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1. Purpose

Storyybrook is fully committed to safeguarding and promoting the welfare of all pupils. This includes recognising that children can abuse other children and that such behaviour must be taken seriously and responded to appropriately. Child-on-child abuse is understood as a safeguarding issue and will never be dismissed as “banter”, “part of growing up” or normal peer interaction.

As a specialist SEMH setting, Storyybrook recognises that pupils may present with complex social, emotional and behavioural needs, which can impact how they relate to others. This policy sets out a clear and consistent approach to preventing, identifying and responding to child-on-child abuse, ensuring that all pupils are supported within a relational, trauma-informed and safeguarding-led framework.

2. Scope of this policy

This policy applies to all individuals working at or on behalf of Storyybrook, including teaching staff, support staff, leaders, governors, volunteers and visitors. It applies across all aspects of school life, including the curriculum, behaviour and relationships, SEMH provision, online environments and wider safeguarding systems.

Child-on-child abuse is addressed within the school’s wider safeguarding framework and should be read alongside the Safeguarding and Child Protection Policy. All staff have a responsibility to remain vigilant, understand the indicators of abuse, respond appropriately and report concerns without delay. The consistent implementation of this policy is supported through training, supervision and leadership oversight.

3. Legal framework

This policy has been developed with regard to relevant legislation, statutory guidance and national safeguarding advice, including:

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Children Act 1989
- Children Act 2004
- Education Act 2002
- Equality Act 2010
- Human Rights Act 1998
- Sexual Offences Act 2003
- Voyeurism (Offences) Act 2019
- Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance
- UK Council for Internet Safety guidance, Sharing nudes and semi-nudes: advice for education settings working with children and young people
- relevant Department for Education guidance relating to safeguarding, online safety, behaviour and relationships.





Storyybrook recognises child-on-child abuse as a safeguarding issue. The school will take a proactive, child-centred approach to preventing, identifying and responding to concerns, with the welfare and best interests of children remaining central to decision-making.

Safeguarding responses will take account of the needs and circumstances of all children involved. This includes the child who has experienced or may have experienced harm, the child who is alleged to have caused harm, and any other children who may have been affected or may be at risk.

The school will work with children's social care, the police and other relevant agencies where appropriate and will ensure that safeguarding action is proportionate, appropriately recorded and consistent with statutory guidance.

Storyybrook will keep its arrangements under review and respond to changes in legislation, statutory guidance and national safeguarding advice.

4. Definitions and forms of child-on-child abuse

Child-on-child abuse refers to any form of abuse between children. It can occur between two children or within a group, between children of any age or sex, and may take place inside or outside school, online or offline. A child may experience abuse from one child or from multiple children, and children may experience different forms of abuse simultaneously.

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

- sexual violence
- sexual harassment, including online sexual harassment
- causing someone to engage in sexual activity without consent
- consensual and non-consensual sharing of nude and semi-nude images or videos
- upskirting
- physical abuse, including hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- emotional abuse
- bullying, including cyberbullying, prejudice-based bullying and discriminatory bullying
- coercive or controlling behaviour
- abuse within intimate personal relationships between children
- initiation or hazing-type violence and rituals
- exploitation, threats, intimidation or blackmail
- behaviour intended to humiliate, harm, frighten or control another child
- AI-generated or digitally manipulated sexual imagery, including deepfakes or other synthetic media.

Abuse may be a one-off incident or a pattern of behaviour. It may involve an imbalance of power based on age, size, status, popularity, ability, SEND, vulnerability, access to technology or other factors.

Storyybrook recognises that child-on-child abuse may affect any child and that children may experience harm from one or more other children. Staff must not make assumptions about who may experience or cause harm based on age, sex, SEND, SEMH needs, background or other characteristics.





All forms of child-on-child abuse are treated as safeguarding concerns and will be responded to in accordance with Storyybrook's safeguarding procedures. Behaviour will not be minimised because it occurred online, was presented as a joke, involved digitally generated content or because the child who caused harm has additional needs.

