

Policy for Dealing with Bullying & Child-on-Child Abuse and Managing Allegations

Nisi Dominus Frustra - Without the Lord, everything is in vain

MISSION STATEMENT

- * A Rose Hill School child's learning experience is one of aspiration, adventure, and achievement in a nurturing, caring school.

AIMS

Working with **integrity** your child will:

- * Be inspired to develop **confidence** to thrive in all areas of our rich curriculum.
- * Foster the skills and talents which enable them to **organise** their learning and plan to achieve success.
- * Demonstrate **persistence** to flourish in the face of challenge.
- * Show **resilience** and learn from difficult situations.
- * **Get along** with others, work collaboratively and accept everyone.

Introduction

At Rose Hill School 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 other pupils.

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

DfE guidance *Keeping Children Safe in Education (2025)* says that "governing bodies should ensure that there are procedures in place to handle allegations against other children". The guidance also states the importance of minimising the risks of child-on-child abuse.

In most instances, the conduct of pupils towards each other will be covered by the school's Behaviour and Anti-Bullying Policies. However some allegations might be of such a serious nature that they become safeguarding concerns. These allegations are most likely to include physical abuse, emotional abuse, sexual abuse and sexual exploitation; however we are aware that the abuse may take any form.

Statement

The School always has a duty to consider the best interests of the pupil (children of all ages, from the primary through secondary stage) and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy. The School has arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers. Details of these arrangements can be found on the 'Who can Help Me?' poster displayed on Form/Class notice boards and all toilet doors. Staff should expect to support social workers and other agencies following any referral. There is a zero-tolerance approach to abuse, and it will never be passed off 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.

Bullying Definition

Bullying can be described as being a deliberate act done to cause distress solely to give a feeling of power, status or other gratification to the bully. Bullying can range from ostracising, name-calling, teasing, threats and extortion, through to physical intimidation, assault on persons and/or their property. It can be an unresolved single frightening incident that casts a shadow over a child's life, or a series of such incidents causing a child to feel unhappy,

scared or depressed for much of the time possibly leaving them psychologically damaged or even suicidal.

Child-on-child Abuse: Aims & Definition

Our Governors ensure that the child-on-child Abuse policy includes:

- procedures to minimise the risk of child-on-child abuse;
- the systems in place (which are well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously;
- how allegations of child-on-child abuse will be recorded, investigated and dealt with;
- clear processes as to how victims, perpetrators and any other children affected by child-on-child abuse will be supported;
- a recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported;
- a statement which makes clear there should be a zero-tolerance approach to abuse, and it should never be passed off 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;
- recognition that it is more likely that girls will be victims and boys’ perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously; and
- the different forms child-on-child abuse can take, such as:
 - o bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - o abuse in intimate personal relationships between peers;
 - o physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - o sexual violence and sexual harassment. The section on Sexual violence and sexual harassment between children in schools sets out how we respond to reports of sexual violence and sexual harassment;
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery): our policy includes our approach to it. We refer to the DfE’s ‘Searching Screening and Confiscation Advice’. The UKCIS Education Group has published Sharing nudes and semi-nudes: advice for education settings working with children and young people which outlines how to respond to an incident of nudes and semi-nudes being shared;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting (which is a criminal offence), which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals.

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. All staff should understand, that even if there are no reports in the school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

We recognise, acknowledge and understand the scale of harassment and abuse and/or how downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and

under pressure. Pre-planning, effective training and effective policies provide us with the foundation for a calm, considered and appropriate response to any reports. The Governing Council ensure that we contribute to multi-agency working in line with statutory guidance Working Together to Safeguard Children, 2023.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- 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 such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement. Therefore, initial responses to a report from a child is incredibly important. How we respond to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. 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 or their experience minimised.

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person’s behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.

