Hampton Court House

Child on Child Abuse Policy

Last Updated: September 2026

Next Review: September 2027

Reviewed by ACB

Contents

1. Purpose and scope 3
2. Statutory framework 3
3. Principles 3
4. What is child-on-child abuse? 4
5. Sexual violence, sexual harassment and harmful sexual behaviour 4
6. Nudes and semi-nudes, including AI-generated images 4
7. Context, vulnerability and barriers to reporting 5
8. Prevention and whole-school culture 5
9. Reporting a concern 6
10. Receiving a disclosure or report 6
11. The school's immediate response 6
12. Options for managing a report 7
13. Risk and needs assessment and safety planning 7
14. Support 8
15. Parents, confidentiality and anonymity 8
16. Behaviour and disciplinary action 8
17. Unsubstantiated, unfounded, false or malicious reports 9
18. Recording, monitoring and governance 9

Appendix A: Staff response checklist 9

Appendix B: Core sources and support 9

1. Purpose and scope

Hampton Court House School and Early Years (HCH) is committed to preventing, identifying and responding appropriately to child-on-child abuse. This policy applies to all pupils from Early Years to Sixth Form, including pupils aged 18, and to concerns arising on the school site, during remote education, on transport, trips and activities, and outside school or online where they affect a child or the school community.

This policy should be read alongside the Safeguarding and Child Protection Policy, Anti-Bullying Policy, Behaviour Policy, Online Safety Policy, Acceptable Use Agreements, SEND Policy, Equality Policy, RSHE/PSHE Policy, Missing Child Policy, Exclusions Policy and Complaints Procedure.

2. Statutory framework

This policy has regard to Keeping Children Safe in Education (KCSIE) 2026, particularly Parts One, Two and Five; Working Together to Safeguard Children 2026; the Education (Independent School Standards) Regulations 2014; the Equality Act 2010; the Human Rights Act 1998; the Sexual Offences Act 2003; the Voyeurism (Offences) Act 2019; and current UKCIS advice on sharing nudes and semi-nudes.

KCSIE 2026 comes into force on 1 September 2026. HCH will also follow the current procedures and threshold guidance of the Kingston and Richmond Safeguarding Children Partnership and relevant local authorities.

3. Principles

- Child-on-child abuse is never acceptable and will not be tolerated or dismissed as banter, horseplay, part of growing up or ‘boys being boys’.
- The absence of reports does not mean that abuse is not happening. Staff will maintain an attitude of ‘it could happen here’ and act on signs, disclosures and concerns.
- All children involved will be treated as potentially vulnerable. The child who has experienced harm will be supported and protected; the child alleged to have caused harm will also receive a safeguarding response, alongside proportionate accountability.
- Children will be listened to, taken seriously and given as much control as reasonably possible over the response, balanced against the school's duty to protect them and others.
- HCH will use child-centred language. Terms such as ‘victim’ and ‘alleged perpetrator’ may be used where needed to reflect statutory guidance or agency processes, but staff will use the terminology with which each child is most comfortable.
- Responses will be age-appropriate, developmentally informed, proportionate and sensitive to SEND, communication needs, culture, sex, sexual orientation, gender identity and other vulnerabilities.

4. What is child-on-child abuse?

Child-on-child abuse is abuse of a child by another child or children. It may occur inside or outside school, online or offline, between children of any age or sex, within friendships or intimate relationships, and between individuals or groups. It may be a single serious incident or a pattern of behaviour.

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

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- abuse in intimate personal relationships between children;
- physical abuse, including hitting, kicking, shaking, biting, hair-pulling, serious assault, use or threatened use of a weapon, or an online element that facilitates or encourages physical harm;
- harmful sexual behaviour (HSB), sexual violence and sexual harassment, including sexual comments, jokes, touching, coercion, misogyny or misandry and online sexual harassment;
- causing someone to engage in sexual activity without consent;
- consensual or non-consensual making or sharing of nudes and semi-nudes, including manipulated or AI-generated images;
- upskirting and other forms of voyeurism;
- initiation or hazing-type violence, harassment or humiliation, including online elements;
- coercive control, financial abuse, exploitation, blackmail, threats, stalking or harassment; and
- abuse connected with child sexual exploitation, child criminal exploitation, gangs or serious youth violence.