Harmful sexual behaviour

Storyybrook recognises that sexual behaviour between children exists on a continuum and must be understood developmentally and contextually. Behaviour will be considered in light of the children's ages, developmental stages, understanding, experiences, vulnerabilities, SEND, SEMH and communication needs, as well as the nature and context of the behaviour.

The school may use recognised frameworks, including Hackett's continuum and the Brook Traffic Light Tool, to support professional judgement when distinguishing between developmentally expected, inappropriate, problematic and abusive sexual behaviour.

When assessing sexual behaviour, staff and the DSL will consider factors including:

- the ages and developmental stages of the children involved
- the nature, frequency and context of the behaviour
- consent and the children's understanding of consent
- any difference in power, age, ability, status or developmental understanding
- coercion, pressure, manipulation, intimidation or secrecy
- the impact of the behaviour on the child or children involved
- whether the behaviour is isolated, repeated, escalating or forms part of a wider pattern
- whether there are concerns about abuse, exploitation, exposure to sexual content or other adverse experiences
- whether the behaviour raises safeguarding concerns about any of the children involved.

SEND, SEMH needs, trauma or developmental differences may be highly relevant to understanding why behaviour has occurred and to determining the most appropriate response. They do not, however, explain away, excuse or minimise harm experienced by another child.

Equally, sexual behaviour between children will not automatically be labelled harmful or abusive without appropriate assessment. Developmentally expected behaviour will be distinguished from inappropriate, problematic or abusive behaviour through careful consideration of the individual children, the context and the circumstances.

Where behaviour is assessed as inappropriate, problematic or abusive, Storyybrook will respond proportionately to safeguard all children involved, address the behaviour, provide appropriate support and reduce the risk of further harm. All concerns about potentially harmful sexual behaviour will be referred to the DSL for assessment and appropriate action.

Consent, coercion and power

When considering sexual behaviour between children, Storyybrook will take account of consent in an age and developmentally appropriate way. Staff will not assume that a child has consented simply because they did not say "no", did not resist or because the children are friends or peers.





The DSL will consider:

- whether each child understood the nature of the interaction
- the age and developmental stage of the children involved
- the child's capacity to understand and communicate agreement or refusal
- any SEND, communication needs or vulnerabilities that may affect understanding or communication
- whether there was any pressure, coercion, manipulation, intimidation, threat or secrecy
- whether there was an imbalance of power, including differences in age, development, ability, status, vulnerability or social influence
- whether consent was freely given and could be withdrawn.

For primary-aged children, these considerations will be approached sensitively and developmentally. Staff will use language appropriate to the child's age, understanding and communication needs and will not expect children to demonstrate an adult understanding of consent.

A child's additional needs, limited understanding or difficulty communicating does not reduce their right to be protected from harmful sexual behaviour. Equally, the assessment of another child's behaviour will take account of their developmental understanding and individual needs rather than assuming intent.

Terminology

The terminology used when responding to child-on-child abuse will be considered carefully and sensitively. While terms such as 'victim' and 'alleged perpetrator' may be used within safeguarding guidance and professional processes, Storyybrook recognises that not all children will identify with these terms and that they should not define a child.

Where appropriate, the school will use language such as "the child who has experienced harm" and "the child alleged to have caused harm". Language will remain factual, non-judgemental and appropriate to the circumstances, particularly where concerns have not yet been substantiated.

5. Key principles

The school's approach to child-on-child abuse is underpinned by a clear set of safeguarding and relational principles. These ensure that all responses are consistent, proportionate and focused on the needs of the child.

At Storyybrook, safeguarding is everyone's responsibility and all staff understand their role in identifying and responding to concerns. Early identification is essential, and all concerns, including low-level concerns, are taken seriously and acted upon. As a specialist SEMH setting, the school adopts a trauma-informed approach, recognising that behaviour may be a form of communication and that pupils may present with complex underlying needs.

All responses are child-centred and proportionate, balancing support and accountability. The school promotes a culture of inclusion, respect and belonging, reducing vulnerability and supporting positive relationships. Staff are expected to demonstrate professional

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curiosity, avoid assumptions and maintain a consistent and vigilant approach to safeguarding.

