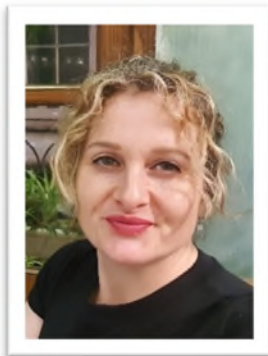


Lufton College

Safeguarding Policy -

(3) Child on Child Abuse

Student on Student Abuse



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Introduction

This policy is written in line with Keeping Children Safe in Education (KCSiE) 2025 and Working Together to Safeguard Children 2023. Its aim is to give school / college staff a better understanding of Child on Child Abuse, signs to identify harm and how to respond.

We also incorporate the statutory Working Together to Improve School Attendance guidance, recognising unexplained or persistent absence as a potential safeguarding indicator. Please refer to links below for guidance.

[Working together to safeguard children 2023: statutory guidance](#)

[Working together to improve school attendance \(applies from 19 August 2024\) Keeping children safe in education 2025](#)

We also provide education to individuals over the age of 18 years. With that in mind, this policy has also been written in line with the Care Act 2014, Education Act 2002 and the Mental Capacity Act 2005. Abuse that takes place between over 18s is referred to as Student on Student Abuse. Those over the age of 18 are referred to as Students.

Our Schools / colleges have a **zero-tolerance to abuse** it is not 'banter' 'having a laugh' 'part of growing up' or 'boys will be boys'.

Even if no cases are reported, such abuse may be taking place and is not being reported. Staff remain vigilant and maintain an attitude of 'it could happen here'.

All our schools/colleges work with multi-agency partners—including Virtual School Heads for children in care and kinship care—to ensure students/children receive the right intervention at the right time.

We embed the latest DfE guidance on generative artificial intelligence (AI), spot harmful outputs and train staff on safe AI use.

We commission and quality-assure Alternative Provision to safeguard children/students placed off-site.

We reflect the National Audit Office insights on group-based child sexual exploitation (CSE) and exploitative peer networks.

We prepare for forthcoming duties under the Children's Wellbeing & Schools Bill on mentalhealth education and trauma-informed practice.to ensure that students/children have the right intervention at the right time.

Wider Policies support this Policy and are outlined below.

1. The Role of the DSL Policy
2. Child Protection Policy
3. Filtering and Monitoring Policy

4. Missing From Education
5. Absent from Education Policy
6. Schools Safer Recruitment Policy
7. Managing Contextual Risks to Children
8. Safeguarding Over 18s Policy
9. Remote Learning Policy
10. Online Safety Policy
11. Whistleblowing Policy
12. Behaviour Policy
13. PREVENT Policy
14. Physical Intervention Policy
15. SEND Policy
16. Staff Behaviour Policy/Code of Conduct
17. Absent from Education Policy

Aims of this policy

The aims of this policy ensures staff understand:

- What Child on Child / Student on Student Abuse is
- The signs of a child/student who may be suffering
- Different categories of bullying including disinformation-driven harassment
- Abuse in intimate personal relationships between children/students
- Physical abuse
- Harmful Sexual Behaviour (HSB)
- Initiation/hazing type violence and rituals
- How to respond to child on child / student on student abuse
- How allegations of child on child /student on student abuse will be recorded, investigated and dealt with
- Process on supporting victims, perpetrators and any other individuals affected
- Responsibilities when children/students are placed in alternative provision, including commissioning and quality-assuring placements
- The role of Virtual School Heads in overseeing children in kinship care
- Forthcoming duties under the Children's Wellbeing & Schools Bill on mental-health education and trauma-informed practice

What is Child on Child /Student on Student Abuse?

Formally known as Peer-on-Peer Abuse, the Department of Education renamed this abuse to recognise lack of power balance in the wording. The word 'peer' means equal to. This led people to believe that this abuse existed between 2 people and did not consider the power imbalance between the perpetrator and victim. Factors such as ages, vulnerabilities, learning needs, family background are now considered. This means that within child on child

/student on student abuse, both the victim and perpetrator's vulnerabilities should be considered.

The Department of Education (DfE) state:

"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 or college and online."

Child-on-child abuse applies to abuse by one child of another—regardless of developmental stage, age differential or setting. Group-based child exploitation and gang-related grooming must be recognised as a specific risk.

For those over 18 years, child on child abuse is referred to as student on student abuse.

Signs that a child / student may be suffering

Common signs of abuse maintain the core list of indicators of child on child abuse. Below is a list, which is not comprehensive but are common signs that a child / student may be a victim of abuse.

