might have been / being abused by another child should follow safeguarding and child protection procedures and report to the Designated safeguarding Lead (DSL)

4.0 EXAMPLES OF CHILD-ON-CHILD SAFEGUARDING ISSUES

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence (this may include an online element)
- sexual harassment
- sharing self-generated indecent images (also known as sexting) – see Annex C of the most recent version of Keeping Children Safe in Education (KCSIE) for more details
- upskirting
- initiations / hazing type violence and rituals
- abuse in intimate personal relationships between children.

In areas where gangs are prevalent, older students may attempt to recruit younger pupils using any or all the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity.

5.0 MINIMISING THE RISK OF SAFEGUARDING CONCERNS TOWARDS STUDENTS FROM OTHER STUDENTS

On occasion, some students will present a safeguarding risk to other students. The school should be informed that the young person raises safeguarding concerns, for example, they are coming back into school following a period in custody.

These students will need an individual risk management plan to ensure that other pupils are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding.

6.0 ACTION

When an allegation is made by a pupil against another student, members of staff should report this using the school's Child Protection protocol and alert the Child Protection team.

A member of the Child Protection Team should make a factual record of the allegation, but no attempt at this stage should be made to investigate the circumstances.

A referral should be made to Children's Services. It is possible that Children's Services are already aware of safeguarding concerns around this young person.

The member of the Child Protection Team will make a record of the concern, the discussion and any outcome and keep a copy in the files of both pupils' files.

If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the student being complained about and the alleged victim).

It may be appropriate to exclude the pupil being complained about for a period of time according to the school's behaviour policy and procedures.

Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative supervision plan. Risk assessments should be generated in partnership with Children's Services and the police to manage any implications and safeguard the children. An important consideration will be to ensure that the victim can continue their normal routine, including continuing to receive a suitable education.

The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

7.0 STUDENTS ON BAIL OR RELEASED UNDER INVESTIGATION FOLLOWING ARREST

The school acknowledges that the circumstances where a student has been arrested and is released on bail will differ and therefore there follows a general set of procedures with the acknowledgement that these will need to be bespoke for each individual circumstance.

1) Academy Headteacher and Chief Executive Officer informed of student on bail by relevant agency and any relevant bail conditions pertaining to school and/or which would impact on the safeguarding of other students or staff

2) Deputy Headteacher and Designated Safeguarding Lead informed. Decision to be taken whether a further key worker to be assigned.

3) Risk Assessment generated, taking into account the safeguarding of the student concerned plus other students and staff.

4) Risk Assessment signed off by Academy Headteacher.

5) Daily welfare check undertaken with student by keyworker

6) Multi-agency meeting to be arranged where protocols regarding attendance, absence, behaviour, and liaison with parents are to be established.

7) Risk Assessment to be reviewed regularly as circumstances both internally and externally may change

8) Staff are informed only on a need-to-know basis.

From April 2017, the use of police bail has been dramatically reduced and will only be used when deemed necessary and proportionate in exceptional circumstances, thus students may also be released in the absence of bail conditions or 'released under investigation'. Consideration will be given to less invasive options to safeguard victims and witnesses and the administration of justice. Therefore, it is less likely that a child attending school will be on police bail with conditions attached if there are alternative measures to mitigate any risk.

- In the absence of bail conditions, when there is a criminal investigation, early engagement and joined up working between the school or college, children's social care and the police will be critical to support the victim, alleged perpetrator and other children involved (especially potential witnesses). Where required, advice from the police will be sought to help the school manage their safeguarding responsibilities.

- The term 'Released Under Investigation' or 'RUI' will replace those previously on bail for offences in circumstances that do not warrant the application of bail either to re-attend on a particular date or to include conditions preventing activity or in some cases ensuring compliance with an administrative process.

- There may be delays in any case that is being progressed through the criminal justice system. The school will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other children in the school. The risk assessment undertaken will help inform any decision.

- If a child is convicted or receives a caution for a sexual offence, the school will update its risk assessment, ensure relevant protections are in place for all the children at the school and, if it has not already, consider any suitable action in light of their behaviour policy. If the perpetrator remains in the same school as the victim, the school will be very clear as to their expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school thinks are reasonable and proportionate with regard to the perpetrator's timetable.

- Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other students in the and so it will be important that the school ensures both the victim and alleged perpetrator remain protected, especially from any bullying or harassment (including online).

- Where cases are classified as “no further action” (NFA’d) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The schools will discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

Through training we ensure that all staff recognise that children can abuse their peers. The senior leadership team and governing body are responsible for ensuring that procedures exist to minimise the risk of child-on-child abuse and consider how allegations of child-on-child abuse will be investigated and dealt with. There is a clear procedure on how victims of child-on-child abuse will be supported.

All staff are aware of child-on-child abuse. This is most likely to include, but not limited to, bullying (including cyber bullying), gender-based violence, sexual violence and sexual harassment, up skirting (which is now a criminal offence), physical abuse such as hitting, kicking, shaking, biting, pulling hair, sexting and initiating /instigating violence and rituals. These issues will be addressed through our school curriculum and assemblies throughout the year.

All staff are expected to refer to HM Government guidance ‘What to do if you’re worried a child is being abused – Advise for practitioners’ for further help in identifying signs and symptoms of child abuse and neglect. Staff members who are concerned that a child might have been / being abused by another child should follow safeguarding and child protection procedures and report to the DSL.