Storyybrook adopts a clear zero-tolerance approach to all forms of child-on-child abuse. Abuse is never accepted, minimised or dismissed as part of normal peer interaction. All incidents are taken seriously and addressed promptly and appropriately.

However, as a specialist SEMH setting, the school also recognises that pupils displaying harmful behaviours may have their own vulnerabilities, unmet needs or experiences of trauma. Therefore, while the behaviour itself is never tolerated, responses remain safeguarding-led, relational and proportionate.

Zero tolerance does not mean that responses will automatically be punitive or exclusionary. Storyybrook will respond to each incident according to its nature, seriousness, context and impact, taking account of the individual needs and circumstances of the children involved. Safeguarding, safety and accountability will remain central, alongside appropriate support to help children understand the impact of their behaviour, develop safer ways of relating to others and reduce the risk of further harm.

This means that all pupils involved are supported appropriately, with a focus on safety, accountability, understanding and positive change. The school maintains clear boundaries and expectations while ensuring that responses do not stigmatise or exclude pupils unnecessarily.

Staff maintain a culture of vigilance and professional curiosity, recognising that child-on-child abuse can occur in any setting and that early identification is essential.

Staff will maintain an attitude of “it could happen here” in relation to child-on-child abuse. The absence of reports does not mean that abuse is not occurring. Staff must remain alert to signs, indicators, changes in behaviour and patterns of concern, including where children do not recognise their experiences as abusive or do not feel able to report them. Any concern about a child's safety or welfare must be reported in accordance with the school's safeguarding procedures.

6. Understanding child-on-child abuse within an SEMH setting

Child-on-child abuse can take many forms, including sexual violence and harassment, physical abuse, emotional abuse, bullying (including online), harmful sexual behaviour and abuse within relationships. It can occur both online and offline and can have a significant impact on pupils' emotional wellbeing, safety and ability to engage in learning.

Within an SEMH context, staff understand that behaviour must be considered within the wider context of the pupil's experiences, developmental stage and emotional needs. Pupils may have experienced trauma, disrupted relationships or a lack of consistent boundaries, which can influence how they interact with others.

Staff recognise that harmful behaviours may reflect unmet needs, confusion or exposure to





inappropriate experiences. However, this does not minimise the seriousness of the behaviour. Instead, it ensures that responses are both safeguarding-led and supportive, addressing the needs of all pupils involved while maintaining clear expectations and boundaries.

7. Roles and responsibilities

The effective implementation of this policy relies on clear roles and shared responsibility across the school. The Headteacher, who is also the Designated Safeguarding Lead (DSL), has overall responsibility for safeguarding and for managing all cases of child-on-child abuse. The DSL ensures that concerns are assessed appropriately, recorded accurately and responded to in line with safeguarding procedures, including liaison with external agencies where necessary.

All staff have a responsibility to remain vigilant, identify concerns and report them immediately. Staff must not attempt to investigate concerns themselves but must follow the school's safeguarding procedures at all times. Staff are also responsible for creating a safe and respectful environment, modelling appropriate behaviour and supporting pupils in line with the school's relational approach.

8. Identifying concerns considering SEMH needs

At Storyybrook, staff understand that indicators of child-on-child abuse may present in a range of ways and are often subtle. These may include changes in behaviour, emotional distress, inappropriate sexualised language or behaviour, peer conflict, withdrawal or online concerns.

In an SEMH setting, these indicators may also present through dysregulation, rigid thinking, attachment behaviours or escalation when challenged. Staff must consider the wider context of the pupil's needs and experiences and apply professional judgement when identifying concerns.

All concerns, including low-level concerns or patterns over time, must be reported and recorded. Early identification is essential in preventing escalation and ensuring appropriate support.

9. Responding to concerns and disclosures

When a concern is identified or a child makes a disclosure, staff must respond in a calm, supportive and non-judgemental manner. The child's immediate safety and welfare must remain the priority.