- absence from school or disengagement from school activities including persistent unauthorised absence
- physical injuries
- mental or emotional health issues
- becoming withdrawn – lack of self esteem
- lack of sleep
- alcohol, substance or self-harm concerns
- changes in behaviour
- inappropriate behaviour for age
- harmful towards others
- hyperfocused with disinformation or extremist content online

Staff understand all abuse is unacceptable, is taken seriously, and that girls are statistically more likely to be victims of sexual harassment and boys more likely to display harmful sexual behaviour.

Bullying

There are many different ways a child/student can be harmed by another child/student. Staff are vigilant around areas such as cyberbullying, prejudice-based and discriminatory bullying.

Cyberbullying is bullying with the use of digital technologies. It can take place on social media, messaging platforms, gaming platforms and mobile phones. It is repeated behaviour, aimed at scaring, angering or shaming those who are targeted. Staff are also alert to AI-generated abusive imagery and following the Online Safety Policy.

Prejudice-based bullying is when bullying behaviour is motivated by prejudice based on an individual's actual or perceived identity; it can be based on characteristics unique to a child or student's identity or circumstance.'

Discriminatory bullying is making or showing an unjust or prejudicial distinction between different categories of people such as:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Marriage and civil partnership
- Race
- Sex/ Sexual orientation
- Religion or belief

Disinformation-fuelled harassment campaigns which are designed to shame or isolate.

Staff follow the Child Protection / Adult Safeguarding policy when they suspect a child/student is being bullied. Staff may have concerns about bodily marks, bruising, what an individual may disclose abuse or evidence of online bullying/grooming. In each instance the process for managing concerns is clear in the policies.

Abuse in intimate personal relationships between children

Children and students, particularly in their teens will be exploring relationships and experience sexual feelings they may not understand. Relationships may be between 2 individuals who are different genders, the same gender, different ages or different schools.

The victim may struggle to come forward as they may not be aware that what happened to them was wrong. The victim may also not be able to communicate the trauma they have faced or their vulnerabilities may impact their understanding of what has happened.

Likewise, the perpetrator may not understand their actions have caused harm. The perpetrator may also not fully understand their feelings or how to manage these. The perpetrator may themselves have vulnerabilities or a family history of domestic abuse and not understand the trauma they have caused.

Staff understand or seek to understand the underlying factors beneath an individual's disclosure of abuse and know how to respond.

Staff follow the Child Protection/Adult Safeguarding policy when an individual makes a disclosure and always reports the matter to the DSL without delay.

Physical abuse

Children and students can also physically abuse one another. Training and resources predominately tend to encourage staff to think of this in a domestic environment but staff also consider things such as hitting, kicking, shaking, biting, hair pulling, punching or causing physical harm in a school environment.

All individuals irrespective of age or gender can be a victim or perpetrator of this. Staff are vigilant to such incidents and follow the School/College Behaviour Management Policy. They also refer to the statutory Working Together to Improve School Attendance guidance to identify unexplained or persistent absences that may mask physical abuse.

Incidents are reported to the DSL without delay. The DSL then considers any apparent patterns of incidents and whether a number of low-level incidents show a pattern where a child may be vulnerable to bullying or abuse. The DSL also reviews patterns of group-based exploitation and whether any incidents overlap with contexts such as gang-related activity or organised peer abuse.

Harmful Sexual Behaviour (HSB)

Harmful sexual behaviour includes a variety of sexual behaviours, which can range from the inappropriate use of sexual language to public masturbation, to the grooming and sexual exploitation of children and other vulnerable individuals.

These behaviours can include:

- Sexual violence and harassment
- Youth produced sexual imagery (Consensual and non-consensual sharing of nude and semi-nude images and/or videos), including AI-generated or AI-manipulated imagery and deepfakes
- Upskirting (taking a picture under a person's clothing without their permission)
- Touching sexual body parts in public
- Removing clothing and public exposure
- Masturbating in public
- Touching sexual body parts of others (children and/or adults)
- Simulation of sexual activity during play
- Forcing other children to engage in sexual play
- Secretly arranging to meet online acquaintances, including through generative AI chatbots or disinformation-driven grooming narratives .
- Sexually explicit talk with younger children
- Forcing other children (including those more vulnerable or younger) to engage in sexual activity
- Non-consensual sexual activity (such as forcing someone to strip, touch themselves or engage with someone in a 3rd party)
- Sexual activity with someone in authority and in a position of trust

- Sexual activity with family members
- Involvement in sexual exploitation and/or trafficking
- Sexual contact with animals
- Receipt of gifts or money in exchange for sex

Staff consider the needs of individuals who access our schools. Staff consider how our children develop physically and sexually in line with societal norms but also consider the difference in their social and emotional understanding. For example, research suggests that children with autism undergo normal physical development at puberty but the emotional changes and increasing sexual urges which accompany adolescence may be delayed or prolonged.

