

MANAGING CHILD-ON-CHILD ABUSE, HARMFUL SEXUAL BEHAVIOUR, SEXUAL HARASSMENT AND SEXUAL VIOLENCE POLICY



LIGHTHOUSE
MULTI ACADEMY TRUST

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1.0	September 2025	
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Introduction

Lighthouse Multi Academy Trust is committed to providing a safe, respectful and inclusive environment in which every child can learn, develop and thrive. We recognise that safeguarding is everyone's responsibility and that all children have the right to feel safe both within and beyond the school environment.

The Trust recognises that children can abuse other children and that child-on-child abuse is a safeguarding issue which must never be tolerated or dismissed. Child-on-child abuse can take many forms, including but not limited to:

- harmful sexual behaviour (HSB)
- sexual harassment
- sexual violence
- physical abuse
- emotional abuse
- bullying, including prejudice-based and discriminatory bullying
- abuse within intimate personal relationships
- online abuse
- coercive and controlling behaviour
- initiation or hazing-type violence and rituals.

We recognise that abuse may occur:

- within school;
- outside school;
- online;
- offline; or
- through a combination of online and offline behaviours.

The Trust recognises that advances in technology have created new safeguarding risks. Child-on-child abuse may involve the creation, possession or sharing of nude or semi-nude images, including digitally manipulated or AI-generated images ("deepfakes"), as well as other forms of technology-facilitated abuse.

We are committed to creating a culture in which children feel safe to report concerns, confident that they will be listened to, believed and supported. Reports of child-on-child abuse will never be dismissed as:

- "banter";
- "part of growing up";
- "having a laugh";
- "boys being boys"; or
- any other explanation that seeks to minimise harmful behaviour.

Every report will be taken seriously, recorded appropriately, risk assessed and managed on an individual basis in accordance with safeguarding procedures.

This policy should be read alongside the academy Child Protection and Safeguarding Policy, Behaviour Policy, Relationships, Sex and Health Education (RSHE) Policy, Online Safety Policy, Staff Code of Conduct and any local safeguarding procedures.

This policy reflects the statutory guidance contained within **Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026**, and other relevant safeguarding legislation and guidance. It supports the academy whole-school approach to safeguarding, recognising that safeguarding and promoting the welfare of children is everyone's responsibility

Legal Framework

This policy has been developed in accordance with the statutory guidance **Keeping Children Safe in Education 2026** and should be read alongside academy Child Protection and Safeguarding Policy and other relevant safeguarding procedures.

The Trust has due regard to all relevant legislation and statutory guidance relating to safeguarding and child protection, including, but not limited to:

Primary legislation

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Human Rights Act 1998
- Equality Act 2010
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Data (Use and Access) Act 2025

Statutory guidance

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children (2023)
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers
- What to do if You're Worried a Child is Being Abused: Advice for Practitioners
- Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance

The Trust will also have due regard to:

- local safeguarding partnership procedures;
- local authority safeguarding arrangements;
- guidance issued by the Department for Education;
- guidance published by the Child Safeguarding Practice Review Panel;
- guidance from the NSPCC, Lucy Faithfull Foundation and other recognised safeguarding organisations where this supports best practice.

All safeguarding practice under this policy will be underpinned by the principles of early identification, effective information sharing, multi-agency working and a child-centred approach, ensuring that the welfare of the child remains paramount at all times.

Context

Victims and children who have allegedly displayed harmful behaviour

Lighthouse Multi Academy Trust recognises that child-on-child abuse can have a significant and lasting impact on all children involved. Every incident must therefore be considered individually, proportionately and through a child-centred safeguarding approach.

For the purposes of this policy, the terms **"victim"** and **"alleged perpetrator"** are used because they are widely recognised within statutory safeguarding guidance. However, we acknowledge that not all children who have experienced abuse will identify themselves as victims or wish to be described in this way.

Staff will therefore carefully consider the language they use when speaking with children and families, adopting terminology that is appropriate to the individual child and their wishes wherever possible.

Similarly, whilst this policy refers to an **"alleged perpetrator"** or **"child who has displayed harmful behaviour"**, we recognise that children who harm other children frequently have unmet safeguarding needs of their own and may themselves have experienced abuse, trauma, neglect or exploitation.

Our response will therefore always seek to:

- safeguard and support the child who has experienced harm;
- ensure the safety of all children within the school community;
- understand and address the needs and risks presented by the child displaying the behaviour;
- work collaboratively with parents, carers and partner agencies;
- provide appropriate intervention and education to reduce future risk.

