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1. Introduction and vision statement

At Storybrook, we are committed to creating a culture where every child, member of staff, volunteer, visitor and stakeholder feels safe, respected, valued and protected from sexual harassment, sexual violence and harmful sexual behaviour.

We believe that everyone has the right to learn and work in an environment free from unwanted sexual behaviour, abuse, intimidation, discrimination and exploitation. Sexual harassment and sexual violence are never acceptable and will not be tolerated in any form, whether they occur in person, online, within school, during educational visits or in the wider community where they impact upon the safety and wellbeing of members of the school community.

As a specialist SEMH school, we recognise that some pupils may have experienced trauma, abuse, neglect, exploitation, disrupted attachments, exposure to inappropriate sexual content, adverse childhood experiences or difficulties understanding healthy relationships and personal boundaries. We understand that these experiences can influence behaviour, relationships and emotional regulation.

Whilst these factors may help us understand behaviour, they do not excuse behaviour that causes harm to others.

Storybrook understands that harassment, sexual violence and harmful sexual behaviour do not occur in isolation. When concerns arise, the school will consider the wider context in which they occur, including peer relationships, online activity, family circumstances, community influences and environmental factors. This contextual safeguarding approach supports effective assessment, intervention and risk reduction.

Our response is therefore both trauma-informed and safeguarding-led. We seek to understand the needs underlying behaviour whilst maintaining clear expectations, protecting those who may have been harmed and ensuring that all concerns are addressed appropriately, proportionately and consistently.

We recognise that sexual harassment, sexual violence and harmful sexual behaviour can occur:

- between children and young people
- from a child towards a member of staff
- from a member of staff towards a child
- between members of staff
- from visitors, contractors or other adults within the school community
- online through social media, gaming platforms, messaging services or other digital technologies

All concerns, allegations, disclosures and incidents will be taken seriously, recorded appropriately and managed in accordance with safeguarding procedures, statutory guidance and relevant legislation.





At Storyybrook, we are committed to fostering a culture of respect, consent, dignity, equality and healthy relationships. Through education, therapeutic support, strong safeguarding practice and positive role modelling, we aim to help pupils develop the knowledge, understanding and skills needed to form safe, respectful and healthy relationships throughout their lives.

Our approach is underpinned by the Storyybrook principles of:

Regulate → Relate → Protect → Repair → Restore

The safety, welfare and dignity of children will always remain our primary consideration.

2. Aims and principles

Aims

This policy aims to:

- provide a safe, respectful and inclusive environment for all pupils, staff, volunteers, governors, contractors and visitors
- prevent sexual harassment, sexual violence and harmful sexual behaviour through education, early intervention and a strong safeguarding culture
- ensure all members of the school community understand what constitutes unacceptable sexual behaviour and how concerns can be reported
- establish clear procedures for responding to concerns, allegations, disclosures and incidents
- ensure all reports are taken seriously and managed fairly, consistently and sensitively
- protect and support any child who has experienced or may have experienced harm whilst ensuring appropriate support and intervention for those displaying harmful behaviour
- promote healthy relationships, consent, respect, equality and personal safety through the curriculum and wider school culture
- fulfil the school's statutory safeguarding duties and responsibilities under relevant legislation and guidance
- support staff to recognise, prevent, respond to and record incidents appropriately
- ensure that patterns, trends and emerging risks are identified through effective monitoring and oversight

Principles

At Storyybrook, our approach is guided by the following principles:

Safeguarding first

The safety, welfare and best interests of children are paramount. All concerns relating to sexual harassment, sexual violence or harmful sexual behaviour will be considered through a safeguarding lens and managed in accordance with safeguarding procedures.

“It could happen here”





All staff will maintain an attitude of “it could happen here” in relation to sexual harassment, sexual violence and harmful sexual behaviour.

Storybrook recognises that the absence of reports does not mean that harmful sexual behaviour, sexual harassment or sexual violence is not occurring. Children may not always recognise behaviour as harmful, understand what has happened, know how to describe their experience or feel able to tell an adult.

Staff must therefore remain alert to signs and indicators of concern, including changes in behaviour, emotional presentation, relationships, regulation, engagement or attendance, as well as sexualised behaviour or language that may be inappropriate for a child's age or developmental stage.

Within Storybrook's specialist SEMH context, staff will recognise that some children may communicate distress, harm or experiences of abuse through their behaviour rather than through a direct verbal disclosure. SEND, SEMH or communication needs must never be a reason to lower professional curiosity or assume that concerning behaviour is solely attributable to a child's additional needs.

Any concern, however it comes to light, must be taken seriously and reported in accordance with the school's safeguarding procedures.

Zero tolerance of harmful behaviour

Sexual harassment, sexual violence and harmful sexual behaviour are never acceptable and will not be normalised, minimised or dismissed as an inevitable part of growing up or as a consequence of a child's SEND or SEMH needs. Behaviour that causes harm to others will always be recognised, challenged and addressed appropriately.

Zero tolerance does not mean that the school's response will automatically be punitive or exclusionary. Storybrook will respond to each concern according to its nature, seriousness, context and impact, taking account of the age, developmental stage, SEND, SEMH, communication needs and individual circumstances of the children involved.

Safeguarding, safety and accountability will remain central to the school's response. Alongside appropriate boundaries and consequences where required, children will be supported to understand the impact of their behaviour, develop safer and more appropriate ways of relating to others and reduce the risk of further harm.

A trauma-informed approach will help the school understand why behaviour may have occurred, but will never be used to excuse, minimise or normalise behaviour that has caused harm.

Trauma-informed practice

As a specialist SEMH school, we recognise that behaviour may be influenced by previous experiences, trauma, adversity, unmet needs or difficulties with emotional regulation and relationships. Whilst these factors may help us understand behaviour, they do not excuse behaviour that causes harm.