- The definition for domestic abuse (Home Office 2013) relates to young people aged 16 and 17 who experience physical, emotional, sexual and/or financial abuse, and coercive control, in their intimate relationships
- The definition for child sexual exploitation (DCSF 2009) captures young people aged under-18 who are sexually abused in the context of exploitative relationships, contexts and situations by a person of any age – including another young person
- The definition for young people who display harmful sexual behaviour refers to any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes, but is not exclusive to abusive behaviours) (Hackett 2011, NICE 2014)
- Serious youth violence is defined with reference to offences (as opposed to relationships/contexts) and captures all those of the most serious in nature
- including murder, rape and GBH between young people under-18 (London Safeguarding Children Board 2009)

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

The safeguarding implications of sexual activity between young people

The intervention of child protection agencies in situations involving sexual activity between children can require professional judgments. Some situations are statutorily clear – for example, a child under the age of 13 cannot consent to sexual activity. But it will not necessarily be appropriate to initiate safeguarding procedures where sexual activity involving children and young people below the age of legal consent (16 years) comes to notice. In our society generally the age at which children become sexually active has steadily dropped. It is important to distinguish between consensual sexual activity between children of a similar age (where at least one is below the age of consent), and sexual activity involving a power imbalance, or some form of coercion or exploitation

Staff, parents and children at Rose Hill School will work together to create a happy, caring and safe learning environment. Bullying, whether verbal, physical or indirect, will not be tolerated. It is the responsibility of everyone to report and deal with any incidents quickly. Incidents should be reported in the first instance to the Head of Upper School (Pastoral).

The aims of the school

- to provide a safe , caring environment for the whole school community, especially the children in our care
- to instil in children the knowledge that bullying is unacceptable and that reports of bullying will be taken seriously, recorded by the Head of Pastoral Care and acted upon.
- to reassure children that they will be listened to and that they have a voice, and that it is alright to tell someone what is happening.
- to heed parents and keep them informed of actions taken in response to a complaint.
- to investigate fully and keep detailed records of any incidents, reports or complaints to evaluate the effectiveness of the approach adopted and to enable patterns to be identified and suitable action then taken to reduce the incidents of bullying.
- to take appropriate action, including possible exclusion in cases of severe or repeated bullying
- regularly remind pupils of where and how to get help and support

Prevention

At our school we will minimise the risk of allegations against other pupils by:

- Providing PSHEE as part of the curriculum as well as regular assemblies, which promote a school culture that will help pupils develop their understanding of acceptable behaviours, fosters the pupils to be 'up-standers', healthy relationships and keeping themselves safe.

- Having effective systems within our school for pupils to be able to raise concerns with staff, knowing that they have a voice and they will be listened to, supported and valued, and that the issues they raise will be looked into and addressed such as worry boxes, CEOP's recording button is on school website.
- Liaising and working with other professionals to develop robust risk assessments for pupils that are identified as posing a potential risk to other pupils
- Liaising with specialists to deliver appropriate targeted work to pupils identified as being at potential risk e.g. protective behaviours work.
- Close monitoring of all unsupervised areas.

Action following a report of sexual violence and/or sexual harassment

What to consider

Sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here. We should be aware of, and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the our duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children, or school staff; and,
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, we follow general safeguarding principles with this and our Safeguarding and Child Protection Policies. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted). The starting point regarding any report should always be that there is a 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.

Children sharing a classroom: Initial considerations when the report is made

Any report of sexual violence is likely to be traumatic for the victim. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel

ashamed for making a report. However, reports of rape and assault by penetration are likely to be especially difficult with regard to the victim, and close proximity with the alleged perpetrator(s) is likely to be especially distressing. Whilst we establish the facts of the case and start the process of liaising with children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim. We should also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on the school premises (including during any before or after school-based activities) and on transport to the school, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s). For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school premises and school transport, should be considered immediately. In all cases, the initial report should be carefully evaluated and reflected on. The wishes of the victim, the nature of the allegations and the protection of all children in the school will be especially important when considering any immediate actions.