The Trust will avoid language or actions that unnecessarily criminalise or stigmatise children. Decisions will always be informed by professional curiosity, evidence, risk assessment and the individual circumstances of each case.

All safeguarding decisions will remain focused upon the welfare and best interests of every child involved.

What is Child-on child abuse?

Child-on-child sexual abuse encompasses a range of harmful behaviours that occur between children and young people. These behaviours exist on a continuum, ranging from inappropriate or problematic behaviours through to harmful sexual behaviour, sexual harassment and serious sexual violence.

Sexual abuse between children should never be considered an inevitable part of growing up, harmless experimentation or dismissed as banter. All concerns must be taken seriously and responded to promptly, proportionately and in accordance with safeguarding procedures.

Children displaying harmful sexual behaviour require safeguarding, assessment and, where appropriate, intervention to address the causes of their behaviour, whilst ensuring the safety and wellbeing of those who have experienced harm.

Harmful Sexual Behaviour (HSB)

Harmful sexual behaviour is developmentally inappropriate sexual behaviour displayed by children or young people which may:

- cause harm to another child;
- be abusive towards another child;
- involve coercion, intimidation, manipulation or exploitation;
- occur online or offline; or
- indicate wider safeguarding concerns.

Harmful sexual behaviour can range from inappropriate sexual language through to serious sexual assault.

Schools should always consider:

- the age and developmental stage of those involved;
- whether there is a power imbalance;
- whether consent could genuinely be given;
- whether coercion, pressure or intimidation was present;
- previous incidents or patterns of behaviour.

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature that may occur:

- face-to-face;
- online;
- through digital communication;
- through images or videos;
- through AI-generated or digitally manipulated content.

Sexual harassment may include, but is not limited to:

- sexual comments;
- sexual jokes;
- sexualised name-calling;
- unwanted sexual attention;
- sexual taunting;
- deliberately brushing against another person;
- displaying or sharing sexual images without consent;
- making sexual remarks about appearance or body parts;
- sexual rumours;
- requests for sexual images;
- non-consensual sharing of sexual content;
- upskirting;
- creating or sharing AI-generated sexual images ("deepfakes");
- online sexual harassment through social media, gaming platforms or messaging services.

Sexual harassment can create an intimidating, hostile, degrading or humiliating environment and should never be considered acceptable behaviour.

Sexual Violence

Sexual violence refers to sexual offences committed by one child against another.

Examples include:

- rape;
- assault by penetration;
- sexual assault;
- causing someone to engage in sexual activity without consent.

The Trust recognises that consent cannot be assumed because children know one another or are in a relationship.

Children under the age of 13 cannot legally consent to any sexual activity.

Any allegation of sexual violence will be managed as a safeguarding concern and may also constitute a criminal offence.

Online and Technology-Facilitated Abuse

The Trust recognises that technology is increasingly used to facilitate child-on-child abuse.

This may include:

- sharing nude or semi-nude images without consent;
- coercing another child into creating sexual images;
- threatening to share intimate images;
- image-based abuse;
- AI-generated or digitally manipulated sexual images;
- recording assaults;
- sharing abusive material through social media or messaging platforms;
- cyberflashing;
- sexually abusive behaviour during online gaming.

Incidents involving technology will be managed using this policy alongside the Trust Online Safety Policy and current national guidance relating to nude and semi-nude image sharing.

Recognising Patterns

Staff should be alert to repeated low-level incidents which, when viewed together, may indicate escalating harmful behaviour.

Individual incidents should therefore never be viewed in isolation. Staff should consider:

- frequency;
- context;
- motivation;
- power imbalance;
- vulnerability;
- previous safeguarding concerns;
- wider patterns of behaviour.

Professional curiosity should always be exercised when considering whether behaviour indicates wider safeguarding concerns.

Definitions

For the purposes of this policy, the following definitions apply.

Child-on-child abuse

Child-on-child abuse is any form of abuse where a child or young person is harmed by another child or young person. It can occur between children of any age and gender, both inside and outside of school, and may take place face-to-face, online or through a combination of both.

Child-on-child abuse is a safeguarding issue and should never be dismissed as banter, part of growing up, harmless fun or normal behaviour.

Harmful Sexual Behaviour (HSB)

Harmful sexual behaviour refers to sexual behaviours displayed by children or young people that are developmentally inappropriate, may be harmful to themselves or others, or are abusive towards another child.

Harmful sexual behaviour exists on a continuum, ranging from inappropriate sexual language or behaviour through to serious sexual assault. Each incident must be considered individually, taking account of the child's age, developmental stage, understanding, the nature of the behaviour and any power imbalance.