5. Sexual violence, sexual harassment and harmful sexual behaviour

Sexual violence and sexual harassment exist on a continuum, may overlap and may happen online or face to face. They are never acceptable. Sexual violence includes rape, assault by penetration and sexual assault. Sexual harassment includes unwanted conduct of a sexual nature that violates a child's dignity or makes them feel intimidated, degraded or humiliated. It may be standalone or part of a wider pattern of abuse.
Children's sexual behaviour exists on a developmental continuum. Staff must not attempt to classify concerning behaviour alone: concerns must be reported to the DSL, who may use recognised frameworks and seek advice from children's social care, the police or specialist HSB services. Apparent consent must be considered in the context of age, development, coercion, fear, power imbalance and the child's freedom to choose.

6. Nudes and semi-nudes, including AI-generated images

All incidents involving the making, possession, requesting, threatening to share or sharing of nudes or semi-nudes by or of a person under 18 must be reported immediately to the DSL and managed as safeguarding concerns under current UKCIS guidance. Staff must not view, copy, print, download, forward or ask a child to share an image. If viewing is unavoidable, the

DSL will record and justify the decision. Devices may be secured in accordance with the school's searching and confiscation arrangements.

This includes photographs, videos and livestreams, as well as digitally manipulated, 'deepfake', 'deep nude' or other AI-generated sexual images. The DSL will consider coercion, consent, ages, power imbalance, distribution, commercial or exploitative elements, adult involvement and immediate risk when determining referrals and support.

7. Context, vulnerability and barriers to reporting

Any child can experience or cause harm. Abuse may be influenced by relationships, peer groups, family circumstances, neighbourhoods, transport, school spaces and online environments. Staff will consider the full context rather than viewing an incident in isolation.

Some children may face increased risk or additional barriers to recognising or reporting abuse, including:

- children with SEND, communication needs or disabilities;
- girls, who are more likely to experience sexual violence and harassment, while recognising that children of any sex can experience or cause harm;
- LGBTQ+ children, children questioning their identity, and children targeted through homophobic, biphobic or transphobic behaviour;
- children affected by racism, faith-based prejudice or other discrimination;
- children who are socially isolated, in care, previously looked after, young carers or experiencing mental ill health; and
- children affected by exploitation, domestic abuse, poverty, attendance difficulties, suspension or exclusion.

Staff must not assume that indicators such as changes in behaviour, mood, attendance, attainment or injury are explained by SEND or another known circumstance. Reasonable adjustments will be made so that children can report and participate in enquiries, including use of a trusted adult, visual or communication aids, alternative formats and additional processing time.

8. Prevention and whole-school culture

HCH takes a whole-school approach to prevention. The Governing Body/proprietor and leaders will ensure:

- clear standards of respectful behaviour and consistent challenge to sexualised, prejudicial, intimidating or abusive language and conduct;
- age-appropriate RSHE/PSHE and Early Years provision on healthy relationships, consent, boundaries, equality, online safety, reporting and bystander action;
- regular safeguarding training so staff recognise indicators, respond to disclosures and understand that apparently low-level behaviours may form part of a pattern;
- accessible reporting routes and regular reminders that children may speak to any trusted adult;
- appropriate supervision and review of higher-risk locations, times, transport, trips, changing areas and online contexts;

- pupil voice, safeguarding data and equality information are used to identify hotspots, patterns, groups at increased risk and barriers to reporting; and
- parents and carers receive information about healthy relationships, online risks and how to raise concerns.

9. Reporting a concern

All staff must report any concern, disclosure, observed behaviour or indication of child-on-child abuse to the DSL or a Deputy DSL immediately and record it on CPOMS. If the DSL is unavailable, staff must not delay necessary safeguarding action. Anyone may make a referral to children's social care; where a staff member makes a referral directly, they must inform the DSL as soon as possible.