Allegations against other pupils (safeguarding issues)

Allegations of abuse or that are a safeguarding concern may be made against other pupils within our setting. These may include allegations of physical abuse, emotional abuse, sexual abuse and sexual exploitation.

Safeguarding concerns or reports of abuse in any form may be made against pupils in our setting

It may also be considered a safeguarding issue if the allegation:

- Is being made against an older pupil and refers to their behaviour towards a younger or more vulnerable pupil
- Is of a possible criminal nature
- Puts other pupils in the school at risk, or raises the risk factor for others
- Indicates that other pupils may have been harmed or be at risk of harm
- Includes bullying (under the definition of emotional abuse) or intimidation

Specific safeguarding issues against another pupil may include:

- Physical abuse:
 - Pre-planned violence
 - Physical altercations
 - Forcing other to carry out violence
 - Forcing others to use drugs, alcohol or other substances
- Emotional abuse:
 - Bullying
 - Threats and Intimidation
 - Blackmail/extortion
- Sexual abuse:
 - Sexual assault
 - Indecent exposure
 - Indecent touching
 - Showing pornography to others
 - Forcing others to create/share/download indecent images
 - Sexting (see full guidance)
- Sexual exploitation
 - Encouraging/enticing other pupils to engage in inappropriate sexual behaviour
 - Photographing or videoing other children performing indecent acts
 - Sharing images through social media

Procedure

- When an allegation is made by a pupil against another pupil, which is of a safeguarding nature it should be reported to the Designated Safeguarding Lead (DSL) as soon as possible.
- A factual record must be kept (as normal safeguarding child protection procedures) and updated with all actions and outcomes
- The incident should not be investigated at this time
- The DSL will contact the KSCMP to discuss the case, and make a formal referral where appropriate
- If the allegation indicates that a potential crime has taken place the KSCMP will refer the case to the police
- Parents of both the alleged victim and the pupil being complained about should be informed, this should be discussed during the consultation with the KSCMP.
- A risk assessment will be considered at this time to protect all parties involved.
- It may be appropriate to exclude the alleged culprit against whom the report has been made for a fixed time in line with our schools behaviour policy and procedures.
- Police and social care will lead any investigation, however where neither police nor social care thresholds are met, our school will then undertake a thorough investigation following our schools policies and procedures.
- A risk assessment should be considered along with an appropriate supervision plan
- Support should be given to all pupil involved, and they should be involved in the relevant meetings and sign and agree to the plans that are set
- The plan should be monitored and review dates set

Options to manage the report

It is important we consider every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, we should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop us taking immediate action to safeguard their children, where required.

If allegations made directly to other agencies

In some circumstances parent or the alleged victims will report directly to other agencies. In these cases (if not police or social care) these agencies should make referrals to the KSCMP or the police.

KSCMP or police should liaise directly with the DSL for the school to inform them of the situation, or liaise with a member of the Designated Officer (LADO) and schools safeguarding team who will contact the DSL with the information. All professional involved can support with the risk assessment and management of such allegations

There are four likely scenarios for us to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

The four scenarios are:

1. Manage internally

In some cases of sexual harassment, for example, one-off incidents, we may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support. Whatever

the response, it should be underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

2. Early help

In line with 1 above, we may decide that the children involved do not require referral to statutory services 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 HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the Early Help process is and how and where to access support. Multi-agency early help will work best when placed alongside strong our policies, preventative education and engagement with parents and carers.

Early help and the option to manage a report internally do not need to be mutually exclusive:

- a school could manage internally and seek early help for both the victim and perpetrator(s).
- Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

3. Referrals to children's social care

Where a child has been harmed, is at risk of harm, or is in immediate danger, we make a referral to local children's social care. At the point of referral to children's social care, we 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, we (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(s) and any other children that require support.

We 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. 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 takes do not jeopardise a statutory investigation. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school should be immediate. In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. We (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 there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

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

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 that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The following advice may help us decide when to engage the Police and what to expect of them when they do:

When to call the police.