Sexual Harassment

Sexual harassment means unwanted conduct of a sexual nature that violates a child's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment may include, but is not limited to:

- sexual comments or jokes;
- sexualised name-calling;
- unwanted sexual attention;
- sexual rumours;
- deliberately touching another person without consent;
- displaying or sharing sexual images;
- making sexual comments about appearance or body parts;
- online sexual harassment;
- requests for sexual images;
- image-based abuse;
- cyberflashing;
- creating or sharing AI-generated or digitally manipulated sexual images.

Sexual harassment can occur as a one-off incident or as part of a pattern of behaviour.

Sexual Violence

Sexual violence refers to sexual offences committed by one child against another child.

These include offences under the Sexual Offences Act 2003, including:

- rape;
- assault by penetration;
- sexual assault; and
- causing a person to engage in sexual activity without consent.

Any report of sexual violence must be treated as a safeguarding concern and may also constitute a criminal offence.

Consent

Consent is the free and informed agreement to participate in a specific activity.

Consent cannot be assumed because:

- children know each other;
- they are friends;
- they are in a relationship; or
- consent has been given previously.

Consent cannot be freely given where there is coercion, manipulation, intimidation, fear, exploitation or a significant imbalance of power.

Children under the age of 13 cannot legally consent to any form of sexual activity.

Online Child-on-child Abuse

Online child-on-child abuse is abuse that takes place through digital technology, including social media, messaging services, gaming platforms, livestreaming services and other online environments.

Examples include:

- online sexual harassment;
- sharing nude or semi-nude images without consent;
- threatening to share intimate images;
- coercing another child to create sexual images;
- recording or sharing assaults;
- image-based abuse;
- AI-generated or digitally manipulated sexual images;
- abusive group chats;
- sexually abusive behaviour within online gaming.

The Trust recognises that online abuse can have the same serious impact as abuse occurring in person.

Child Who Has Experienced Harm

For the purposes of this policy, the term **child who has experienced harm** refers to a child who has been subjected to child-on-child abuse.

The Trust recognises that not every child will identify themselves as a victim. Staff will therefore use language that is appropriate to the individual child while ensuring safeguarding responsibilities are met.

Child Alleged to Have Displayed Harmful Behaviour

This policy uses the term **child alleged to have displayed harmful behaviour** to describe a child whose behaviour has caused concern.

The Trust recognises that children displaying harmful behaviour may themselves have experienced abuse, neglect, trauma or exploitation. They will therefore receive appropriate safeguarding support alongside any necessary investigation or intervention.

How we seek to minimise the risk of sexual harassment and violence

Lighthouse Multi Academy Trust is committed to creating and maintaining a culture in which all children feel safe, valued, respected and able to learn free from abuse, harassment, discrimination and violence.

Preventing child-on-child abuse is a whole-school responsibility and forms part of the Trust's wider safeguarding culture. All staff are expected to model respectful behaviour, challenge inappropriate conduct and promote positive relationships at every opportunity.

The Trust recognises that prevention is most effective when safeguarding is embedded throughout the curriculum, school culture, leadership and daily practice.

To minimise the risk of child-on-child abuse, the Trust will:

Promote a Positive Safeguarding Culture

We will:

- foster an inclusive, respectful and welcoming school environment;
- promote equality, diversity and inclusion;
- maintain high expectations of behaviour for all members of the school community;
- encourage kindness, empathy and mutual respect;
- ensure children understand that abusive, discriminatory or harmful behaviour is never acceptable;
- challenge language or behaviours that normalise abuse, including sexist, misogynistic, misandrist, homophobic, biphobic, transphobic, racist or discriminatory language.

Deliver a Preventative Curriculum

Through Relationships, Sex and Health Education (RSHE), Computing, Personal Development and the wider curriculum, pupils will be taught:

- healthy and respectful relationships;
- consent and personal boundaries;
- recognising abusive behaviour;
- online safety and digital resilience;
- the safe use of technology and social media;
- the risks associated with sharing nude or semi-nude images;
- the risks associated with AI-generated and digitally manipulated images;
- recognising coercion, exploitation and controlling behaviour;
- how and where to seek help.

Learning will be age-appropriate, inclusive and responsive to emerging safeguarding risks.

Encourage Children to Report Concerns

Children will be encouraged to:

- report concerns about themselves or others;
- recognise trusted adults within school;
- understand that all concerns will be taken seriously;
- support one another in seeking help where appropriate.

The Trust will maintain a range of accessible reporting routes so that children feel confident in raising concerns.