Pupils may report to any trusted adult in person or through the school's available reporting routes. They may ask a friend to accompany them. A child will never be penalised for making a good-faith report, even if it is not substantiated. Parents and carers should contact the Form Tutor, relevant Head of School or DSL; serious or urgent safeguarding concerns should be directed to the DSL immediately.

10. Receiving a disclosure or report

The member of staff must:

- listen carefully, calmly and without judgement;
- take the child seriously, reassure them that they have done the right thing and that they are not creating a problem;
- not promise confidentiality, but explain that information will be shared only with people who need it to keep children safe;
- use open prompts only where necessary and avoid leading or repeated questions;
- not investigate, confront the child alleged to have caused harm or bring the children together;
- make an accurate written record using the child's own words, distinguishing fact from professional opinion;
- report to the DSL as soon as practically possible and immediately where risk is urgent; and
- seek emergency assistance, including calling 999, where a child is in immediate danger or requires urgent medical attention.

11. The school's immediate response

The DSL or a Deputy DSL will lead the response and will not wait for a child to make a formal disclosure where there are indicators of harm. The DSL will:

- assess immediate safety and medical needs and take protective action;
- consider the child's wishes, age, development and communication needs;
- consider the nature of the behaviour, possible offences, HSB, power imbalance, coercion, patterns and contextual risks;
- consider risks to the child who experienced harm, the child alleged to have caused harm, witnesses, siblings, other children, staff and the wider community;
- record the concern, decisions, rationale, advice received and actions on CPOMS;

- consult or refer to children's social care, the police, Family Help/Early Help or specialist services where required; and
- decide when and how parents or carers will be informed, unless doing so could place a child at additional risk or prejudice an external investigation.

The school will not delay protecting children while awaiting the start or outcome of a children's social care or police investigation. School enquiries will be coordinated with external agencies, so they do not prejudice statutory or criminal investigations.

12. Options for managing a report

Each report will be considered case by case. In line with KCSIE 2026, the response may involve one or more of the following:

- Manage internally through safeguarding, pastoral and behaviour arrangements where this is safe and proportionate.
- Universal services or community-based Early Help for emerging needs, alongside any internal response.
- Family Help, including targeted Early Help, or referral to children's social care where a child has been harmed, is at risk of harm or is in immediate danger.
- Report to the police where a crime may have been committed. Where rape, assault by penetration or sexual assault is reported, the starting point is that it will be passed to the police, including where the child alleged to have caused harm is under ten; the police will determine the appropriate welfare or criminal-justice response.

If a referral is not accepted and the DSL remains concerned, HCH will use local escalation procedures and refer again where risk remains or circumstances change.

13. Risk and needs assessment and safety planning

Following a report of sexual violence, the DSL or a Deputy DSL will complete an immediate written risk and needs assessment. Following sexual harassment or other child-on-child abuse, the need for an assessment will be decided case by case. It will be regularly reviewed and informed by professional assessments where available.

The assessment and any linked safety plan will consider:

- the safety, wishes, support and educational needs of the child who experienced harm;
- the needs, risks and support required by the child alleged to have caused harm;
- potential additional children affected or at risk, including witnesses and siblings;
- the wider school community and the location, time and context of the incident;
- classes, unstructured times, arrival and departure, transport, trips, boarding or residential arrangements where relevant, and online contact;
- reasonable separation, supervision and information-sharing measures;
- SEND, communication, health, equality and mental-health needs;
- actions, named owners, review dates and arrangements for responding to further concerns.

Following a report of rape or assault by penetration, the child alleged to have caused harm will be removed from shared classes with the child who reported the harm while facts are established and agencies are consulted. Reasonable separation elsewhere on site, during activities and on transport will also be considered. This is a neutral safeguarding measure and not a judgement of guilt. For other reports, shared classes and proximity will be considered immediately in light of risk and the child's wishes.

The child who experienced harm should not be disadvantaged or routinely moved as a consequence of another child's alleged behaviour. Any arrangements will be proportionate, non-stigmatising and kept under regular review.

