



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

Last Reviewed	June 2026
Reviewed By (Name)	Governors July 2026
Policy Leads	Hannah McKie. Hollie-Mae Jones, Alex Sutcliffe
Next Review Date	June 2027

Lead DSL	Hannah McKie
Deputy DSLs	Hollie-Mae Jones, Nadeem Shah, Alex Sutcliffe, Gavin Powers, Karen Marriott, Leah Slack, Dave Price, Lydia Allen
Related Policies	Safeguarding & Child Protection, Behaviour, Online Safety, RSHE, Anti-Bullying, Staff Code of Conduct

1. Policy Statement

At Park Schools Federation, we are committed to providing a safe, inclusive and nurturing environment where every child feels valued, respected and protected. We recognise that safeguarding is everyone's responsibility and that all children have the right to learn in an environment free from abuse, harassment, discrimination and harm.

We are committed to preventing, identifying and responding effectively to incidents of child-on-child sexual violence, sexual harassment and harmful sexual behaviour (HSB). We recognise that these behaviours can occur both in person and online and will never dismiss them as "banter", "part of growing up" or harmless behaviour.

All concerns will be taken seriously and managed in accordance with Keeping Children Safe in Education (KCSIE 2025), Working Together to Safeguard Children, Derby and Derbyshire Safeguarding Children Partnership (DDSCP) procedures and the Federation's safeguarding arrangements.

2. Aims

The aims of this policy are to:

- Protect all pupils from sexual violence, sexual harassment and harmful sexual behaviour.
- Create a culture where pupils feel safe and confident to report concerns.
- Ensure all staff understand their safeguarding responsibilities.
- Promote healthy relationships and respectful behaviour.
- Provide clear procedures for recording, reporting and responding to concerns.
- Work effectively with parents, carers and external agencies.
- Support both victims and children displaying harmful sexual behaviour.

3. Legislative Framework

This policy should be read alongside:

- Keeping Children Safe in Education (KCSIE 2025)
- Working Together to Safeguard Children
- The Children Act 1989 and 2004
- The Equality Act 2010
- Relationships Education, Relationships and Sex Education (RSE) and Health Education Guidance
- Derby and Derbyshire Safeguarding Children Partnership Procedures
- Park Schools Federation Safeguarding and Child Protection Policy
- Behaviour Policy
- Online Safety Policy
- Anti-Bullying Policy
- RSHE Policy

4. Roles and Responsibilities

The Governing Body is responsible for ensuring effective safeguarding arrangements are in place and that this policy is reviewed annually.

The Designated Safeguarding Lead (DSL) is responsible for leading safeguarding practice relating to harmful sexual behaviour, ensuring concerns are managed appropriately, liaising with external agencies, overseeing risk assessments and maintaining accurate records.

The Federation's safeguarding team consists of:

Lead DSL

- Nadeem Shan

Deputy DSLs

- Hollie-Mae Jones
- Hannah McKie
- Alex Sutcliffe
- Gavin Powers
- Leah Slack

- Dave Price

All staff have a responsibility to remain vigilant, report concerns immediately and follow safeguarding procedures.

5. Definitions

Child-on-child abuse occurs when a child is exploited, harmed or abused by another child. This may include bullying, emotional abuse, physical abuse, sexual violence, sexual harassment, harmful sexual behaviour, online abuse and the sharing of nude or semi-nude images.

Sexual harassment includes unwanted conduct of a sexual nature such as sexual comments, jokes, gestures, online harassment, sexualised language or unwanted physical contact.

Sexual violence includes sexual offences as defined by law including rape, assault by penetration and sexual assault.

Harmful sexual behaviour refers to sexual behaviour displayed by children that is developmentally inappropriate, harmful to themselves or others, abusive or exploitative.

6. Understanding Sexual Behaviour

The Federation recognises that some sexual behaviours may form part of normal childhood development. However, some behaviours may indicate safeguarding concerns.

Healthy sexual behaviours are generally age-appropriate, mutual, exploratory and free from coercion, secrecy or power imbalance.

Problematic sexual behaviours may indicate a need for further assessment and support. These behaviours require professional curiosity and consideration of the wider context.

Harmful sexual behaviours are developmentally inappropriate and may involve force, coercion, intimidation, exploitation, fear, secrecy or significant power imbalance. Such behaviours require immediate safeguarding action.

7. Prevention Through Education

Prevention is central to the Federation's safeguarding approach.

Through PSHE, RSHE, Computing, Religious Education and the wider curriculum, pupils learn about:

- Healthy relationships
- Consent and personal boundaries
- Respect and kindness
- Online safety
- Equality and diversity
- British Values
- Protected Characteristics
- Personal safety
- Appropriate and inappropriate behaviour

Weekly safeguarding, British Values and personal development assemblies reinforce these themes and provide opportunities for discussion, reflection and pupil voice.

8. Parents and Carers

The Federation works in partnership with parents and carers to promote safeguarding and positive relationships.

Parents and carers are supported to understand:

- The nature of harmful sexual behaviour.
- Signs and indicators of concern.
- Online risks and digital safety.
- How concerns are managed by the school.
- Sources of support available for children and families.

9. Staff Training and Professional Development

All staff receive annual safeguarding training that includes child-on-child abuse, sexual harassment, sexual violence and harmful sexual behaviour.