Maintain a Vigilant Workforce

The Trust will ensure that:

- all staff receive safeguarding training appropriate to their role;
- staff understand the indicators of child-on-child abuse;
- staff understand harmful sexual behaviour and technology-facilitated abuse;
- safeguarding updates are provided regularly;
- staff understand their responsibilities for early identification, recording and reporting concerns;
- safeguarding practice is regularly reviewed through supervision, monitoring and quality assurance.

Work in Partnership with Parents and Carers

The Trust recognises that parents and carers play a vital role in safeguarding children.

Where appropriate, we will:

- provide information about online safety;
- promote healthy relationships education;
- communicate safeguarding expectations;
- work collaboratively with families to support children.

Use Contextual Safeguarding Approaches

The Trust recognises that abuse may occur beyond the school gates and may be influenced by peer groups, neighbourhoods, social media or other community settings.

Where concerns arise, staff will consider the wider environmental factors that may place children at risk and will work with partner agencies where appropriate to reduce harm.

Monitor and Review Practice

Senior leaders and safeguarding staff will regularly review:

- behaviour trends;
- safeguarding data;
- bullying incidents;
- sexual harassment reports;
- online safety concerns;
- attendance patterns;
- pupil voice;
- emerging safeguarding risks.

This information will be used to strengthen safeguarding practice and inform future preventative work.

Responding to an incident or allegation

The Trust recognises that all reports of child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence must be treated as safeguarding concerns. Every report will be taken seriously, managed sensitively and responded to promptly, with the welfare of the child remaining paramount throughout.

No report will be dismissed as banter, part of growing up, teasing or harmless behaviour. Children should never be made to feel ashamed, blamed or responsible for the abuse they have experienced.

The Trust will adopt a child-centred approach at every stage, ensuring that the wishes, feelings and lived experiences of the child are considered alongside the need to safeguard all children involved.

Immediate Action by Staff

Any member of staff who receives a report, witnesses an incident or has concerns about possible child-on-child abuse must:

- remain calm and listen carefully;
- reassure the child that they have done the right thing by speaking to an adult;
- explain that the concern cannot be kept confidential because the school has a duty to keep children safe;
- avoid asking leading, probing or investigative questions;
- only ask open questions where clarification is necessary;
- make a clear, factual record of the concern using the child's own words wherever possible;
- report the concern immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL.

Staff must never investigate allegations themselves or attempt to mediate between children involved in an allegation of abuse.

The Role of the Designated Safeguarding Lead

The DSL (or Deputy DSL) will consider each report individually and will:

- speak with the child, where appropriate, in a safe and supportive environment;
- consider the wishes and feelings of the child;
- undertake an immediate safeguarding and risk assessment;

- determine whether there is an immediate risk of harm;
- consider the needs of all children involved;
- decide whether Children's Social Care and/or the Police should be informed;
- consider whether Family Help or other early intervention services are appropriate;
- determine appropriate safeguarding measures;
- ensure all actions and decisions are accurately recorded, including the rationale for those decisions.

The DSL may seek advice from Children's Social Care, the Police or other safeguarding partners before informing parents or carers where this is necessary to protect a child or preserve a criminal investigation.

Risk Assessment

Following any report of child-on-child abuse, the DSL will complete an individual risk assessment.

The assessment will consider:

- the safety and wellbeing of the child who has experienced harm;
- the safety and wellbeing of the child alleged to have displayed harmful behaviour;
- the safety of other pupils and staff;
- any continuing contact between the children involved;
- educational arrangements;
- transport arrangements;
- social times, including break and lunchtime;
- online contact and social media;
- previous safeguarding concerns;
- known vulnerabilities;
- any additional protective measures required.

Risk assessments are dynamic documents and will be reviewed regularly to reflect changing circumstances.

Recording the Concern

All concerns must be recorded promptly on the academy CPOMS system.

Records should:

- be factual, accurate and contemporaneous;
- clearly distinguish fact from professional opinion;
- include the child's own words wherever possible;
- record actions taken and decisions made;
- record the reasons for decisions;
- identify any referrals made to external agencies;
- be stored securely in accordance with the Trust's safeguarding procedures and applicable data protection legislation.

Referrals

The DSL will determine whether the matter should be referred to:

- Children's Social Care;
- the Police;
- Family Help services;
- health professionals;
- specialist support services;

- other safeguarding partners.

Where appropriate, referrals will be made without delay.

Where a child already has an allocated social worker, they will be informed promptly of the concern.

Online and Technology-Facilitated Abuse

Where concerns relate to online abuse or the creation, possession or sharing of nude or semi-nude images, including AI-generated or digitally manipulated images, staff will follow current national guidance and the Trust's Online Safety Policy.