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

At this stage, we 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 we are supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. 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 we continue to engage with specialist support for the victim and alleged perpetrator(s) as required.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school takes does not jeopardise the police investigation.

If we have questions about the investigation, they should ask the police. The police will help and support the school as much as they can (within the constraints of any legal restrictions). Whatever the response, it should be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

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

Considering bail conditions

The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance. Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can

have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.

Whatever arrangements are in place, the school will need to consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution.

Particular regard should be given to:

- the additional stress and trauma that might be caused to a victim within the institution;
- the potential for the suspected person to intimidate the victim or a witness;
- the need to ensure that any risk management measures strike a balance between management of risk and the rights of an un-convicted person (e.g. rights to privacy, family life, etc).

Careful liaison with the police investigators should help to develop a balanced set of arrangements. Managing any delays in the criminal process.

There may be delays in any case that is being progressed through the criminal justice system. We do not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the school.

The end of the criminal process

If a child is convicted or receives a caution for a sexual offence, the school should 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 line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same school as the victim, the school should be very clear as to their expectations regarding the perpetrator(s) 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 pupils in the school. It will be important that the school ensure both the victim and perpetrator(s) 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 should continue to offer support to the victim and the alleged perpetrator(s) 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 or was withdrawn does not necessarily mean that it was unfounded. The School should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

Unsubstantiated, unfounded, false or malicious reports.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should 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, the school, will consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy. Ongoing response Safeguarding and supporting the victim

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that school is a safe space for them.

Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. We should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).

The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

Support can include:

- Early help and children's social care.
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with us to ensure the best possible outcomes for the social care agencies can signpost to ChISVA services (where available) or referrals victim.
- Police can be made directly to the ChISVA service by the young person or school. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.
- Child and adolescent mental health services (CAMHS) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority. Most CAHMS have their own website, which will have information about access, referrals and contact numbers.
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys. o NHS - Help after rape and sexual assault - NHS (www.nhs.uk) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.
- Rape and sexual assault referral centres services can be found at: Find Rape and sexual assault referral centres. Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and

support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.

- Childline provides free and confidential advice for children and young people.
- Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
- Childline / IWF: Remove a nude image shared online Report Remove is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, we will ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). We will respect and support this choice.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. We will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, we will provide a physical space for victims to withdraw.

It may be necessary us to maintain arrangements to protect and support the victim for a long time. We should be prepared for this and should work with children's social care and other agencies as required. It is therefore important that the designated safeguarding lead knows how and where to seek support.

It is important that we do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

Whilst they should be given all the necessary support to remain in school, if the trauma results in the victim being unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

Ongoing Considerations:

Victim and alleged perpetrator(s) sharing classes considered the immediate response to a report. Once the designated safeguarding lead (or a deputy) has decided what the next steps will be in terms of progressing the report, they should carefully consider again the question of the victim and alleged perpetrator(s) sharing classes and sharing space at school. This will inevitably involve complex and difficult professional decisions, including considering their duty to safeguard children and their duty to educate them. It is important each report is considered on a case-by-case basis and risk assessments are updated as appropriate. As always when concerned about the welfare of a child, the best interests of the child should come first. In all cases, we will follow general safeguarding principles as per this guidance. Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes they share with the victim. We will also consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on the school premises (including during before and after

school-based activities) and on transport to school where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s). Close liaison with the police is essential. Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action, if they have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same school would seriously harm the education or welfare of the victim (and potentially other pupils). Where a criminal investigation into sexual assault leads to a conviction or caution, we will, if we have not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.

Where the perpetrator(s) is going to remain at the school, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on the school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases. In all cases, we will record and be able to justify their decision making.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s). Appropriate support should be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis. In all cases, we will record and be able to justify their decision-making. All of the above should be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review. Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice: [Sexual violence and sexual harassment between children at schools and colleges](#). The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):

The school will have a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider pupil body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in

some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be

We will consider excluding as per our own policies. (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police.