Safeguarding updates are provided regularly throughout the year to ensure staff remain informed about current guidance, emerging risks and local safeguarding priorities.

Designated Safeguarding Leads receive additional specialist safeguarding training and regularly access updates relating to harmful sexual behaviour and child-on-child abuse.

10. Brook Sexual Behaviours Traffic Light Tool

The Federation uses the Brook Sexual Behaviours Traffic Light Tool as part of its safeguarding practice.

The Traffic Light Tool is a nationally recognised framework that supports professionals in distinguishing between developmentally typical, concerning and harmful sexual behaviours.

Green behaviours are developmentally expected and generally reflect healthy child development.

Amber behaviours are concerning behaviours that require further exploration, information gathering and assessment of the wider context.

Red behaviours are harmful, abusive or exploitative behaviours requiring immediate safeguarding intervention.

The Brook Traffic Light Tool supports professional judgement but does not replace safeguarding procedures or statutory guidance.

11. Recording and Monitoring on CPOMS

Within Park Schools Federation, all incidents involving sexualised behaviour, whether considered developmentally typical, concerning or harmful, will be recorded on CPOMS.

Recording all incidents enables the DSL to identify patterns, monitor behaviour over time, assess risk and ensure appropriate support is provided.

Records should:

- Be completed as soon as possible.
- Be factual and objective.
- Use the child's own words wherever possible.
- Include dates, times and locations.
- Record actions taken and decisions made.
- Include body maps where appropriate.

12. Reporting Procedures

Any member of staff receiving a disclosure or observing concerning behaviour must:

1. Listen carefully and calmly.
2. Reassure the child they have done the right thing.
3. Avoid leading questions.
4. Never promise confidentiality.
5. Explain what will happen next.
6. Record the concern on CPOMS.
7. Inform the DSL immediately.

13. Investigation Procedures

The DSL will:

- Review all available information.
- Assess immediate safeguarding needs.
- Speak with relevant individuals where appropriate.
- Consult safeguarding partners as necessary.
- Maintain accurate records.
- Determine next steps.
- Ensure support is provided.

The welfare of all children involved will remain paramount throughout any investigation.

14. Risk Assessment

A risk assessment may be completed where concerns involve harmful sexual behaviour.

Risk assessments will consider:

- The nature of the concern.
- Risks to the victim.
- Risks to other pupils.
- Supervision arrangements.
- Classroom and playground arrangements.
- Transport arrangements.

- Online safety considerations.
- Required support and interventions.

Risk assessments will be reviewed regularly.

15. Support for Victims

Victims will be listened to, believed and supported.

Support may include:

- Pastoral support.
- Emotional wellbeing support.
- Counselling.
- Safeguarding plans.
- External agency involvement.
- Regular review meetings.

16. Support for Children Displaying Harmful Sexual Behaviour

The Federation recognises that children displaying harmful sexual behaviour may themselves be vulnerable and require support.

Support may include:

- Early Help.
- Behaviour support.
- Therapeutic intervention.
- Social Care involvement.
- Specialist agency support.

17. Multi-Agency Working

The Federation works closely with:

- Children's Social Care.
- Derbyshire Police.
- Early Help Services.

- Health Professionals.
- Derby and Derbyshire Safeguarding Children Partnership.
- Specialist safeguarding services.

Partnership working helps ensure children receive coordinated and effective support.

18. Investigation Outcomes

Following investigation, outcomes may include:

Manage Internally

Low-level concerns may be managed through pastoral support, behaviour interventions and restorative approaches.

Early Help

Where additional support is required, an Early Help assessment may be initiated.

Children's Social Care Referral

Referrals will be made where a child has been harmed or is at risk of harm.

Police Referral

Incidents involving potential criminal offences will be referred to the Police in accordance with KCSIE 2025 and DDSCP procedures.

19. Derbyshire Safeguarding Procedures

The Federation follows the procedures and guidance published by the Derby and Derbyshire Safeguarding Children Partnership (DDSCP).

Staff should access current procedures through the DDSCP website and follow all local safeguarding arrangements, referral pathways and escalation procedures.

20. Monitoring and Review

The DSL and Senior Leadership Team will monitor safeguarding incidents, patterns and trends relating to harmful sexual behaviour.

This policy will be reviewed annually or sooner if changes to legislation, local procedures or safeguarding guidance require amendment.

Appendix A – Brook Traffic Light Summary

Green	Amber	Red
Developmentally expected behaviours	Concerning behaviours requiring assessment	Harmful or abusive behaviours requiring intervention
Monitoring and education	Further investigation and support	Immediate safeguarding action
No significant safeguarding concern	Wider context explored	Referral to appropriate agencies considered

Appendix B – Reporting Flowchart

Concern observed or disclosed



Record on CPOMS immediately



Inform DSL



DSL reviews concern



Brook Traffic Light assessment undertaken



Risk assessment completed where necessary



Decision made:

- Internal support
- Early Help
- Children's Social Care
- Police referral



Ongoing monitoring and review

Appendix C – Useful Links

Brook Sexual Behaviours Traffic Light Tool:

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

Derby and Derbyshire Safeguarding Children Partnership:

<https://www.ddscp.org.uk/staff-and-volunteers/policies-and-procedures/>

Keeping Children Safe in Education:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Working Together to Safeguard Children:

<https://www.gov.uk/government/publications/working-together-to-safeguard-children>