Staff should:

- listen carefully and allow the child to speak in their own words
- take the child seriously and reassure them that they have done the right thing by speaking to an adult
- avoid expressing shock, disbelief or judgement





- avoid asking leading, probing or unnecessary questions
- only ask questions where necessary to clarify what the child is saying
- explain that information cannot be kept confidential and will need to be shared with the DSL and, where necessary, other people who can help keep them or others safe
- not promise confidentiality
- not ask the child to repeatedly recount their experience
- make a factual record as soon as possible, using the child's own words wherever possible
- report the concern immediately to the DSL or DDSL in accordance with the school's safeguarding procedures.

A child may ask that information is not shared or that no action is taken. Staff must not agree to this and must still report the concern to the DSL. The child's wishes and feelings will be heard and taken seriously, but they cannot override the school's responsibility to safeguard children.

Staff must not investigate the concern, question other children, attempt to establish whether an allegation is true or resolve the matter themselves. The DSL will determine the appropriate safeguarding response and any further action required.

10. DSL response and decision-making

The DSL will take the lead in responding to all concerns relating to child-on-child abuse. Each concern will be considered individually, with decisions based on the circumstances of the incident, the needs of the children involved and the wider safeguarding context.

On receiving a report, the DSL will first consider whether any child is at immediate risk of harm and whether urgent action is required to secure their safety. This may include changes to supervision or arrangements within school and, where necessary, seeking immediate advice or assistance from children's social care or the police.

In determining the appropriate response, the DSL will consider:

- the wishes and feelings of the child who has experienced or may have experienced harm
- the nature, seriousness and circumstances of the reported behaviour
- the ages and developmental stages of the children involved
- SEND, SEMH, communication needs, vulnerabilities and capacity to understand the behaviour and its impact
- any difference in age, developmental understanding, social status, physical strength or other potential power imbalance
- whether there is evidence of coercion, intimidation, manipulation, exploitation or threats
- whether the behaviour appears to be isolated, repeated or part of a wider pattern
- whether sexual behaviour is developmentally expected, inappropriate, problematic or abusive
- whether the concern involves online behaviour, digital communication, imagery, AI-generated or manipulated content, or activity occurring outside school
- whether other children have been affected, involved or may be at risk
- any relevant previous safeguarding, behaviour or pastoral concerns
- any contextual safeguarding concerns, including peer-group dynamics, particular locations, community factors or online environments





- the risk of further or escalating harm
- whether advice, assessment or referral is required from children's social care, the police or another relevant agency.

The DSL will take account of the child's wishes and feelings when deciding how to proceed and will explain, in an age and developmentally appropriate way, what is likely to happen next. However, the DSL will not agree to confidentiality or inaction where this would be inconsistent with the school's safeguarding responsibilities.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the DSL will make a referral to children's social care in accordance with Storyybrook's safeguarding procedures. Where a report may involve a criminal offence, the DSL will consider the need to involve the police and will seek appropriate advice where necessary.

The DSL will ensure that consideration is given to the safeguarding and support needs of all children involved, including the child who has experienced harm, the child alleged to have caused harm and any other children who may have been affected or may be at risk. The fact that a child may have caused harm does not remove the possibility that they may also have safeguarding needs of their own.

All decisions, the rationale for those decisions, actions taken, advice sought and referrals made will be recorded clearly on the school's safeguarding system. The DSL will keep the situation under review and will revise safeguarding arrangements where circumstances, information or levels of risk change.

11. Risk assessment and safety planning

Following a report of child-on-child abuse, the DSL will undertake and record an appropriate risk assessment to identify any immediate or ongoing risks and determine the measures required to safeguard the children involved and the wider pupil group.

The risk assessment will consider the needs and safety of the child who has experienced or may have experienced harm, the child alleged to have caused harm, and any other children who may have been affected or may be at risk.

Depending on the circumstances, the assessment and resulting safety plan may consider:

- classroom arrangements and pupil groupings
- movement around the school and transitions between activities
- breaktimes, lunchtimes and other less structured periods
- arrival and departure arrangements
- school transport, where applicable
- toilets and changing arrangements, where relevant
- online contact, messaging, social media or other digital interaction
- staffing levels and supervision
- extracurricular activities, educational visits and off-site provision
- opportunities for contact between the children involved
- known triggers, vulnerabilities or contextual risks
- additional support required by any child involved
- the safety and wellbeing of other pupils.