Staff must not:

- view or forward indecent images unless absolutely necessary to safeguard a child;
- copy, print, download or distribute images;
- conduct their own investigation of electronic devices.

Advice will be sought from the DSL, Children's Social Care and the Police where appropriate.

Supporting the Children Involved

The Trust recognises that both the child who has experienced harm and the child alleged to have displayed harmful behaviour may require ongoing safeguarding support.

Support will be tailored to individual needs and may include:

- regular pastoral support;
- safeguarding check-ins;
- counselling or mental health support;
- adjustments to timetables or supervision arrangements;
- support from external agencies;
- safety planning;
- regular review meetings with parents or carers where appropriate.

Support will continue for as long as necessary and will be reviewed regularly.

Confidentiality and Information Sharing

Information will only be shared with those who need to know in order to safeguard children or fulfil their professional responsibilities.

The Trust will share information lawfully, proportionately and in accordance with statutory safeguarding guidance, recognising that effective information sharing is essential to protecting children.

The Lighthouse Multi Academy Trust, Child -on- Child, Sexual Harassment and Violence Protocol

At the Lighthouse Multi Academy Trust, we recognise that a child or young person is likely to disclose to someone they trust: this could be anyone on the academy staff. Therefore, all staff must be aware of the response protocol.

- Do not promise confidentiality
- Inform the victim of the next steps
- Be supportive and respectful
- Be non-judgemental and listen to what the child or young person is saying
- to you (TED questions; Tell me, Explain, Describe...)
- No leading questions, use open questions
- Record the disclosure via CPOMS (devote time to listening to what the child is saying, write notes if it is appropriate and then transfer or scan/upload
- Only record the facts as the child or young person presents them
- No personal opinions should be recorded
- Inform the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead immediately.

Where the report includes an online element, it is important for all Lighthouse Multi Academy Trust academies to be aware of searching, screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child. The hyperlinked advice provides more details on what to do when viewing an image is unavoidable.

When to inform the alleged perpetrator will be a decision that should be carefully considered. Where a report is going to be made to children's social care (via Walsall Multi Agency Safeguarding hub – MASH) and/or the police, then, as a general rule, the academy should speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations.

The Designated Safeguarding Lead should consider the following:-

- Parents or carers should normally be informed (unless this would put the victim at greater risk);
- The basic safeguarding principle is that: if a child is at risk of harm, is in immediate danger or has been harmed a referral should be made to children's social care; and
- Rape, assault by penetration and sexual assaults are crimes. The starting point is that reports should be passed to the police.
- The Designated Safeguarding Lead will make a decision whether to contact Children's Social Care and the police. If the Designated Safeguarding Lead is not available, it's the responsibility of the individual member of staff to contact Children's Social Care and/or the police.
- Where there has been a report of sexual violence, the Designated Safeguarding Lead should make an immediate risk assessment factoring in:-
 - The victim, especially their protection and support
 - The alleged perpetrator
 - Other children or young people (and sometimes staff)
 - Lessons/classes where the victim and alleged perpetrator are together
 - Transport
 - Consideration of any ongoing risks to the victim, other children and young people, and staff
 - Consideration of any other related issues and wider context

The safety of our pupils is paramount. We will use a proportionate approach, basing our actions on the principle that sexual harassment and violence is not acceptable and will not be tolerated.

All concerns will be considered carefully and on a case by case basis, underpinned by robust risk assessments. Our actions will not be judgemental about the guilt of the alleged perpetrator and will always be taken in the interests of all children and young people involved.

Risk assessments should be recorded (written or electronic) and should be kept under regular review.

At all times, we will actively consider the risks posed to all their children and young people and put adequate measures in place to protect them and keep them safe.

The logging of incidents via CPOMs will enable DSLs and senior leaders to maintain an overview of issues being reported. Academies should follow the reporting tool set out on each CPOMS platform. Academies will inform the Director of Safeguarding and Attendance at the Lighthouse Multi Academy Trust of Child-on-Child, Sexual Violence or Sexual Harassment incidents, including risk assessments undertaken.

Supporting Children and Young People who has allegedly experienced sexual harassment and sexual violence

The Trust recognises that children who have experienced sexual harassment, sexual violence or other forms of child-on-child abuse may be affected in different ways and that the impact may not be immediately apparent.

Every child will be listened to, treated with dignity and respect, and supported in a way that recognises their individual needs, wishes and circumstances.

The Trust will adopt a trauma-informed, child-centred approach, recognising that recovery is not always linear and that support may be required over an extended period.