Staff recognise that individuals accessing our schools are most likely undergoing the same psychological sexual maturation as their peers, however, their emotional and social understanding may impact their behaviour.

All staff receive regular training on spotting AI-driven grooming, disinformation tactics, and the escalation of harmful sexual content online.

If a child/student discloses or staff suspect an individual is displaying harmful sexual behaviour, staff notify the DSL immediately.

The DSL considers:

- Has a crime been committed? Is police intervention required?
- Whether this is a safeguarding concern, does this need to be escalated to their local social services dept?
- Have parents/carers been informed where appropriate?
- Has there been a pattern of this behaviour previously (either at school/college, home or in the community)
- Is there any known concerns linked to the family home that the DSL is aware of?
- Is anyone (including the individual) at risk of immediate harm and require an immediate intervention?
- Have known risks been assessed and is a recurrence likely?
- What measures can be put in place to reduce the risk in future, including commissioning and quality-assuring support through alternative provision where appropriate?

Our DSLs apply a contextual safeguarding approach when assessing child-on-child abuse, recognising that incidents may occur in the school, in the community, or online. Risk assessments consider patterns, peer groups, and community contexts, not just individual behaviours.

Initiation/hazing type violence and rituals

Hazing or initiation ceremonies refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person

into a group. Hazing is seen in many different types of social groups, including gangs, sports teams and school groups.

The initiation rites can range from relatively benign pranks, to protracted patterns of behaviour that rise to the level of abuse or criminal misconduct. Hazing may include physical or psychological abuse. It may also include nudity or sexual assault. Staff are alert to such behaviour and act in line with the Child Protection/Adult Safeguarding and Behaviour Management policies. They also follow the Online Safety and Filtering & Monitoring Policy to monitor digital channels—including encrypted apps, AI-generated group chats or disinformation-fuelled rituals—that may facilitate or normalise initiation practices.

National Data & Prevalence Rates

- 1 in 5 pupils aged 11–16 report experiencing sexual harassment by peers in the past year (DfE SFR June 2025)
- 60% of recorded peer-on-peer abuse incidents involve multiple perpetrators (NAO “Groupbased CSE” Feb 2025)
- Reports of AI-manipulated sexual content among students have risen by 35% since July 2024 (Internet Watch Foundation Apr 2025)
- Girls aged 13–15 are twice as likely as boys to be victims of peer sexual harassment; boys are 1.8 × more likely to display harmful sexual behaviours (DfE SFR June 2025)

School Culture

Our school/college has a zero-tolerance whole-school approach i.e. harmful behaviours will not be passed off as ‘banter’, ‘just growing up’, etc. Issues that might later provoke conflict are addressed early. Reporting systems are well promoted, easily understood and easily accessible and have the confidence of children and students. Staff also recognise that even if there are no reported cases of child on child abuse/student on students abuse, such abuse may still be taking place and is simply not being reported.

Staff and students treat each other with respect and understand how their actions affect others. Staff and students feel able to openly discuss issues that could motivate child on child abuse. We understand our local community and the context in which children and students are growing up in.

We ensure children/students know the risks – we talk about child on child/student on student abuse in an age-appropriate way. Our school creates opportunities for children/students to weigh up risks and recognises that sometimes this means they will take risks we as adults and professionals disagree with. Our role influences children/students to make healthy long-term choices and keeps them safe from harm in the short-term.

Staff understand the impact of child on child/student on student abuse on mental health as well as the additional needs/vulnerabilities of individuals with special educational needs or disabilities; those who identify as lesbian, gay, bisexual and/or transgender; and/or those who have other perceived differences and recognise this may impact their capacity to be open about any abuse they are suffering.

Staff check children/young people have safe relationships – in their family, with their peers and with your staff. We have created an environment where it is OK to talk, even about the most difficult things.

We spot the signs and know what to do – we use the checklists above along with our safeguarding procedures and are confident to raise child on child/student on student abuse as a possibility.