Any arrangements will be proportionate to the identified risk and will take account of the children's ages, developmental stages, SEND, SEMH and communication needs.

Where possible, safeguarding arrangements should not place the burden of managing risk on the child who has experienced harm. The school will carefully consider the impact of changes to classes, groups, activities or routines and will avoid arrangements that unnecessarily isolate, disadvantage or disrupt the education of that child. The child's wishes and feelings will be considered when determining appropriate safety measures.

The needs of the child alleged to have caused harm will also be assessed. Appropriate supervision, boundaries and support will be put in place to reduce the risk of further harm, while recognising that this child may have safeguarding, developmental or therapeutic needs of their own.

Risk assessments and safety plans will be treated as live documents. They will be reviewed following significant developments or incidents and at appropriate intervals until the DSL is satisfied that the identified risks have reduced or been appropriately managed.

All decisions, actions and reviews will be clearly recorded, including the rationale for the measures put in place.

12. Supporting all children involved

Storyybrook recognises that child-on-child abuse can have a significant and lasting impact and that all children involved may require appropriate, individualised support. The safety and wellbeing of the child who has experienced or may have experienced harm will remain a priority throughout the school's response.

The child who has experienced harm will be listened to, taken seriously and supported to feel safe both physically and emotionally. The school will consider the child's wishes and feelings and ensure that they understand what support is available and what action is being taken. Support will be appropriate to the child's age, developmental stage, SEND, SEMH and communication needs.

Support may include:

- access to a trusted adult
- pastoral, therapeutic or emotional wellbeing support
- reasonable adjustments to routines, learning or the school environment
- additional supervision or safety planning
- support with relationships and peer interactions
- support from external agencies or specialist services where appropriate
- regular opportunities for the child to communicate how safe they feel and whether arrangements remain effective.

The child will not be blamed or made to feel responsible for the harm they have experienced. Support will not be dependent upon the outcome of a police, children's social care or other external investigation and will continue for as long as it is considered necessary.





Supporting a child alleged to have caused harm

A child who has caused or is alleged to have caused harm will also be appropriately safeguarded and supported. Storyybrook recognises that harmful behaviour may indicate unmet needs or that the child may themselves be experiencing or have experienced abuse, exploitation, trauma, neglect, exposure to harmful material or other safeguarding concerns.

The DSL will therefore consider whether the behaviour raises concerns about that child's own safety or welfare and whether further assessment, early help, children's social care involvement or other specialist support is required.

Support will not remove accountability for harmful behaviour. Children will be helped, in an age and developmentally appropriate way, to understand boundaries, the impact of their behaviour, safer ways of interacting with others and how to reduce the likelihood of further harm. Appropriate behaviour responses or consequences may be used alongside safeguarding and therapeutic support where necessary.

Providing safeguarding, therapeutic or educational support to a child who has caused or is alleged to have caused harm does not minimise the seriousness of the behaviour or diminish the harm experienced by another child. Storyybrook will maintain clear boundaries while responding to the needs and vulnerabilities of all children involved.

Other children affected

The DSL will also consider whether other children have witnessed the incident, been drawn into it, experienced related harm or may be at risk. Where appropriate, individual or group support, increased supervision, curriculum work or other safeguarding measures will be put in place.

Sexual violence and sexual harassment

All reports of sexual violence or sexual harassment between children will be taken seriously and referred immediately to the DSL. Such behaviour will never be dismissed as “banter”, “part of growing up” or an inevitable part of relationships between children.

The DSL will consider the immediate safety and safeguarding needs of all children involved and will determine what action is required. The response will be child-centred, proportionate and informed by the nature and seriousness of the concern, the ages and developmental stages of the children, their SEND and communication needs, any power imbalance or coercion, and the wishes and feelings of the child who has experienced or may have experienced harm.