Child-centred response to harm

The wishes, feelings, safety and wellbeing of the child who has experienced or may have experienced harm will be central to decision-making. The child will be listened to, taken seriously, supported and protected throughout the school's safeguarding response and any external safeguarding process.

Fair and proportionate response

Concerns and allegations will be considered fairly, objectively and proportionately. Staff will not investigate safeguarding concerns themselves. The DSL will determine the appropriate safeguarding response and whether external agencies should be involved. Appropriate support and protective measures will be provided while concerns are considered and during any external safeguarding or investigative process.

Early intervention

Where concerns arise, the school will seek to intervene at the earliest opportunity to reduce risk, prevent escalation and promote positive outcomes for all involved.

Education and prevention

We believe prevention is more effective than reaction. Through Relationships Education, PSHE, online safety education, therapeutic support and positive role modelling, pupils will be taught how to build healthy, respectful and safe relationships.

Equality, respect and inclusion

All members of the school community have the right to be treated with dignity and respect. We are committed to promoting equality and challenging discrimination, prejudice, sexism, misogyny, sexualised language and harmful stereotypes.

Professional responsibility

Everyone has a responsibility to contribute to a safe culture. Staff are expected to model respectful behaviour, maintain professional boundaries and act immediately when concerns arise.

Restoration where appropriate

Alongside safeguarding and accountability, we seek to repair relationships and rebuild trust wherever it is safe, appropriate and in the best interests of those involved. Restorative approaches will never replace safeguarding action where this is required.

3. Legal framework

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

Legislation





- Children Act 1989
- Children Act 2004
- Education Act 2002
- Education and Inspections Act 2006
- Equality Act 2010
- Human Rights Act 1998
- Sexual Offences Act 2003
- Voyeurism (Offences) Act 2019
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Worker Protection (Amendment of Equality Act 2010) Act 2023

Statutory guidance and national safeguarding advice

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance, for introduction from 1 September 2026
- Behaviour in Schools: Advice for Headteachers and School Staff
- Searching, Screening and Confiscation: Advice for Schools
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- relevant Department for Education and UK Council for Internet Safety guidance relating to safeguarding, child-on-child abuse, online safety and harmful sexual behaviour.

Storybrook recognises sexual harassment, sexual violence and harmful sexual behaviour involving children as safeguarding matters. Concerns will be considered and responded to in accordance with Keeping Children Safe in Education 2026 and the school's Safeguarding and Child Protection Policy.

Where a concern involves a member of staff, supply staff member, volunteer, contractor or other adult working with children, the school will follow the allegations and low-level concerns procedures set out within Keeping Children Safe in Education 2026 and the school's Safeguarding and Child Protection Policy, including referral to or consultation with the Local Authority Designated Officer (LADO) where appropriate.

Independent School Standards

This policy supports Storybrook's compliance with the Education (Independent School Standards) Regulations 2014, including:

- Part 1 - Quality of education provided
- Part 2 - Spiritual, moral, social and cultural development of pupils
- Part 3 - Welfare, health and safety of pupils
- Part 4 - Suitability of staff, supply staff and proprietors
- Part 8 - Quality of leadership in and management of schools.





Equality and staff protection

Storybrook recognises its responsibilities under the Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023. The school will take reasonable steps to prevent sexual harassment in the workplace and will respond appropriately to concerns involving staff, pupils, visitors, contractors or other third parties.

Safeguarding remains paramount. Where a concern may involve harm to a child, the school's safeguarding procedures will take precedence and appropriate advice or referrals will be sought from children's social care, the police, the LADO or other relevant agencies where required.

Relationship with other policies

This policy should be read alongside the school's child protection and safeguarding, behaviour and relationships, staff conduct, online safety, anti-bullying, RSHE, equality, SEND and complaints policies. Where there is any conflict between this policy and safeguarding procedures, safeguarding requirements will take precedence.

4. Definitions

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

Sexual harassment

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

Sexual harassment can occur between children, between adults, from a child towards an adult, or from an adult towards a child.

Examples may include:

- sexual comments, remarks or jokes
- sexualised name-calling
- unwanted sexual attention
- discussing sexual activity inappropriately
- sexual gestures
- displaying, sharing or showing sexual images
- making comments about a person's body, appearance or clothing
- spreading sexual rumours
- sexualised teasing or banter
- pressuring someone into sexualised behaviour
- unwanted physical contact of a sexual nature
- online sexual harassment

Sexual harassment can be a single incident or a pattern of behaviour.





Sexual violence

Sexual violence refers to sexual offences and acts of a sexual nature carried out without consent.

Sexual violence includes:

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

Any allegation or disclosure of sexual violence will be treated as a safeguarding concern and managed in accordance with statutory safeguarding procedures.

Harmful sexual behaviour (HSB)

Harmful Sexual Behaviour (HSB) refers to sexual behaviours displayed by children or young people that are developmentally inappropriate, harmful to themselves or others, abusive, coercive or exploitative.

Examples may include:

- repeated sexualised language or behaviour
- inappropriate touching
- exposing private body parts
- coercive behaviour
- sharing sexual images
- persistent sexual boundary violations
- sexual aggression
- behaviour involving force, threats, manipulation or exploitation

The school recognises that sexual behaviours exist on a continuum from developmentally expected behaviours through to problematic and harmful behaviours. Professional judgement, safeguarding guidance and individual circumstances will be considered when assessing concerns.

Child-on-child sexual abuse

Child-on-child sexual abuse occurs when a child is subjected to sexual harassment, sexual violence or harmful sexual behaviour by another child.

This may occur:

- within school
- online
- during transport
- during educational visits
- in the wider community





Storyybrook recognises that child-on-child abuse can occur between pupils of any age, gender, ability or background.

Online sexual harassment

Online sexual harassment refers to unwanted sexual behaviour carried out through technology or digital platforms.