The Lucy Faithfull Foundation has developed a [HSB](#) toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.

The NSPCC provides free and independent advice about HSB: [NSPCC Learning: Protecting children from harmful sexual behaviour](#) and [NSPCC - Harmful sexual behaviour framework](#).

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

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

It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Advice on [behaviour and discipline in schools](#) is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair.

School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. In Hackett et al 2013 study of children and young people with harmful sexual behaviour suggests that two thirds had experienced some kind of abuse or trauma. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead should take responsibility to ensure this happens as well as transferring the child protection file.

[Stop it now](#) - professionals looking for advice provides support for professionals in child sexual abuse prevention, so that they're well equipped to keep children safe.

Methods used to try to prevent bullying & child-on-child abuse

- assemblies will be used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying
- assemblies will highlight exemplary character traits and attitudes
- all subjects will incorporate the teaching of British Values
- RS and PSHE will be used to reinforce the message through stories (both fiction and non-fiction), role play, current affairs and other suitable activities.
- circle time with the younger children, especially those in the Early Years Foundation Stage gives opportunities to talk about kindness to others.
- children in the Early Years will learn to respond positively to cultural, social and physical diversity (often the causes of bullying) as part of their curriculum.

- the school council as well as the anti-bullying committee will help staff to monitor behaviour in the playground and will try to encourage and help any child who seems to be unhappy.
- Staff will endeavour at all times to create surroundings where each individual feels confident and at ease in school.
- Good character attributes will be displayed around the school and congratulatory postcards will be sent home regularly
- We will ensure that the school is well supervised, especially in areas where children might be vulnerable.
- An incident form available at playtimes to monitor any child-on-child abuse allegations

In order to try to reduce incidents of bullying and to recognise bullies, all staff watch for early signs of distress and marked changes in normal behaviour. We listen, believe and act.

All staff receive training in recognising and dealing with bullying.

Pupils with special educational needs might not be able to articulate experiences as fluently as other children. However, they are often at greater risk of being bullied, both directly and indirectly, as a result of their disability. Staff must be aware of this, and must make sure that their own behaviour does not unintentionally trigger bullying by singling out these children for special attention. They must also be careful not to make comments related to pupils' appearance or perceived character.

Teachers try to make classroom activities and lessons sensitive to the needs of all children. They teach assertiveness and other social skills and teach 'victims' to say 'No' and how to get help.

Types of Bullying that may be encountered

Racial or Cultural: Bullying based on the colour of a child's skin or hair type, or on any difference associated with culture e.g. celebration of different festivals, country of origin, different food or clothes e.g. a turban or veil.

It may take the form of verbal abuse, bringing racist literature into school, writing abusive notes or inciting others to racist behaviour or refusing to sit next to or play with children from other cultures. (see Equality Policy)

Sexual: Bullying associated with gender, homophobia, or sexual orientation. It will most likely involve name-calling or ostracising a child (or children), but may also involve inappropriate touching, or sexual notes or drawings being passed to other children. Comments may be made about appearance, attractiveness or emerging puberty, and there may be sexual innuendos or sexual harassment.

Bullying associated with disability: This will include bullying associated with obesity or its opposite, as well as that concerned with any physical or mental disability. Particularly vulnerable are children who cannot compete with others equally such as those with a learning disability, and those with Downs Syndrome or cerebral palsy, or who are confined to a wheelchair.

Also vulnerable are children with behavioural problems such as ADHD who are often targets for bullying. Taunting or ridiculing children for their disability is probably the most common form of bullying in this category.

Religious: This form of bullying is based around differences in worship, and practice e.g. non-celebration of Christmas or other festivals. Children who are withdrawn from assemblies or RE lessons may be the targets for unpleasant remarks or teasing, and also those who wear different clothes or have certain foods forbidden for religious reasons.