Immediate Support

Following a report, the Designated Safeguarding Lead (DSL) will ensure that the child is safe and that appropriate immediate support is in place.

This may include:

- providing a trusted adult within school;
- ensuring the child has access to a safe space if required;
- agreeing immediate safety arrangements;
- considering whether adjustments to the timetable or school day are necessary;
- ensuring that the child knows how to seek further support.

The Trust will take all reasonable steps to reduce the likelihood of further distress or contact with the child alleged to have displayed harmful behaviour where appropriate.

Ongoing Support

Support will be tailored to the individual child and regularly reviewed.

Depending on need, this may include:

- regular meetings with the DSL or another trusted member of staff;
- pastoral support;
- counselling or therapeutic intervention;
- mental health support;
- educational support to minimise disruption to learning;
- adjustments to timetables or seating plans;
- support with attendance and reintegration where appropriate;
- referrals to specialist external agencies.

The level of support will be determined through ongoing assessment and discussion with the child and, where appropriate, their parents or carers.

Listening to the Child

The Trust is committed to ensuring that the child's voice remains central to all safeguarding decisions.

Where appropriate, the child will be supported to:

- express their wishes and feelings;
- contribute to decisions affecting them;
- understand the support available;
- identify a trusted adult within school.

Whilst every effort will be made to take account of the child's wishes, the Trust's overriding responsibility is to safeguard all children.

Working with Parents and Carers

Where appropriate, parents or carers will be involved in planning and reviewing support arrangements.

The Trust recognises, however, that there may be circumstances where informing parents immediately could place a child at increased risk or compromise a police or Children's Social Care investigation. In such cases, advice will be sought from the relevant safeguarding agencies before information is shared.

Multi-Agency Working

Where appropriate, the Trust will work collaboratively with:

- Children's Social Care;
- the Police;
- Family Help services;
- health professionals;
- Child and Adolescent Mental Health Services (CAMHS) or other mental health providers;
- sexual violence support services;
- other safeguarding partners.

Effective information sharing and coordinated planning are essential to ensuring children receive the right support at the right time.

Educational Provision

The Trust will make every reasonable effort to ensure that the child can continue to access education safely.

Where necessary, consideration will be given to:

- adjustments to teaching arrangements;
- supervised movement around the school site;
- alternative learning arrangements where appropriate;
- reasonable adjustments for pupils with additional needs;
- maintaining participation in school life wherever possible.

The Trust will seek to minimise disruption to the child's education while ensuring that safeguarding remains paramount.

Reviewing Support

Support arrangements will be reviewed regularly by the DSL.

Reviews will consider:

- whether safeguarding measures remain effective;
- the child's wellbeing and progress;
- any new safeguarding information;
- the effectiveness of interventions;
- whether additional support is required.

Support will continue for as long as it is needed, regardless of whether criminal proceedings are pursued or concluded.

Supporting the child or young person who has allegedly displayed sexual harassment and sexual violence

The Trust recognises that a child who has allegedly displayed sexual harassment, sexual violence or other harmful sexual behaviour may have unmet safeguarding needs of their own. Such behaviour may be an indicator of abuse, neglect, trauma, adverse childhood experiences, exploitation or other vulnerabilities.

Whilst it is essential that appropriate action is taken to safeguard the child who has experienced harm, the Trust also has a responsibility to assess and respond to the safeguarding and welfare needs of the child alleged to have displayed the behaviour.

Support will be provided in a way that promotes accountability, encourages positive behavioural change and seeks to reduce the risk of future harm.

Assessment of Need

The Designated Safeguarding Lead (DSL) will consider whether the behaviour indicates that the child may require additional safeguarding support.

This will include consideration of:

- any previous safeguarding concerns;
- experiences of abuse, neglect or trauma;

- child criminal or child sexual exploitation;
- exposure to domestic abuse;
- harmful online influences;
- mental health or emotional wellbeing needs;
- speech, language, communication or learning needs;
- any special educational needs or disabilities (SEND);
- family circumstances;
- wider contextual safeguarding concerns.

Where appropriate, advice will be sought from Children's Social Care, Family Help services or other relevant professionals.

Support and Intervention

Support will be proportionate to the child's identified needs and level of risk.

This may include:

- regular meetings with the DSL or pastoral staff;
- restorative work where appropriate and safe to do so;
- behaviour support;
- counselling or therapeutic intervention;
- mental health support;
- educational support;
- targeted work on healthy relationships, consent and respectful behaviour;
- online safety education;
- referrals to external agencies or specialist services.

Support will be planned carefully to ensure it does not compromise the safety or wellbeing of the child who has experienced harm.