Examples include:

- sharing sexual messages
- sending unwanted sexual content
- sharing, requesting or possessing nude or semi-nude images
- sexualised comments through messaging platforms
- online sexual bullying
- sharing sexual rumours online
- coercion, exploitation or manipulation through digital communication

Online sexual harassment will be treated with the same seriousness as face-to-face incidents.

Consent

Consent means a person freely agrees to participate in an activity and has both the freedom and capacity to make that decision.

Consent cannot be assumed and may be withdrawn at any time.

For safeguarding purposes, children may not always have the developmental understanding, maturity or freedom from influence required to provide informed consent. Staff will therefore consider age, understanding, vulnerability, coercion and power imbalance when assessing concerns.

Terminology

The terminology used when responding to sexual harassment, sexual violence and harmful sexual behaviour will be considered carefully and sensitively. While terms such as “victim” and “child alleged to have caused harm” may be used within legislation, statutory guidance and professional processes, Storyybrook recognises that not all children will identify with these terms and that they should not define a child.

Where concerns involve children, Storyybrook will generally use language such as “the child who has experienced or may have 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.

While terms such as “victim” and “alleged perpetrator” may be used within legislation, statutory guidance and professional processes, Storyybrook recognises that not all children will identify with these terms and that they should not define a child.





When concerns involve adults, terminology will be selected according to the circumstances and the relevant safeguarding, employment, disciplinary or complaints process.

Safeguarding concern

Any incident, allegation, disclosure or suspicion involving sexual harassment, sexual violence or harmful sexual behaviour may constitute a safeguarding concern and will be referred to the Designated Safeguarding Lead (DSL) for consideration and appropriate action.

Professional boundaries

Professional boundaries are the clear expectations and standards that govern relationships between staff and pupils.

All staff are expected to maintain appropriate professional boundaries at all times, both in person and online, in accordance with the Staff Code of Conduct and Safeguarding and Child Protection Policy.

5. Sexual Harassment

Statement of principle

Storybrook is committed to maintaining a safe, respectful and inclusive environment where all members of the school community are treated with dignity and respect.

Sexual harassment is never acceptable and will not be tolerated. All incidents will be taken seriously, responded to promptly and managed in accordance with safeguarding procedures, relevant legislation and this policy.

Sexual harassment may occur between pupils, from a pupil towards a member of staff, between staff members, or involve visitors, contractors or other adults connected to the school.

Child-on-child sexual harassment

Storybrook recognises that sexual harassment can occur between children of any age, gender, ability or background.

Sexual harassment is not dismissed as:

- banter
- part of growing up
- harmless teasing
- attention-seeking behaviour
- a normal part of adolescence

All concerns will be considered within the context of safeguarding, child development, individual vulnerability and potential harm.





Sexual harassment towards staff

All staff have the right to work in an environment free from sexual harassment.

The school recognises that pupils with SEMH needs may sometimes display sexualised language or behaviours. Whilst staff will respond in a calm, professional and trauma-informed manner, sexual harassment towards staff will never be accepted, normalised or viewed as an inevitable part of working within a specialist setting.

Sexual harassment between staff

Storybrook expects all staff to maintain professional and respectful relationships.

Any allegation of sexual harassment involving staff will be taken seriously and investigated in accordance with the Staff Code of Conduct, disciplinary procedures, safeguarding procedures and relevant employment legislation.

Visitors, contractors and third parties

Sexual harassment involving visitors, contractors, volunteers or other third parties will be taken seriously and managed appropriately.

The school may take actions including:

- removal from the site
- restriction of access
- safeguarding referrals
- referral to external agencies
- reporting to the police where appropriate

6. Sexual violence

Statement of principle

Storybrook recognises that sexual violence is a serious safeguarding concern that can have a significant and lasting impact on the physical, emotional, psychological and social wellbeing of those affected.

All allegations, disclosures, reports or concerns relating to sexual violence will be taken seriously, managed sensitively and responded to promptly in accordance with safeguarding procedures, statutory guidance and relevant legislation.

The safety, welfare and wishes of the victim will remain central to all decision-making.

Child-on-child sexual violence

Storybrook recognises that sexual violence can occur between children of any age, gender, ability or background.

The school will never dismiss reports of sexual violence as:





- banter
- experimentation
- horseplay
- attention-seeking behaviour
- a normal part of growing up

All reports will be considered carefully, objectively and through a safeguarding lens.

Children who display harmful sexual behaviour may themselves be vulnerable, have experienced trauma or require safeguarding support. However, these factors do not excuse behaviour that causes harm.

Concerns or allegations involving adults working with children

Any concern or allegation that a member of staff, supply staff member, volunteer, contractor or other adult working with children has behaved in a way that may have harmed a child, may have committed a criminal offence against or related to a child, may pose a risk of harm to children, or may indicate that they are unsuitable to work with children will be managed through the school's procedures for managing allegations against adults and in accordance with Keeping Children Safe in Education 2026.

Concerns about adults working with children will not be managed through the child-on-child abuse or harmful sexual behaviour process.

Where the concern meets, or may meet, the harm threshold, the Headteacher or appropriate case manager will follow the school's allegations procedure and seek advice from or make a referral to the Local Authority Designated Officer (LADO) in accordance with local procedures.

Where a concern about an adult does not meet the harm threshold, it will be considered under the school's low-level concerns procedures. A concern should not be disregarded simply because it does not meet the harm threshold. Low-level concerns will be shared, recorded and reviewed in accordance with the Staff Code of Conduct and the school's safeguarding procedures.

Where the concern relates to the Headteacher, it must be reported directly to the appropriate person identified within the school's Safeguarding and Child Protection Policy and allegations procedures, without informing the Headteacher.

Where appropriate, the school will also consider whether children's social care, the police or another relevant agency should be informed.