Where appropriate, the DSL will:

- complete or update an individual risk assessment and safety plan
- consider whether children's social care should be contacted or a referral made
- consider whether the police should be involved and seek appropriate advice where necessary
- put arrangements in place to minimise the possibility of further contact or harm
- consider the safeguarding and support needs of the child alleged to have caused harm
- ensure appropriate ongoing support for the child who has experienced harm





- consider whether other children may have witnessed, experienced or be at risk of similar behaviour
- keep arrangements under regular review as circumstances or levels of risk change.

Information will be shared only with those who need it for safeguarding, support or the proper management of the concern. Children will not be promised confidentiality. Staff will be sensitive to the impact that wider knowledge of an incident may have on the children involved and will challenge gossip, bullying, harassment or victimisation arising from a report.

Where changes to school arrangements are necessary to safeguard children, the school will carefully consider the impact of those changes. The child who has experienced or may have experienced harm should not automatically be moved from a class, group or activity or otherwise experience unnecessary disruption to their education. Wherever possible, safeguarding arrangements will be designed so that the burden of managing risk does not fall on that child.

Support and safeguarding arrangements will continue for as long as they are required and will not be dependent upon the outcome of any police, children's social care or other external investigation.

13. Managing incidents

All incidents of child-on-child abuse will be managed on a case-by-case basis, with the safety and welfare of children remaining the primary consideration. The school's response will be proportionate to the nature, seriousness and circumstances of the concern and the needs of the children involved.

Where necessary, immediate action will be taken to prevent further harm. This may include separating children, increasing supervision, adapting routines or activities, or implementing other measures identified through the school's risk assessment and safety planning process.

The DSL will consider whether:

- children's social care should be contacted or a referral made
- the police should be contacted or advice sought
- additional safeguarding or therapeutic support is required for any child involved
- a risk assessment or safety plan should be implemented or reviewed
- other children may have been affected or may be at risk
- action is required under the school's Behaviour and Relationships Policy
- parents or carers should be informed, taking account of any safeguarding reasons why this may not be appropriate
- external professional or multi-agency support is required.

Safeguarding action and behaviour action are not mutually exclusive. Where appropriate, a safeguarding response and a behaviour response may operate alongside one another. Any behaviour consequences will be proportionate, appropriate to the child's age and developmental understanding, and considered alongside their SEND, SEMH needs and individual circumstances.

The presence of additional needs, trauma or vulnerabilities will inform the school's understanding and response but will not be used to minimise harmful behaviour or its impact

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on another child. Equally, behaviour consequences will not replace consideration of whether a child has safeguarding or support needs of their own.

Where an allegation has been made, the school will not assume guilt or predetermine the outcome of any safeguarding, social care or police process. Measures put in place while concerns are being assessed are safeguarding measures and should not be regarded as a determination that an allegation has been substantiated.

Any response will seek to protect the child who has experienced or may have experienced harm without unfairly placing responsibility on them to manage the risk or unnecessarily disrupting their education. The needs, wishes and feelings of the child will be considered alongside the school's responsibility to safeguard all pupils.

The DSL will ensure that safeguarding arrangements, support and any behaviour measures are reviewed as necessary and adjusted in response to changes in circumstances or risk. Decisions, actions taken and the rationale for them will be clearly recorded.

The DSL will also consider individual incidents alongside wider safeguarding and behaviour records to identify patterns, emerging themes or contextual safeguarding risks. This may include patterns involving particular pupils or groups, peer dynamics, locations or times of day, protected characteristics, repeated or escalating behaviours, or particular online platforms, group chats, gaming environments or other digital spaces.

Where a pattern or emerging concern is identified, the school will consider whether wider action is required. This may include changes to supervision, staffing or routines, targeted curriculum or preventative work, individual or group support, additional staff training, changes to the physical or online environment, or involvement of external agencies where appropriate.

14. Online behaviour and abuse

Storyybrook recognises that child-on-child abuse can occur wholly or partly online and that online and offline safeguarding concerns are often interconnected. Online abuse may occur through social media, messaging services, group chats, gaming platforms, forums, video or image-sharing services, or other digital technologies.