Reporting and Managing concerns re child on child/student on student abuse

When a concern or disclosure arises, staff must:

- **Immediate safety** – Secure the child(ren)'s immediate physical/emotional safety (separate if needed).
- **Non-judgmental listening** – Do not investigate; listen calmly, avoid shock/disbelief, and don't ask leading questions (TED: Tell, Explain, Describe).
- **Report same day** – Inform the DSL (or deputy) without delay. Record in the child's own words.
- **Threshold check** – DSL considers if the concern meets social care or police thresholds and if so refers to the Child Protection/Over 18s Safeguarding Policy process (using local safeguarding partnership guidance and NPCC When to Call the Police).
- **Risk assessment** – DSL completes a written risk assessment covering victim, alleged perpetrator, and wider pupils.
- **Safeguarding measures** – DSL/SLT decide and document protective measures, which may include:
 - o timetable or class changes
 - o spatial separation (e.g., seating plans, different break/lunch areas)
 - o adjusted supervision
 - o online restrictions
- **Support plans** – DSL ensures both victim and alleged perpetrator have support plans. This may include pastoral/mental health input, SEND adjustments, or external referrals.
- **Parent/carers communication** – Inform parents/carers of children involved, unless doing so places the child at additional risk.
- **Review** – Set clear review dates for risk assessment and support plans; DSL monitors and updates regularly.
- **Record-keeping** – All actions, rationales, and updates are logged on the safeguarding system.

Abuse that involves or is believed to involve sexual assault and violence always results in a multi-agency response, including police, social services, health and digital-safety specialists. We are aware of local police and social services arrangements regarding allegations and our

commissioning and quality-assurance duties for any children/students placed in Alternative Provision.

Process on supporting victims, perpetrators and any other individuals affected

As well as supporting and protecting the victim, school staff and external professionals we apply a trauma-informed approach to recognise trauma responses and to deliver interventions that prioritise emotional safety and empowerment. In doing so we consider whether the perpetrator is a victim of abuse and whether they may also be in danger of being subjected to abuse post allegation.

We involve Virtual School Heads where either party is in care or kinship care, ensuring their non-statutory oversight shapes support plans.

Peer pressure can be huge for children/students and there will be times when the abuse, in whatever form it takes, looks consensual. We include specialist input on generative AI risks and disinformation-driven grooming in multi-agency discussions, involving social care, police and digital-safety experts to ensure investigations are robust.

In situations where the individuals are in the same class or even school/college, we conduct joint risk assessments to safeguard both parties, specify safe travel arrangements and, if needed, commission and quality-assure alternative provision placements to keep them apart.

If the allegation involves rape and/ or assault by penetration, the perpetrator is removed from any shared classes. In line with guidance, any separation arrangements continue for as long as is necessary to make sure children are safe.

We review the site and digital environments where the alleged abuse occurred—both on and off-site—to identify and mitigate risks, including misuse of AI apps or encrypted platforms, using the Online Safety and Filtering & Monitoring Policies to do so.

Insert Link for Online Safety and Filtering & Monitoring Policies

Ongoing mental-health monitoring is provided for all parties, with referrals to school-based counsellors or external mental-health services in line with forthcoming Children's Wellbeing & Schools Bill duties on trauma-informed practice and enhanced mental-health education.

Ongoing Education and Awareness

Our school/college is committed to on-going education and awareness surrounding child on child/student on student abuse. This is evidenced by:

- Annual safeguarding training which includes generative AI safety, spotting disinformation and conspiracy-theory grooming, group-based exploitation trends (per National Audit Office findings), and trauma-informed practice.

- PSHE / RSE curriculum updates ensure age-appropriate coverage of consent, healthy relationships, digital resilience, online disinformation risks and the impact of AI-generated content.
- We participate in events such as Anti-Bullying Week, Online Safety Day and bespoke workshops on digital wellbeing, delivered by accredited providers.
- Staff receive mental health first-aid training aligned with the Children's Wellbeing & Schools Bill to recognise early warning signs and make timely referrals.
- We partner with local multi-agency forums—social care, police, health, VSHs and digitalsafety specialists—to review trends, share learning and ensure our prevention strategies evolve with emerging risks.
- Students have regular assemblies and workshops on topics such as bystander intervention, recognising grooming tactics, setting digital boundaries and reporting AI-facilitated harms.
- We maintain up-to-date filtering and monitoring systems that now flag disinformation, extremist content and AI-generated deepfakes, integrating alerts into our safeguarding reporting channels.

Review History

A review will be undertaken annually as a minimum. However, subject to a significant safeguarding concern this policy and all other attached policies will be reviewed and monitored as part of a lessons learned review.

This policy was reviewed in August 2025 by Laura Dickie (Head of Policy), Jo Dunn (Director of Compliance, Quality and Regulation - Children), Lindsey Appleby-Flynn (Head of Learning and Development), Kate Brogan (Head of IT), the DSL of the School and agreed by the Head of the Governance Board.

Next Review – September 2026