7. Harmful sexual behaviour (HSB)

Statement of principle

Storybrook recognises that children and young people develop at different rates and that some sexual behaviours can form part of normal childhood development. However, some behaviours may be inappropriate, problematic or harmful and require intervention to safeguard the child and others.





The safety, welfare and dignity of all members of the school community remain paramount.

Continuum of sexual behaviour

Developmentally expected behaviour

Children may display behaviours that are typical for their age and stage of development.

Examples may include:

- age-appropriate curiosity
- asking questions about bodies and relationships
- using correct anatomical language
- seeking privacy when changing

Such behaviours would normally be addressed through education, guidance and supervision.

Assessment of harmful sexual behaviour

When concerns about sexual behaviour arise, the DSL will consider the behaviour developmentally and contextually. Sexual behaviour will not automatically be regarded as harmful or abusive solely because it has caused concern. Equally, behaviour will not be minimised because a child has SEND, SEMH needs, communication difficulties or a history of trauma.

Assessment will consider:

- the ages and developmental stages of the children involved
- the nature and type of behaviour
- whether the behaviour is developmentally expected, inappropriate, problematic or abusive
- the frequency, duration and persistence of the behaviour
- whether the behaviour is isolated, repeated or escalating
- the context in which the behaviour occurred
- the child's understanding of the behaviour and its impact
- any SEND, SEMH, cognitive, sensory or communication needs
- consent and each child's developmental capacity to understand and communicate agreement or refusal
- whether there was coercion, pressure, manipulation, intimidation, secrecy or threats
- any imbalance of power, including differences in age, development, ability, vulnerability, social status or influence
- whether force or aggression was involved
- the apparent intent or motivation behind the behaviour, while recognising that intent is not required for behaviour to cause harm
- the actual or potential impact on the child or children involved
- whether the behaviour involved online activity, imagery, technology or exposure to sexual content
- whether there are concerns about abuse, exploitation, grooming, trauma, neglect or other adverse experiences
- whether other children have been involved, affected or may be at risk





- any relevant previous safeguarding, behaviour or pastoral concerns.

The DSL will consider the overall pattern and context rather than relying upon any single factor. Where appropriate, recognised harmful sexual behaviour frameworks and specialist professional advice may be used to support assessment and decision-making.

SEND, SEMH needs, trauma or developmental differences may be highly relevant to understanding why behaviour has occurred and what intervention is required. They do not, however, excuse or minimise harm experienced by another child.

Similarly, developmentally expected sexual behaviour will not be unnecessarily labelled as harmful or abusive. Where behaviour is assessed as inappropriate, problematic or abusive, the school's response will be proportionate to the level of concern and will seek to safeguard all children involved, address the behaviour, provide appropriate support and reduce the risk of further harm.

Problematic sexual behaviour

Some behaviours may be inappropriate or concerning but not necessarily abusive.

Examples may include:

- repeated sexualised language
- inappropriate comments
- excessive interest in sexual topics
- poor understanding of personal boundaries
- exposure to inappropriate online content

These behaviours may indicate unmet needs, a lack of understanding or exposure to unsuitable experiences and may require targeted intervention and support.

Harmful sexual behaviour

Behaviours are more likely to be considered harmful where they involve:

- coercion, pressure or manipulation
- threats or intimidation
- secrecy
- significant age, size or power differences
- repeated behaviour despite intervention
- sexual aggression
- exploitation of another person
- distress, fear or harm to another person
- sexual activity that is not age or developmentally appropriate

Child-on-child sexual abuse

Storyybrook recognises that child-on-child sexual abuse can occur between children of any age, gender, ability or background.





This may include:

- sexual harassment
- sexual violence
- unwanted sexual touching
- coercive behaviour
- sexual bullying
- sharing sexual images
- online sexual abuse
- exploitation or manipulation

Child-on-child sexual abuse will never be dismissed as:

- banter
- horseplay
- experimentation
- attention-seeking behaviour
- part of growing up

All concerns will be treated seriously and managed through safeguarding procedures.

Online harmful sexual behaviour

HSB may also occur online.

Examples include:

- sharing sexual content
- requesting sexual images
- sending unwanted sexual messages
- online coercion or manipulation
- accessing or sharing inappropriate material
- sharing nude or semi-nude images

Online incidents will be managed with the same seriousness as incidents occurring face-to-face.

8. Child-on-child incidents

Statement of principle

Storybrook recognises that children can abuse other children and that child-on-child abuse may occur between pupils of any age, gender, ability, background or vulnerability profile.

Child-on-child abuse can include sexual harassment, sexual violence, harmful sexual behaviour, online abuse, coercive behaviour, sexual bullying and the sharing of sexual images.

The school will never dismiss child-on-child abuse as:





- banter
- horseplay
- experimentation
- attention-seeking behaviour
- part of growing up

All concerns will be considered through a safeguarding lens and responded to promptly, proportionately and appropriately.

Incidents will be managed in accordance with the procedures set out in Section 11: Reporting, responding and managing incidents, with appropriate support provided to all individuals involved.

9. Staff conduct expectations

Statement of principle

All staff play a vital role in creating and maintaining a culture of safety, respect and professionalism at Storybrook.

Staff are expected to model appropriate behaviour, maintain clear professional boundaries and contribute to an environment where sexual harassment, sexual violence and harmful sexual behaviour are not tolerated.

All adults working within the school have a responsibility to safeguard children, promote respectful relationships and take action when concerns arise.

Professional conduct

Staff must:

- treat all pupils, colleagues, parents, carers and visitors with dignity and respect
- model respectful language and behaviour at all times
- maintain appropriate professional boundaries
- challenge inappropriate, sexualised or discriminatory language and behaviour
- promote equality, inclusion and respect
- act as positive role models for healthy relationships and personal boundaries
- comply with safeguarding procedures and the Staff Code of Conduct

Professional boundaries

Staff must maintain clear and appropriate professional boundaries with pupils at all times.