Accountability and Behaviour

The Trust expects all children to take responsibility for their behaviour.

Where allegations are substantiated, appropriate action will be taken in accordance with the Behaviour Policy, Child Protection and Safeguarding Policy and any advice received from Children's Social Care or the Police.

Any disciplinary action will take account of:

- the child's age and developmental stage;
- the nature and seriousness of the behaviour;
- safeguarding needs;
- any identified vulnerabilities;
- statutory guidance;
- the need to protect other children.

Safeguarding considerations will always remain central to decision-making.

Multi-Agency Working

Where appropriate, the Trust will work in partnership with:

- Children's Social Care;
- the Police;
- Family Help services;
- health professionals;
- Child and Adolescent Mental Health Services (CAMHS) or other mental health providers;
- youth offending or youth justice services, where applicable;
- other safeguarding partners.

The purpose of multi-agency working is to reduce risk, address underlying needs and support positive outcomes for the child.

Ongoing Review

The DSL will regularly review:

- the effectiveness of support provided;
- the child's engagement with interventions;
- any emerging safeguarding concerns;
- the effectiveness of risk management arrangements;
- whether additional referrals or interventions are required.

Support will continue for as long as it is required and will be adapted in response to changing circumstances.

Thresholds and Investigation Outcomes

Every report of child-on-child abuse, harmful sexual behaviour, sexual harassment or sexual violence will be assessed individually by the Designated Safeguarding Lead (DSL).

The Trust recognises that no two incidents are the same and that decisions must be based on the individual circumstances, level of risk and the needs of all children involved.

The welfare of the child who has experienced harm will remain the Trust's paramount consideration throughout any decision-making process.

Determining the Appropriate Threshold

Following the initial assessment, the DSL will consider the most appropriate course of action.

This may include:

- managing the incident internally through the school's safeguarding and behaviour procedures;
- implementing safeguarding measures and ongoing monitoring;
- making a referral to Family Help services;
- making a referral to Children's Social Care;
- reporting the matter to the Police;
- undertaking a combination of the above.

The decision will take account of:

- the nature and seriousness of the behaviour;
- the age and developmental stage of the children involved;
- any actual or potential harm caused;
- any imbalance of power;

- previous incidents or patterns of behaviour;
- the wishes and feelings of the child who has experienced harm;
- the views of partner agencies where appropriate;
- the level of ongoing risk to any child.

Where there is uncertainty regarding the appropriate threshold, the DSL will seek advice from Children's Social Care or other safeguarding partners.

Investigations

The Trust will work cooperatively with Children's Social Care, the Police and other agencies where they are involved.

School investigations will not interfere with or prejudice any statutory safeguarding enquiry or criminal investigation.

Where external agencies are leading enquiries, the Trust will follow their advice regarding:

- interviewing children;
- sharing information;
- disciplinary action;
- communication with parents or carers;
- management of evidence.

The Trust will continue to implement safeguarding measures throughout any investigation.

Internal School Outcomes

Where appropriate, and following consideration of all available information, the Trust may determine that the matter should be managed internally.

Possible outcomes include:

- no further action where concerns are unsubstantiated and no safeguarding risk remains;
- additional pastoral support;
- educational interventions;
- restorative approaches, where appropriate, safe and agreed by all parties;
- behaviour support;
- sanctions in accordance with the Behaviour Policy;
- ongoing safeguarding monitoring;
- review of existing risk assessments.

The Trust recognises that an internal outcome does not prevent further action should new information become available.

Referrals to External Agencies

A referral will be made to Children's Social Care where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

The Police will be informed where a criminal offence may have been committed or where this is otherwise required to safeguard children.

The Trust will cooperate fully with all statutory safeguarding partners throughout any investigation.

Outcomes Following External Investigation

Following the conclusion of any external investigation, the Trust will work with partner agencies to determine the most appropriate next steps.

This may include:

- implementing or reviewing safeguarding plans;
- reviewing risk assessments;
- reintegration planning;
- ongoing pastoral support;
- behaviour management strategies;
- additional referrals to specialist services.

The outcome of a police investigation or criminal proceedings will not automatically determine the safeguarding response. The Trust will continue to assess and manage risk based upon the needs of the children involved.

Recording Decisions

The DSL will ensure that:

- all decisions are recorded clearly;
- the rationale for decisions is documented;
- advice received from external agencies is recorded;
- actions taken are reviewed regularly;
- safeguarding records are maintained securely in accordance with the Trust's record-keeping procedures.

Review

This policy will be reviewed annually, or sooner where required, to ensure it remains compliant with current legislation, statutory guidance and safeguarding best practice.