Cyber Bullying: This form of bullying is insidious and not easily controlled. It includes unpleasant or threatening text messages frequently sent, or repeated and abusive phone calls. Most children have computers at home and threats and bullying messages may be sent by email, sometimes with upsetting photographs. Children may become involved with a chat room or other social media websites and may become victims of cyber bullying in that way.

Use of computers/ tablets in school for all users including staff and visitors

- Only approved websites may be accessed.
- There must be online safety filters on all computers.
- All pupils must be supervised at all times if on the internet.
- No children's access to social media is permitted.

Bullying associated with high achieving: Children who achieve highly are often targets for bullying, sometimes to the extent that they become afraid to answer correctly in class for fear of being ridiculed or called names. They may have their belongings hidden or moved or may be ostracised. This form of bullying is often based on jealousy and should be taken just as seriously as other forms of bullying.

It is not always easy to spot when a child is being bullied as each child will respond to it in their own way.

Useful Guidelines

Children may:

- become upset and not want to come to school
- become introverted and isolate themselves
- appear worried or afraid
- react aggressively
- cling to adults
- develop nervous habits e.g. nail biting

Strategy for dealing with Bullying & child to child abuse

Strategies have been introduced at Rose Hill School to reduce bullying and child to child abuse. These strategies cover raising awareness of the nature of abuse, bullying and the Anti-bullying Policy, increasing understanding for victims and bullies and teaching pupils how to manage relationships in a constructive way.

In dealing with bullying, staff follow these fundamental guidelines;

- never ignore suspected bullying
- do not make premature assumptions
- listen carefully to all accounts – several pupils with the same version does not necessarily mean it is the truth
- adopt a problem-solving approach that allows pupils to move forward from self-justification
- always follow up proven cases to check that bullying has not returned
- keep detailed records of any incidents to evaluate the effectiveness of the approach adopted and to enable patterns to be identified and suitable actions then taken to reduce the incidence of bullying
- parents should be updated of repeated behaviour patterns

In response to a complaint of bullying, staff should initially follow the procedures set out in the schools 'Behaviour/ Anti-Bullying Policies' applying sanctions as necessary.

If the bullying behaviour continues, the member of staff must report it to the Head of Pastoral and if necessary, the Head, who will proceed as follows:

1. Discuss the nature of the bullying with the 'victim' at length, recording all the facts. This will require patience and understanding.
2. Identify the alleged bully/bullies and any witnesses.
3. Interview witnesses.
4. Discuss the incident(s) with the alleged bullies. Confront them with the allegations and ask them to tell the truth about the situation. Make it clear that this is only an investigation into the truth at this stage.
5. If the bully owns up, make it understood that bullying is not acceptable at Rose Hill School. Explain the effect it has on the 'victim' and also on other children in the class. Apply sanctions relevant to the type of bullying.

6. If the allegation of bullying is denied, investigate further. If there is sufficient evidence, apply relevant sanctions.
7. Hold separate discussions with the parents of both victim and bully.
8. Sanctions for the bully/ies include:
 - Withdrawal from favoured activities for a specified length of time, for example, a school visit or a match.
 - Loss of playtimes for a specified length of time.
 - Loss of a responsibility
 - Making some reparation to the victim for any damage to property that may have occurred.
 - In some cases it may be necessary to exclude the bully from school for a specified length of time after consultation (see Exclusions, Expulsion Removal and Review Policy).

A bullying incident should be treated as a child protection concern when there is "reasonable cause to suspect that a child is suffering or likely to suffer significant harm". In this situation staff will follow the guidelines of the Safeguarding Policy which brings in external agencies.

Provide a pastoral support programme for the victim, monitoring and observing at break times and lunchtimes, and through discussion to make sure there is no repetition.

Provide a pastoral support programme for the bully/ies. This will include a behaviour support and opportunities for the children to discuss relationships, feelings and the effect bullying can have on individuals. The child's class teacher will support them during this programme and will keep a daily written record of behaviour.

Parents must be kept informed at all stages of the process and must be given opportunities to discuss their child's progress and the sanctions to be employed.