Staff must not:

- engage in inappropriate personal relationships with pupils
- use sexualised language, jokes or comments
- discuss their own intimate or sexual relationships with pupils





- communicate with pupils through unauthorised personal accounts or social media platforms
- share personal images or information that could compromise professional boundaries
- engage in behaviour that could be interpreted as grooming or boundary violations

Staff should remain mindful that professional standards apply both within and outside school, including online.

Staff training

All staff will receive regular safeguarding training which includes:

- sexual harassment
- sexual violence
- harmful sexual behaviour
- child-on-child abuse
- professional boundaries
- online safety
- responding to disclosures
- current safeguarding risks and trends

Training will be updated regularly to reflect statutory guidance and emerging safeguarding concerns.

Staff wellbeing and support

Storybrook recognises that managing incidents involving sexual harassment, sexual violence and harmful sexual behaviour can be distressing for staff.

Appropriate support will be provided where required, including:

- supervision and debrief opportunities
- leadership support
- access to wellbeing support
- referrals to external support services where appropriate

Concerns about adults

Any concern about the conduct of an adult working with children must be reported and managed through the school's allegations or low-level concerns procedures, as appropriate. Such concerns must not be managed as child-on-child incidents. Where the harm threshold is met or may be met, the school's allegations procedure and LADO arrangements will apply.

10. Online sexual harassment and abuse

Statement of principle

Storybrook recognises that online sexual harassment and abuse can have a significant impact on the safety, wellbeing and mental health of children and adults.





Online incidents can occur both within and outside of school and may continue beyond the school day. Whilst technology provides valuable opportunities for learning and communication, it can also create opportunities for sexual harassment, exploitation, coercion and abuse.

The school adopts a proactive approach to online safety and will respond to all concerns promptly, proportionately and in accordance with safeguarding procedures.

Online sexual harassment and abuse will be treated with the same seriousness as incidents occurring face-to-face.

Understanding online sexual harassment and abuse

Online sexual harassment and abuse may occur through:

- social media platforms
- messaging applications
- gaming platforms
- online forums
- video-sharing platforms
- email or other digital communication methods

Behaviour may occur between pupils, from a pupil towards a member of staff, between adults, or involve individuals outside the school community.

Examples of online sexual harassment and abuse

Examples may include:

- sending unwanted sexual messages, comments or content
- making sexual comments or spreading sexual rumours online
- sexualised bullying, harassment or humiliation
- requesting or pressuring another person to provide sexual images or content
- sharing sexual images, videos or information without consent
- coercing, pressuring, manipulating or threatening another person into creating or sharing sexual content
- threatening to share or distribute nude, semi-nude or sexual imagery
- sextortion, blackmail or other threats involving sexual imagery or information
- online sexual exploitation or grooming
- creating, requesting, possessing, sharing or redistributing nude or semi-nude imagery involving children
- creating or sharing digitally manipulated sexual imagery
- creating or sharing AI-generated sexual imagery, including sexualised deepfakes or “deep nudes”
- creating, sharing or using synthetic sexual content to harm, humiliate, threaten, coerce or exploit another person
- using impersonation, fake accounts or manipulated identities for sexual harassment, grooming, exploitation or abuse
- using technology to intimidate, control, harass, threaten or humiliate another person.





Online sexual harm may involve genuine, altered or entirely synthetic content. The fact that an image, video or other material is AI-generated or digitally manipulated, rather than a genuine depiction of a person, does not prevent its creation, use or distribution from presenting a serious safeguarding concern.

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
- the ages and developmental stages of the children involved
- any SEND, SEMH or communication needs
- whether the imagery has been shared more widely or may be redistributed
- whether an adult may be involved
- whether other children may be at risk
- whether the incident forms part of a wider pattern of abuse, exploitation or harmful sexual behaviour
- whether advice, referral or involvement from children's social care, the police or another relevant agency is required. Where a concern involves an adult working with





children, the school's allegations and low-level concerns procedures will apply, including LADO arrangements where appropriate.

Parents and carers will normally be informed at an early stage unless doing so would place a child at additional risk of harm or otherwise compromise a safeguarding response.

All decisions and actions will be recorded appropriately.

AI-generated and manipulated sexual imagery

Where a concern involves AI-generated, digitally manipulated or synthetic sexual imagery involving or purporting to depict a child, staff must treat this as a safeguarding concern and report it immediately to the DSL. Staff must not create, reproduce, edit, forward, save or unnecessarily view the material.

The DSL will consider the circumstances and impact of the incident, whether coercion, threats, harassment, exploitation or wider distribution are involved, whether other children may be at risk and whether advice or referral to children's social care or the police is required.

Online behaviour expectations

Pupils are expected to:

- use technology safely and responsibly
- communicate respectfully
- report concerns or inappropriate content
- respect the privacy and dignity of others
- follow school expectations for online behaviour

Staff are expected to model safe and professional online conduct at all times and comply with the Staff Code of Conduct, Online Safety Policy and Acceptable Use Agreements.

11. Reporting, responding and managing incidents

Statement of principle

Storybrook is committed to ensuring that all concerns relating to sexual harassment, sexual violence, harmful sexual behaviour and child-on-child abuse are taken seriously and responded to promptly, fairly and consistently.

All incidents will be managed through a safeguarding-led, trauma-informed and child-centred approach. The safety and wellbeing of those affected will remain the school's primary consideration.

Reporting concerns

All members of the school community have a responsibility to report concerns.

Pupils are encouraged to speak to:





- any member of staff
- the Designated Safeguarding Lead (DSL)/ Headteacher
- a Deputy DSL
- a trusted adult

Staff must report concerns immediately if they:

- witness inappropriate behaviour
- receive a disclosure
- observe concerning behaviour
- become aware of online sexual harassment or abuse
- suspect that a child or adult may be at risk

No concern should be considered too small to report.