Online child-on-child abuse may include:

- cyberbullying, harassment or discriminatory abuse
- sexual harassment or sexually inappropriate communication
- consensual or non-consensual sharing of nude or semi-nude images or videos
- threats or pressure to create, send or share sexual imagery
- threats to share existing images or recordings
- digitally manipulating or altering images of another child
- creating or sharing AI-generated sexual imagery, deepfakes, “deep nudes” or other synthetic sexual content depicting or appearing to depict a child
- impersonating another child or using false or compromised accounts
- coercion, intimidation, blackmail or extortion
- financially motivated sexual extortion, sometimes referred to as “sextortion”
- grooming, sexual exploitation or attempts to manipulate a child into sexual activity or the creation of sexual imagery
- deliberately exposing another child to harmful or sexual content





- using digital technology to humiliate, threaten, control, isolate or exploit another child.

Staff must recognise that an incident which initially appears to involve children only may involve an adult or other offender posing as a child. Concerns involving grooming, exploitation, extortion, impersonation or unknown online contacts will therefore be assessed carefully by the DSL, with police and children's social care involvement considered where appropriate.

AI-generated, digitally manipulated or synthetic imagery will be treated as a safeguarding concern in the same way as other harmful sexual imagery. The fact that an image is not a genuine photograph of the child does not mean that its creation, possession, threatened sharing or distribution is harmless. UKCIS guidance specifically recognises digitally manipulated and AI-generated nude or semi-nude imagery.

Online behaviour does not need to take place during the school day, on school premises or using school-owned technology for Storyybrook to take safeguarding action. Where online behaviour occurring outside school affects the safety, welfare or wellbeing of a pupil, impacts relationships within school, or creates a risk of further harm, the school will respond in accordance with its safeguarding procedures.

All concerns about online child-on-child abuse must be reported to the DSL. The DSL will consider the nature and seriousness of the concern, the children involved, the possibility of wider exploitation or adult involvement, whether other children may be at risk and whether advice or referral to children's social care or the police is required.

Responses will be coordinated with the school's Safeguarding and Child Protection Policy, Online Safety Policy, Filtering and Monitoring Policy and Artificial Intelligence (AI) Policy where relevant.

Responding to incidents involving nudes and semi-nudes

Any incident involving the creation, sharing, possession or threatened sharing of nude or semi-nude imagery involving a child must be treated as a safeguarding concern and reported immediately to the DSL.

Staff must not:

- intentionally view the imagery
- copy, print, share, forward, store or save the imagery
- ask a child to send, share or download the imagery to them
- ask a child to show the imagery to them
- delete the imagery or ask the child to delete it
- investigate the imagery or question children in detail about its content
- share information about the incident unnecessarily with other staff, pupils, parents or carers.

If a member of staff has inadvertently viewed imagery, for example because a child has shown it to them before they could prevent this, they must report this immediately to the DSL and must not copy, save or share the imagery.





The DSL will lead the response in accordance with current UKCIS guidance. Wherever possible, decisions will be based on information provided by the children involved rather than viewing the imagery.

In exceptional circumstances, the DSL may determine that viewing imagery is necessary in order to safeguard a child. Any decision to view imagery must be based on professional judgement and current UKCIS guidance, be limited to what is strictly necessary and be appropriately recorded. Imagery must never be copied, printed, shared, stored or saved.

The DSL will consider:

- the immediate safety and welfare of all children involved
- how and why the imagery was created or shared
- whether there was consent, coercion, pressure, manipulation, exploitation, blackmail or threats
- whether the imagery has been shared more widely
- whether an adult or unknown person may be involved
- the ages, developmental stages, SEND, communication needs and vulnerabilities of the children involved
- whether other children may be at risk
- whether parents or carers should be informed
- whether children's social care and/or the police should be contacted or a referral made
- what ongoing safeguarding, support and risk management arrangements are required.

Parents and carers will normally be informed at an early stage unless there is good reason to believe that doing so would place a child at risk of harm. Where appropriate, advice will be sought from children's social care or the police.

The school's response will be proportionate and child-centred. Children will not be blamed or shamed for creating or sharing imagery, and appropriate safeguarding and support will be provided to all children involved.