Bullying off the School Premises

Rose Hill School cannot be held directly responsible for bullying that takes place off the school premises. However, if both the victim and the bully are from our school, action will be taken as if the incident had occurred on school property, and this includes informing parents.

Bullying of, or by, Adults

Although bullying in school is mostly associated with the bullying of children by other children, other instances may occur. Occasionally bullying of a child by an adult may be reported and must be investigated using the procedures outlined above. Where a member of staff is involved, the Head and Governors must be immediately informed and suitable sanctions imposed.

If a member of staff feels that they are being bullied or victimised by another member of staff or pupil, this should be immediately reported to the Head who will offer support and help to the victim. Full discussion with both parties should try to get to the bottom of the problem and the governors should be informed. Sanctions will follow if appropriate.

Police action and responsibility

Kent Police will make an assessment on a case by case basis as to the legality, proportionality and necessity to share information with partner agencies, including schools. Where a report is made concerning a school-age child, and the school / educational establishment is already involved, the police should keep the DSL for that setting updated with developments in the case and police officer / staff dealing with the matter. In Kent, schools receive domestic abuse reports where children are involved in those cases where the police identify a safeguarding need.

Where a report is made concerning a pupil and we are not already involved, the police must always give active consideration to sharing relevant information with the setting. This will ensure that the setting can take necessary measures to ensure the safety of the children

involved and others they may come into contact with. The decision on appropriate measures to take should be made by the setting with support from the police as necessary.

In the case of police or court bail conditions for safeguarding cases, the police must notify the setting of the conditions which are relevant to keep the child and others safe in the setting.

If a report indicates a safeguarding concern regarding a child or a risk they may pose to others, the presumption is the report will be shared with those who need to know to help keep children safe. A review strategy meeting may be the most appropriate way of communicating and agreeing a suitable course of action.

Legal Guidance and Responsibilities

- The Department of Education guidance, *'Preventing and Tackling Bullying, Advice for Headteachers, staff and Governing Bodies'* (October 2014) has been read and used to guide the school on the legal obligations, powers and responsibilities in terms of preventing and tackling bullying within the school.
- The non-statutory document *'Cyber Bullying: Advice for Headteachers and school Staff'*, (November 2014) has been used as a guide for tackling internet problems.
- *Keeping Children Safe in Education* (September 2025)
- *Sexual violence and sexual harassment between children in schools and colleges Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads* September 2021

External Agency Contacts

The School's local safeguarding **Kent Safeguarding Children Multi-agency Partnership**: Email: central.duty@kent.gov.uk . **KSCMP** responds to enquiries about children and young people as a result of police involvement with the child or their family and other safeguarding concerns. The website can be found [here](#). Or email: central.duty@kent.gov.uk. Further information can be found: <http://www.kelsi.org.uk/child-protection-and-safeguarding>

The **Kent Social Services**: 03000 41 11 11. Email: social.services@kent.gov.uk.

The one number above is used for all enquiries. The DSL must seek a consultation with a duty manager or social worker when not sure about making a referral. If a child's home address is outside Kent, the above number will also elicit the correct children's services contact point. Urgent child protection issue outside of working hours (5pm-8.30am) must be directed to of office hours the Central Duty Out of Hours Number: 03000 41 91 91 or, in an emergency, the Kent police should be called on 999.

The Local Authority Designated Officer (LADO): 03000 41 08 88. Email: kentchildrenslado@kent.gov.uk. The LADO manages allegations against individuals who work or volunteer with children in Kent. It bears repeating here that any individual is able to make a referral, not just a DSL or member of the MT.

Please look at Brook's recent research:

<https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool>

Dedicated NSPCC helpline 0800 136 663

The new helpline will provide both children and adults who are potential victims of sexual abuse in schools with the appropriate support and advice. This includes how to contact the police and report crimes if they wish. The helpline will also provide support to parents and professionals too.

Emma Neville, Head and DDSL
Reviewed Autumn 2025