The policy will also be reviewed where there are:

- changes to statutory safeguarding guidance, including *Keeping Children Safe in Education*;
- changes to relevant legislation;
- updates to local safeguarding partnership arrangements;
- findings from safeguarding audits or external reviews;
- recommendations arising from serious incidents, safeguarding practice reviews or complaints;
- significant changes to the Trust's safeguarding procedures.

Responsibility for reviewing this policy rests with the Trust Safeguarding Lead, in consultation with the Designated Safeguarding Leads, Headteachers and other relevant stakeholders.

The Trust Board (or delegated committee) will approve the policy following each review and will receive assurance that appropriate safeguarding arrangements are in place across the Trust.

In addition to the formal review cycle, the implementation and effectiveness of this policy will be monitored through:

- safeguarding audits and quality assurance activities;
- monitoring of safeguarding records and trends;
- feedback from pupils, staff and parents where appropriate;
- Designated Safeguarding Lead monitoring;
- governor and trustee safeguarding oversight;
- outcomes of inspections and external safeguarding reviews.

Any amendments made outside of the annual review cycle will be communicated promptly to all relevant staff and incorporated into the next published version of the policy.



The Lighthouse Multi Academy Trust Risk Assessment for Child-on-Child Sexual Abuse/ Harmful Sexual Behaviour

Guidance

This risk assessment must be completed by the Designated Safeguarding Lead (DSL) or Deputy DSL following all reports of:

- Child-on-child sexual violence
- Harmful sexual behaviour
- Sexual harassment where there is an identified safeguarding concern
- Any incident where ongoing safeguarding measures are required

The purpose of this assessment is to identify and manage risk, safeguard all children involved and determine any immediate or ongoing protective measures.

This assessment should be completed alongside:

- Keeping Children Safe in Education 2026
- Academy Child Protection and Safeguarding Policy
- Child-on-Child Abuse Policy
- Behaviour Policy
- Online Safety Policy

The assessment should be treated as a **dynamic document** and reviewed whenever circumstances change.

All completed assessments must:

- be uploaded to CPOMS;
- be reviewed regularly;
- record all decisions and rationale;
- be shared with relevant staff on a need-to-know basis.

Risk Assessment Details

Academy:	
DSL completing assessment:	
Date:	
Date of incident:	

Date risk assessment completed:	
CPOMS reference:	
Police Incident Number (if applicable)	
Children's Social Care Reference (if applicable):	
Review date:	

Child Involved:

Child who experienced harm:	
Year Group:	
SEND:	
Additional vulnerabilities:	

Child alleged to have displayed harmful behaviour:

Child alleged to have displayed harmful behaviour:	
Year Group:	
SEND:	
Additional vulnerabilities:	

Initial Assessment			
Consideration	Risk level High Medium Low	Actions Required	Review
Nature of incident			
Was a criminal offence alleged?			
Seriousness of incident			
Immediate safeguarding concerns			
Child's wishes and feelings			
Ongoing fear or distress			
Power imbalance			
Previous safeguarding history			
Pattern of behaviour			
Online elements involved			
AI generated or manipulated images			
Risk of further contact			
Location and timing			

Educational Arrangements			
Consideration	Risk level High Medium Low	Actions Required	Review
Shared classes			
Breaktimes			
Lunchtimes			
Transport			

Clubs			
Arrival/departure			
Movement around the academy			
Toilets			

Online Safety			
Consideration	Risk level High Medium Low	Actions Required	Review
Social media contact			
Messaging apps			
Gaming platforms			
Sharing of images			
Group chats			
Cyberbullying			
Image-based-abuse			

Wider Safeguarding Considerations	
Consideration	Review
Contextual safeguarding	
Family circumstances	
Domestic abuse	
Child exploitation	
Mental health	
Substance misuse	
Attendance concerns	
Previous behaviour incidents	
Peer group influence	

Other safeguarding concerns	
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Protective Measures (tick those implemented)	
Protective Measure	
Increased supervision	
Timetable changes	
Seating plan changes	
Separate break and lunch	
Supervised movement	
Online safety measures	
Staff briefing	
Safe space identified	
Trusted adult allocated	
Pastoral support	
Mental health support	
Counselling	
Other	

Multi Agency Actions			
Action	Yes	Date	Outcome
Parents informed			
Police			
Children's Social Care			
Family Help			
CAMHS			
Health			
Early Help Support			

Other Agency			
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Overall Risk		
High	Medium	Low
Reason for judgement:		

Signature	
Headteacher: Date:	
DSL: Date:	
Trust Representative: Date:	