14. Support

Support will be tailored and may include a trusted adult, regular check-ins, counselling, safeguarding or pastoral support, SEND adjustments, timetable or seating changes, health services, specialist sexual-violence or HSB services, Family Help or children's social care. The aim is for the child who experienced harm to continue their normal education and routine wherever possible and to experience school as a safe place.

The child alleged to have caused harm will receive an appropriate safeguarding assessment and support addressing underlying needs, attitudes and behaviour, without reducing accountability. Witnesses and other affected children will also be offered support. Support and safety measures will continue for as long as needed and will not depend on the outcome of a criminal or disciplinary process.

15. Parents, confidentiality and anonymity

Parents or carers will normally be informed promptly and involved in support and safety planning. The DSL may delay or withhold information where informing them could place a child at additional risk, conflict with the child's best interests or prejudice an external investigation; advice will be sought from children's social care or police where appropriate.

Information will be shared on a need-to-know basis. HCH cannot disclose confidential information about another child, including details of consequences or support. Staff will take reasonable steps to protect the anonymity of all children involved and will address rumours, online commentary, retaliation, intimidation or harassment.

16. Behaviour and disciplinary action

Safeguarding and disciplinary processes may run alongside each other. Consequences under the Behaviour Policy may be appropriate to protect children, uphold standards and ensure accountability. Decisions will consider the seriousness and context of the behaviour, the child's age and development, intent, impact, patterns, SEND and unmet needs, advice from agencies and the need not to prejudice an investigation.

Suspension or permanent exclusion may be considered where appropriate under the school's policies. Disciplinary action alone is not a sufficient safeguarding response: risk management, support, education and work to prevent recurrence will continue.

17. Unsubstantiated, unfounded, false or malicious reports

A report that is unsubstantiated or unfounded is not necessarily false. The DSL will consider whether the person who made the report or any other child needs support or may have experienced harm elsewhere. No disciplinary action will be taken simply because a concern is not substantiated. Where a report is proven to have been deliberately false or malicious, action may be considered under the Behaviour Policy, while still assessing safeguarding needs.

18. Recording, monitoring and governance

All concerns, discussions, decisions, advice, actions and reasons will be recorded on CPOMS in accordance with the Safeguarding and Child Protection Policy, data-protection law and the school's retention schedule. Records will include the child's voice, risk and needs assessments, referrals, parental communication, support, safety measures and review outcomes.

The DSL will analyse child-on-child abuse data for patterns, repeat concerns, protected-characteristic or discriminatory elements, online and off-site contexts, locations, times, cohorts, attendance impact and barriers to reporting. Findings will inform supervision, curriculum, training, environmental changes and policy review.

The Governing Body/proprietor will receive appropriate anonymised safeguarding information and will monitor whether this policy is understood and implemented effectively. The policy will be reviewed at least annually and sooner following significant guidance changes, a serious incident or evidence that arrangements require improvement.

Appendix A: Staff response checklist

- Listen, reassure and take the child seriously.
- Do not promise confidentiality or investigate.
- Record the child's words accurately.
- Report immediately to the DSL or a Deputy DSL and record on CPOMS.
- Call 999 or seek urgent medical help if there is immediate danger.
- Do not view, copy or forward nudes or semi-nudes.
- The DSL assesses risk, protects children, considers referrals and records rationale.
- Support, safety planning and review continue regardless of external outcomes.

Appendix B: Core sources and support

- Department for Education: Keeping Children Safe in Education 2026.
- Department for Education: Working Together to Safeguard Children 2026.
- UK Council for Internet Safety: Sharing nudes and semi-nudes—advice for education settings working with children and young people.
- Kingston and Richmond Safeguarding Children Partnership procedures and threshold guidance.

- NSPCC Learning: harmful sexual behaviour resources and framework.
- Brook: Sexual Behaviours Traffic Light Tool (used only by appropriately trained practitioners and subject to licensing/current guidance).
- CEOP Safety Centre and Report Remove, delivered by Childline and the Internet Watch Foundation.
- NHS Sexual Assault Referral Centres (SARCs) and local specialist support services.