Staff must never assume that another person has reported a concern.

Responding to disclosures

Where a disclosure is made, staff should:

- remain calm and listen carefully
- take the disclosure seriously
- reassure the individual that they have done the right thing by speaking up
- avoid asking leading questions
- avoid making promises of confidentiality
- explain that information may need to be shared with appropriate safeguarding professionals
- record the disclosure accurately using the individual's own words wherever possible
- report the concern immediately to the DSL

Staff should not investigate concerns themselves. All concerns should be reported to the Designated Safeguarding Lead (DSL) or Deputy DSL as soon as possible and always on the same school day.

Staff must not investigate the concern, attempt to establish whether an allegation is true, confront the child alleged to have caused harm, interview other children or seek evidence themselves. The DSL will determine the appropriate next steps and whether advice or involvement from children's social care, the police or other agencies is required.

DSL assessment and decision-making

On receiving a report or concern, the DSL or DDSL will consider all available information and determine the appropriate safeguarding response. Decisions will be made on a case-by-case basis and will be informed by the child's best interests, safety and welfare.

The DSL will consider:

- the nature, seriousness and circumstances of the reported behaviour





- the wishes, feelings, safety and wellbeing of the child who has experienced or may have experienced harm
- the age and developmental stage of all children involved
- any SEND, SEMH, communication needs or other vulnerabilities
- the developmental understanding of the children involved
- whether there is any imbalance of power, including differences in age, development, ability, vulnerability, social influence or status
- whether coercion, pressure, manipulation, intimidation, threats or secrecy may have been involved
- whether the behaviour was isolated, repeated, persistent or escalating
- whether there is evidence of a wider pattern of harmful or concerning behaviour
- the actual or potential impact of the behaviour on the child or children involved
- whether the concern involves sexual violence, sexual harassment, harmful sexual behaviour, exploitation, grooming or another form of abuse
- whether there are online or digital elements, including messaging, social media, gaming, images, videos, manipulated or AI-generated content or other technology
- whether behaviour has occurred beyond the school premises or within the wider community but creates safeguarding implications within school
- whether other children have witnessed, experienced or participated in the behaviour or may otherwise be at risk
- any previous safeguarding, behaviour, attendance, pastoral or welfare information relevant to the children involved
- any relevant contextual safeguarding factors, including peer groups, locations, transport, community settings or online environments
- whether there is an immediate or ongoing risk of harm
- whether a risk assessment or safety plan is required
- whether advice, referral or involvement from children's social care, the police, the LADO or another relevant agency is required.

The DSL will consider information collectively rather than relying on any single factor. A child's SEND, SEMH needs, communication difficulties or experiences of trauma may be relevant to understanding the circumstances and determining appropriate support, but must not result in harmful behaviour being minimised or safeguarding indicators being overlooked.

The DSL will also consider whether information from an individual incident indicates a wider safeguarding concern. This may include risks involving other children, peer-group dynamics, particular locations or times, repeated or escalating behaviours, protected characteristics, online platforms or other contexts in which harm may be occurring.

The wishes and feelings of the child who has experienced or may have experienced harm will be sought and taken seriously. However, the DSL may need to take safeguarding action even where a child does not want information to be shared or a referral to be made. Where possible and appropriate, the reasons for this will be explained to the child in a way they can understand.

All decisions, including the rationale for action taken or not taken, will be recorded clearly on the school's safeguarding system.





Managing incidents

The school's response will be proportionate to the nature of the incident and level of risk identified.

Actions may include:

- safeguarding risk assessments
- increased supervision
- separation arrangements
- behaviour support measures
- therapeutic intervention
- restorative approaches where appropriate
- consultation with external agencies
- formal disciplinary procedures where applicable

The school will consider the needs of all individuals involved whilst ensuring that the safety of the child who has experienced or may have experienced harm remains paramount.

Communication with parents and carers

Parents and carers will normally be informed of concerns and incidents unless there is a safeguarding reason not to do so.

The DSL will determine:

- when parents should be informed
- what information can be shared
- whether external agency advice should be sought before communication takes place

The school will seek to maintain open, professional and supportive communication throughout the process.

Safeguarding and external referrals

Where appropriate, the school may seek advice from or make referrals to:

- Children's Social Care
- the Police
- Early Help Services
- Child and Adolescent Mental Health Services (CAMHS)
- specialist harmful sexual behaviour services
- safeguarding partnerships and other relevant agencies

Referrals will be made where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, or where a criminal offence may have occurred.





Risk assessment and safety planning

Following any report, disclosure or allegation of sexual harassment, sexual violence or harmful sexual behaviour, the DSL will consider whether an individual or wider risk assessment and safety plan is required to safeguard the children involved and others who may be affected.

Risk assessment and safety planning will consider, as appropriate:

- the immediate and ongoing safety of the child who has experienced or may have experienced harm
- any risk posed by or to the child alleged to have caused harm
- risks to other pupils or members of staff
- classroom arrangements and pupil groupings
- movement around the school
- breaktimes, lunchtimes and other less structured periods
- arrival, departure and transport arrangements
- access to toilets, changing areas and other less supervised spaces
- staffing and supervision requirements
- educational visits, activities and off-site provision
- opportunities for direct or indirect contact between the children involved
- online contact, messaging, social media, gaming or other digital interaction
- known triggers, vulnerabilities or contextual safeguarding factors
- whether other children may have witnessed, experienced or been affected by the behaviour
- any additional protective measures or support required.

Safety arrangements will seek to minimise unnecessary contact between the children involved where this is required to manage risk.

Safeguarding arrangements must not unfairly place the responsibility for managing risk on the child who has experienced or may have experienced harm. Wherever reasonably possible, that child should not be required to make disproportionate changes to their education, routines, activities or access to the school in order to remain safe.

Any decisions about changes to classes, groupings, movement, activities or other arrangements will be made according to the circumstances and safeguarding needs of the children involved. The wishes and feelings of the child who has experienced or may have experienced harm will be considered, alongside the need to protect their continued access to education and support.

Risk assessments and safety plans will be recorded, shared with relevant staff on a need-to-know basis and reviewed regularly. They will be updated where circumstances change, new information becomes available or the level of risk changes.

Confidentiality and information sharing

The school will respect confidentiality wherever possible. However, information will be shared where necessary to safeguard children, comply with legal obligations or enable appropriate agencies to fulfil their responsibilities.





Information sharing decisions will be made in accordance with safeguarding guidance, data protection legislation and the best interests of the child.

Storyybrook approach

Our response to incidents is guided by the principles:

Regulate → Relate → Protect → Repair → Restore

We seek to protect those who may have experienced harm, support accountability, reduce future risk and help children develop safe, respectful and healthy relationships whilst maintaining safeguarding as our highest priority.

12. Support for children and adults involved

Statement of principle

Storyybrook recognises that incidents involving sexual harassment, sexual violence, harmful sexual behaviour and child-on-child abuse can have a significant impact on the emotional wellbeing, mental health, relationships and sense of safety of those involved.

Support will be provided to all individuals affected by an incident, taking account of their needs, wishes, vulnerabilities and circumstances. Support will be tailored to the individual and reviewed regularly to ensure it remains appropriate and effective.

The provision of support does not replace safeguarding action, investigation processes or accountability measures where these are required.

Support for children who have experienced or may have experienced harm

The safety, wellbeing and wishes of the child who has experienced or may have experienced harm will remain central to decision-making.

Support may include:

- access to a trusted adult
- safety planning and risk management
- regular wellbeing check-ins
- pastoral support
- therapeutic interventions
- counselling
- emotional regulation support
- mentoring
- adjustments to routines, timetables or learning arrangements where appropriate
- support from external agencies and specialist services

Children who have experienced or may have experienced harm will be listened to, treated with dignity and respect, and supported throughout any safeguarding or external investigative process.





Support arrangements will be reviewed regularly to ensure they continue to meet the individual's needs.

Support for children alleged to have caused harm

Storybrook recognises that children displaying harmful sexual behaviour or involved in incidents may themselves have experienced trauma, abuse, neglect, exploitation or other vulnerabilities.

Appropriate support will therefore be considered alongside safeguarding measures and accountability.

Support may include:

- safeguarding assessment
- behaviour support planning
- therapeutic intervention
- counselling
- mentoring
- emotional regulation support
- education around healthy relationships, consent and personal boundaries
- targeted social and emotional learning
- external specialist support services
- reintegration planning where appropriate

Support provided to any child alleged to have caused harm will not diminish the seriousness of the concern or reduce the school's responsibility to safeguard others.

Support for staff

The school recognises that managing incidents involving sexual harassment, sexual violence and harmful sexual behaviour can be challenging and emotionally demanding for staff.

Where appropriate, support may include:

- leadership guidance and support
- professional debrief opportunities
- safeguarding supervision
- wellbeing support
- access to employee assistance services where available
- additional training or professional development
- opportunities for reflective practice

The school is committed to ensuring that staff feel supported, valued and able to fulfil their safeguarding responsibilities effectively.





Ongoing review

Support arrangements for all individuals involved will be reviewed regularly by the Designated Safeguarding Lead (DSL) and relevant leaders.

Reviews will consider:

- wellbeing and emotional safety
- effectiveness of support provided
- emerging safeguarding concerns
- progress towards agreed outcomes
- any changes required to support plans or risk assessments

The school will continue to provide support for as long as it is considered necessary and appropriate.

Storybrook approach

Our approach is guided by the principles:

Regulate → Relate → Protect → Repair → Restore

We seek to protect those who may have experienced harm, support accountability and learning, and promote recovery, resilience and positive relationships for all members of the Storybrook community.

13. Recording, monitoring and governance

Statement of principle

Accurate recording, effective monitoring and robust governance oversight are essential to ensuring that sexual harassment, sexual violence, harmful sexual behaviour and child-on-child abuse are identified, managed and prevented effectively.

Storybrook is committed to maintaining clear records, identifying emerging risks and using information gathered to strengthen safeguarding practice, staff training and school improvement.

Recording requirements

All concerns, disclosures, allegations, incidents, decisions and actions relating to sexual harassment, sexual violence, harmful sexual behaviour and child-on-child abuse will be recorded promptly, accurately and securely.

Records will be maintained using the school's safeguarding recording systems, including:

- CPOMS
- TrackAble (where appropriate)
- safeguarding chronologies





- individual safeguarding files

Records should:

- be factual, objective and professional
- clearly distinguish between fact, opinion and professional judgement
- use the individual's own words wherever possible
- include dates, times and locations
- identify actions taken and by whom
- record outcomes and next steps

All safeguarding records will be stored securely and managed in accordance with the school's Data Protection Policy, Records Retention Schedule and relevant legislation.

Monitoring

The Designated Safeguarding Lead (DSL) will regularly review safeguarding information to identify:

- recurring themes
- patterns of behaviour
- locations where incidents occur
- repeat concerns involving individuals
- vulnerable pupils or groups
- online safety concerns
- emerging safeguarding risks
- effectiveness of interventions and support strategies

Monitoring will help ensure that concerns are identified early and responded to appropriately.

Analysis and review

Leaders will analyse safeguarding information to:

- identify trends over time
- evaluate the effectiveness of preventative strategies
- review curriculum provision
- identify training needs
- strengthen risk management arrangements
- inform school improvement planning

Information gathered through monitoring may contribute to reviews of:

- Relationships, Sex and Health Education (RSHE)
- PSHE provision
- online safety education
- behaviour and relationships provision
- therapeutic interventions





- safeguarding procedures

Governance oversight

The Proprietor, Governors and Safeguarding Governor have a responsibility to provide appropriate oversight and challenge in relation to safeguarding arrangements.

Governance oversight may include:

- review of anonymised safeguarding information
- safeguarding governor visits
- monitoring of safeguarding practice
- scrutiny of policies and procedures
- challenge and support to leaders
- review of safeguarding trends and actions taken

Individual pupils and confidential information will not be identified within governance reports unless required as part of formal safeguarding procedures.

DSL reporting

The DSL will provide regular safeguarding reports to the Proprietor and Governing Body.

Reports may include:

- numbers and types of incidents
- emerging themes and patterns
- vulnerable groups and identified risks
- actions taken
- training delivered
- outcomes of monitoring activities
- recommendations for further action

Reports will be anonymised and presented in a manner that protects confidentiality whilst enabling effective governance oversight.

Annual review

The school will review incidents, trends and safeguarding arrangements annually to evaluate effectiveness and identify areas for further development.

This review will consider:

- incident data
- safeguarding records
- pupil voice
- staff feedback
- training needs





- curriculum effectiveness
- emerging local and national safeguarding issues

Findings will inform future planning, policy development and safeguarding priorities.

Policy review

This policy will be reviewed annually, or sooner if:

- statutory guidance changes
- legislation changes
- significant safeguarding incidents occur
- local safeguarding priorities change
- monitoring identifies a need for review

Leaders and governors will ensure that the policy remains effective, compliant and responsive to the needs of the Storyybrook community.

Storyybrook commitment

Through accurate recording, rigorous monitoring and effective governance oversight, Storyybrook seeks to create a culture of continuous improvement where safeguarding remains everyone's responsibility and where children and adults feel safe, respected and protected from harm.

14. Prevention and education

Storyybrook believes that prevention is the most effective way to reduce the risk of sexual harassment, sexual violence and harmful sexual behaviour. We promote a culture in which children, staff and families feel confident to report concerns, seek support and challenge inappropriate behaviour without fear of embarrassment, retaliation or dismissal.

Curriculum

Through HeartSmart, RSHE, PSHE and Online Safety education, pupils are taught:

- healthy relationships
- consent and personal boundaries
- respect and equality
- online safety
- recognising inappropriate behaviour
- how to seek help and report concerns

Age and developmentally appropriate provision

Prevention and education will be age appropriate, developmentally appropriate and adapted to the individual needs of pupils. Storyybrook recognises that pupils may have SEND, SEMH needs, communication difficulties, differences in social understanding or previous experiences





that affect how they understand, retain and apply learning about relationships, boundaries, consent and personal safety.

Teaching will therefore be adapted as appropriate and may include:

- clear and concrete language
- repetition and regular revisiting of key concepts
- adult modelling and guided practice
- visual supports and prompts
- social stories and appropriate scenarios
- role play and rehearsal
- explicit teaching of boundaries, privacy and safe and unsafe behaviour
- opportunities to practise how to seek help, say no, communicate discomfort and report concerns
- individual or small-group teaching where this is more appropriate to a pupil's needs.

Staff will take care not to assume that a pupil understands a concept because it has previously been taught. Understanding will be checked and important safeguarding messages will be revisited where necessary.

Teaching will remain sensitive to pupils' developmental stages and experiences. Where pupils have experienced trauma, abuse, exploitation or exposure to inappropriate sexual content, teaching will be planned carefully to avoid unnecessary distress while ensuring that pupils receive the knowledge and skills they need to recognise unsafe behaviour and seek help.

For primary-aged pupils, protective safeguarding concepts will be taught in a developmentally appropriate way without unnecessarily introducing explicit sexual language, imagery or content that is not appropriate to their age or individual stage of development.

Therapeutic support

Additional support may include:

- ELSA
- Counselling
- Mentoring
- emotional literacy interventions
- therapeutic and pastoral support

School culture

We promote a culture where:

- trusted adults are available
- concerns can be reported safely
- respectful language is expected
- positive relationships are modelled
- all members of the community feel valued and heard





Staff training

Staff training supports the school's preventative approach by ensuring that staff can recognise, challenge and respond appropriately to sexual harassment, sexual violence and harmful sexual behaviour. Training arrangements are set out in Section 9 of this policy.

15. Roles and responsibilities

Proprietor and governors

The Proprietor and Governors are responsible for ensuring that appropriate safeguarding arrangements are in place, monitoring the effectiveness of this policy and providing appropriate challenge and oversight.

Headteacher

The Headteacher is responsible for promoting a culture of safety, respect and safeguarding, ensuring concerns are managed appropriately and supporting staff in implementing this policy.

Designated Safeguarding Lead (DSL)

The DSL is responsible for receiving and managing concerns, making safeguarding referrals, maintaining records, monitoring patterns and trends, and providing safeguarding advice and support to staff.

Staff

All staff are responsible for maintaining professional boundaries, modelling respectful behaviour, reporting concerns promptly and following safeguarding procedures.

Pupils

Pupils are expected to treat others with dignity and respect, follow school expectations and report concerns to a trusted adult.

Parents and Carers

Parents and carers are encouraged to work in partnership with the school, reinforce messages around healthy relationships and online safety, and report concerns promptly.

16. Related Policies

This policy should be read alongside:

- Safeguarding and Child Protection Policy
- Behaviour and Relationships Policy
- Staff Code of Conduct
- Online Safety Policy
- Filtering and Monitoring Policy
- Anti-Bullying Policy





- RSHE Policy
- Whistleblowing Policy
- Complaints Policy
- Equality Information and Objectives
- SEND Policy
- Attendance Policy

Where there is any conflict between this policy and safeguarding procedures, safeguarding requirements will take precedence.