All decisions, actions, advice sought and referrals will be recorded on the school's safeguarding system.

15. Prevention

Storyybrook recognises that preventing child-on-child abuse is an essential part of safeguarding. The school will promote a culture in which respectful relationships, appropriate boundaries, inclusion and speaking up about concerns are understood and reinforced throughout school life.

Through Relationships Education, PSHE, SMSC, online safety education and the wider curriculum, pupils will be taught in an age and developmentally appropriate way about:

- healthy and unhealthy relationships and friendships
- respect, kindness and appropriate behaviour towards others
- personal boundaries, privacy and consent
- recognising pressure, coercion, manipulation and controlling behaviour
- recognising when behaviour makes themselves or another person feel unsafe or uncomfortable





- safe and respectful behaviour online
- the importance of not sharing another person's private information or images without permission
- bullying, prejudice, discrimination and harmful language
- recognising and challenging behaviour that may harm, exclude or humiliate others
- how to report something that has happened to them or another child
- identifying trusted adults and understanding how and where to seek help.

Teaching will be adapted to pupils' ages, developmental stages, SEND, SEMH and communication needs. Storybrook will ensure that safeguarding education is accessible and meaningful, including through repetition, modelling, visual support, social stories and other appropriate approaches where required.

Teaching about online sexual behaviour and the sharing of imagery will be carefully matched to pupils' age, development and readiness. For primary-aged pupils, the school may teach the underlying protective principles, such as privacy, consent, appropriate image sharing, recognising pressure, keeping personal information safe and seeking help, **without unnecessarily introducing explicit terminology or content relating to nudes and semi-nudes**. This reflects current UKCIS guidance.

Pupils will be regularly reminded that they can speak to a trusted adult if something worries them, happens online or offline, or makes them feel unsafe or uncomfortable. Staff will respond in ways that encourage children to continue speaking up and will challenge language or attitudes that normalise abuse, harassment, discrimination or victim-blaming.

Prevention will extend beyond curriculum teaching. The school will use safeguarding and behaviour information, pupil voice, staff observations and emerging patterns of concern to identify where additional teaching, supervision, staff training or other preventative action may be required.

16. Multi-agency working

The school works closely with external agencies, including social care, MASH and the police, to ensure that pupils receive appropriate support. Effective multi-agency working ensures that concerns are addressed promptly and that pupils are safeguarded.

All referrals follow safeguarding procedures.

17. Involving parents/ carers

Storybrook recognises the importance of working in partnership with parents and carers. In most cases, parents or carers will be informed when a concern or incident of child-on-child abuse arises.

However, decisions about informing parents will always be led by safeguarding considerations. There may be circumstances where informing a parent or carer is not appropriate, for example where it may place a pupil at further risk or compromise a safeguarding investigation.

The DSL will make decisions regarding parental involvement on a case-by-case basis, taking





into account the needs, safety and best interests of the pupil. Where appropriate, parents and carers will be supported to understand the situation and work in partnership with the school to support their child.

18. Monitoring and review

The implementation of this policy is monitored by the Headteacher and DSL through regular review of safeguarding records, staff discussions and analysis of incidents. The policy is reviewed annually to ensure it remains effective and aligned with statutory guidance.

Monitoring includes review of safeguarding records, analysis of patterns, staff discussions and oversight by leadership to ensure consistent implementation.

19. Links to other policies

This policy should be read alongside policies below to ensure a consistent and comprehensive safeguarding approach.

- Safeguarding and Child Protection Policy
- Behaviour and Relationships Policy
- Prevent Duty Policy
- SMSC Policy
- Online Safety Policy
- AI Policy
- Filtering and Monitoring Policy
- Anti-Bullying Policy
- PSHE/ RSE Policy
- All relevant safeguarding procedures

20. Summary statement

At Storybrook, safeguarding is central to all practice. Through a consistent, proactive and relational approach, the school ensures that child-on-child abuse is prevented, identified and addressed effectively, and that all pupils are supported to feel safe, respected and able to thrive.