In respect of sexual violence and sexual harassment between children, the school/college takes a proactive approach to prevent such incidents from taking place. Throughout school/college, safeguarding is taught as part of our curriculum. We appreciate that whilst adults in school are working hard to keep children safe, children also play a large part in keeping themselves and their children safe from abuse and neglect. An age-appropriate curriculum is rolled out in school to build capacity amongst our students in their understanding of particular issues, and what actions they can take to be safe.

We incorporate healthy relationships, people who help us, British values and our school values, which are Excellence, Care and Respect, into our curriculum time in an age-appropriate way for the year groups in school. Also, from September 2020 we have included Relationships Education, Relationships and Sex Education (RSE) and Health Education in the school timetable, in line with DfE guidance and the national curriculum.

Students are taught to understand the issue and meaning of consent as delivered in the RSHE curriculum.

Students will be made aware of what constitutes unreasonable pressure from children to engage in risk-taking or inappropriate behaviour, and of how to report their concerns. Allegations of abuse by a child will be treated as seriously as allegations of abuse from an adult, it should never be dismissed as normal behaviour.

Robust systems have been established in school for dealing with safeguarding concerns. All allegations of abuse and neglect, whether suspected or known will be treated seriously and confidentially. Abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. We will respond and manage any reports of sexual violence and/or sexual harassment in line with guidance in KCSIE and within the MSP website.

When a disclosure is made, the information will be added to CPOMS, and the child will have the opportunity to talk to a member of staff. Staff will listen to the young person but will not ask any questions as it may become a police investigation. The information disclosed by the child should be recorded on CPOMS. The child's wishes and feelings will always be taken into account when determining the course of action.

All information is handled in accordance with the school's Information Sharing/Management Policy, which is written in line with HM Government guidance – DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers, May 2024', and the 7 principles of information sharing within that document.

When incidents of sexual violence and sexual harassment occur the school's response is ultimately decided on a case-by-case basis, with the Designated Safeguarding Lead (or a deputy) taking the lead role, using their professional judgement. Incidents of child-on-child abuse may need to be dealt with in various ways. Incidents of bullying will be dealt with via the schools' anti-bullying policy and/or behaviour policy. Incidents which take place outside of school may need to be addressed in school however the school are clear that where professional advice needs to be sought from external partners, it will be. The school's Designated Safeguarding Lead will consult children's social care on matters relating to the safety and welfare of a child and will consult the police in respect of matters relating to a possible crime. The school will put a proportionate and supportive package of care in place for those affected.

School leaders are aware that detailed advice to support schools and colleges has been published. The advice is available and includes what sexual violence and sexual harassment look like, important context to be aware of, related legal responsibilities for schools and colleges and advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment.

The school adopts the UK Council for Child Internet Safety guidance 'Sharing nudes and semi-nudes: How to respond to incidents and safeguarding young people' (March 2024) in respect of our response to sexting. This guidance clearly sets out how to handle incidents, should they occur and what preventative steps can be taken to educate young people.

8.0 RESPONDING TO REPORTS OF SEXUAL VIOLENCE/HARASSMENT

There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment.

8.1 Manage internally

- In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.
- Whatever the school's or college's response, it should be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

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Whatever the school's or college's response, it should be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.
All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

8.2. Early help

- In line with 1 above, the school or college may decide that the children involved do not require statutory interventions but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

- Full details of the early help process are in Chapter one of Working Together to Safeguard Children.

- Multi-agency early help will work best when placed alongside strong school or college policies, preventative education and engagement with parents and carers.

- Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

8.3. Referrals to children's social care

- Where a child has been harmed, is at risk of harm, or is in immediate danger, schools and colleges should make a referral to local children's social care.

- At the referral to children's social care stage, schools and colleges will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.

- If a referral is made, children's social care will then make enquiries to determine

whether any of the children involved are in need of protection or other services.

- Where statutory assessments are appropriate, the school or college (especially the designated safeguarding lead or a deputy) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

- Schools and colleges should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school or college. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school or college takes do not jeopardise a statutory investigation. The risk assessment as per paragraph 275 will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator, any other children directly involved in the safeguarding report and all children at the school or college should be immediate.

- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school or college (generally led by the designated safeguarding lead or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.

- Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

8.4. Reporting to the Police

- Any report to the police will generally be in parallel with a referral to children's social care (as above).

- It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.

- Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

- At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college is supporting the child in any decision they take. This should be with the support of

children's social care and any appropriate specialist agencies.

- Where a report has been made to the police, the school or college should consult the police and agree to what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.

- In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school or college continue to engage with specialist support for the victim as required.

- Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

After recent government action to tackle the issues raised by testimonies given on the Everyone's Invited website, NSPCC has been commissioned to run the helpline which we will publicise in school and on our website – 0800 136 663 or email help@nspcc.org.uk. This number is for children and young people who are victims of sexual abuse, adult victims, parents and carers of victims and professionals working with children and young people. It is to report or share incidents which have happened both in and outside of educational settings.

Guidance Document/Appendices for School Policies:

Child-on-Child Sexual Abuse and Harassment – Manchester Safeguarding Partnership

Keeping Children Safe in Education

Academy Trust Handbook 2025

Governance in Academy Trusts

How Schools and Colleges are Helping Build a Safer Society Based on Respecting Others and Healthy Relationships – The Education Hub

Relationships Education, Relationships and Sex Education and Health Education

Ofsted Review into Sexual Abuse in Schools: Terms of Reference

NSPCC Resources on RSE Statutory Guidance:

- https://learning.nspcc.org.uk/safeguarding-child-protection-schools/relationships-health-and-sex-education-resources
- https://assets.publishing.service.gov.uk/media/5a80597640f0b62302692fa1/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf