Lord's Independent School

Lord's Independent School

Child-on-Child Abuse Policy(Managing Allegations Against Other Pupils Including Sexual Harassment and Sexual Violence)

Field	Detail
Policy owner	Headteacher
Date adopted	02/09/2026
Next review date	02/09/2027
Reviewed by	Proprietor
Regulatory framework	KCSIE 2024; Working Together to Safeguard Children 2023; ISS 2014; Equality Act 2010
Review schedule	Annual

1. Context and Purpose

Keeping Children Safe in Education 2024 (KCSIE 2024) requires all schools to have in place clear procedures to minimise the risk of child-on-child abuse and to set out how allegations will be investigated and dealt with. This policy fulfils that requirement for Lord's School and applies to all pupils aged 11 to 18.

At Lord's School, we believe all children have a right to attend school and learn in a safe environment, free from harm by adults and by other children. This policy recognises that child-on-child abuse can and does happen, including in secondary schools, and that the school must be ready to respond when it does.

"Safeguarding is everyone's responsibility."

2. Definition: What Is Child-on-Child Abuse?

Child-on-child abuse occurs when a child is harmed by one or more other children. It can take many forms and exists on a spectrum from developmentally inappropriate behaviour to serious criminal conduct. Forms of child-on-child abuse include:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Physical abuse, including assault, hitting, kicking and initiation or hazing rituals
- Sexual violence, including rape, assault by penetration and sexual assault
- Sexual harassment: unwanted conduct of a sexual nature, including verbal harassment, sharing sexual images without consent ('upskirting' or sharing intimate images), and online sexual harassment
- Causing someone to engage in sexual activity without consent
- Consensual and non-consensual sharing of nude or semi-nude images and/or videos, also referred to as 'sexting'
- Coercive control, coercion and exploitation
- Online abuse, including grooming by peers, exploitation via social media, and technology-facilitated abuse

Understanding where behaviour sits on the spectrum between 'normal' development and abuse is essential to responding proportionately and appropriately.

3. Vulnerable Groups

All children can be at risk; however, the school recognises that some groups are at heightened risk of child-on-child abuse, including:

- Children who have experienced abuse within their family or who are living with domestic violence
- Children in care or previously looked after
- Children who go missing from education
- Children with SEND or additional needs
- Children who identify as or are perceived to be LGBTQ+

- Girls, who research indicates are more frequently subjected to sexual harassment and sexual violence by peers
- Boys, who may be less likely to report intimate relationship abuse or peer exploitation

The school will take additional safeguarding steps for these groups as appropriate.

4. Related Policies

This policy must be read in conjunction with:

- Child Protection and Safeguarding Policy
- E-Safety Policy
- Anti-Bullying Policy
- Behaviour Policy
- RSE Policy

5. Online Child-on-Child Abuse

Child-on-child abuse increasingly occurs online, both within and outside school hours. Technology-facilitated abuse includes:

- Sending threatening, humiliating or abusive messages via social media, messaging apps or gaming platforms
- Non-consensual sharing of intimate images ('revenge porn') and upskirting
- Creating or sharing 'deepfake' intimate images using artificial intelligence tools
- Online grooming by peers or older pupils for sexual or criminal exploitation
- Coercing peers into producing sexual imagery via online platforms

The school's jurisdiction extends to online child-on-child abuse that has a material impact on the school community, regardless of where it occurs. The school will record and respond to reports of online abuse with the same seriousness as in-person abuse.

6. Reporting and Initial Response

6.1 Receiving a Report

Any pupil can report a concern about child-on-child abuse to any member of staff. Staff who receive a report of child-on-child abuse must:

- Listen carefully and take the report seriously without minimising, dismissing or casting doubt on what the child is saying
- Not promise confidentiality, but explain that the information will be shared only with people who need to know to keep the pupil safe
- Make an accurate, written record of what was said and reported, using the child's own words as far as possible, and noting the date and time

- Report to the Designated Safeguarding Lead (DSL) immediately, or the Deputy DSL in their absence

Staff must not investigate themselves or attempt to resolve the matter without involving the DSL.

6.2 DSL Initial Response

The DSL will make an immediate risk and needs assessment that considers the risk to the victim, the alleged perpetrator and any other children involved. This assessment will inform whether and how the school proceeds. The DSL will consider:

- Whether the police or children's social care must be informed immediately
- What immediate protective measures are required, including any temporary measures regarding contact between the alleged victim and alleged perpetrator
- What support is needed for the victim and whether a referral to specialist services is appropriate
- Whether the alleged perpetrator also has unmet needs that require a referral

7. Responding to Reports of Sexual Violence and Sexual Harassment

When the DSL is made aware of a report of sexual violence or sexual harassment, they will consider the matter in line with Part Five of KCSIE 2024. The DSL will always complete a risk assessment and will refer to children's social care and/or the police where the threshold for referral is met.

In deciding how to proceed, the school will balance the victim's wishes with its duty to protect all children. The school will not unreasonably follow the victim's wishes where doing so would place other children at risk.

Where sexual violence or sexual harassment is found to have occurred, the school will:

- Take immediate steps to ensure the victim is not required to come into contact with the alleged perpetrator, including reviewing seating plans, timetables and movement around the school
- Ensure the victim receives appropriate pastoral support and, if they wish, is referred to specialist external support services
- Consider what action is appropriate regarding the alleged perpetrator, including disciplinary sanctions, and whether safeguarding referrals are required for the perpetrator
- Keep a full written record of all decisions made and the rationale for them

8. Sharing of Nude or Semi-Nude Images ('Sexting')

Where the school becomes aware of the consensual or non-consensual sharing of nude or semi-nude images involving pupils, the DSL will follow the UKCIS (UK Council for Internet Safety) guidance 'Sharing nudes and semi-nudes: advice for education settings'. Such incidents will be treated as a safeguarding matter in the first instance. The school will not view images unnecessarily and will not use devices to store or distribute images. Where

images involve a child under 18, the creation or distribution of such images constitutes a criminal offence.

9. Confidentiality and Information Sharing

Information about incidents of child-on-child abuse will be shared on a need-to-know basis in line with the school's data protection obligations and the principles set out in the DfE 'Information Sharing' advice 2024. The school will not share information about an investigation more widely than is necessary to protect the welfare of those involved.

10. Support, Education and Prevention

Lord's School takes a proactive approach to preventing child-on-child abuse through:

- An RSE curriculum that addresses healthy relationships, consent, online safety and the harms of sexual violence and harassment
- Regular PSHE lessons that build pupils' resilience, critical thinking and ability to seek help
- Staff training on recognising and responding to child-on-child abuse, updated annually
- A clear reporting culture that encourages pupils to speak out and trust adults to respond appropriately
- Working with external specialist agencies where appropriate, including the police and NSPCC

11. Policy Review

This policy will be reviewed annually and updated in line with any revisions to KCSIE and other statutory guidance. The DSL is responsible for keeping this policy current and for ensuring all staff are familiar with it.