

# Protocol for Managing Peer on Peer Harmful Sexual Behaviour in Schools, Settings and Colleges

September 2021



This protocol for East Sussex Schools, settings and colleges has been produced jointly by the SLES Safeguarding team, SWIFT specialist services, SPOA, MASH and Early Help.

After reading through this document and looking at the flow chart, if you have any queries, or require further advice about the processes you should be following, please email SLES safeguarding at [SLES.Safeguarding@eastsussex.gov.uk](mailto:SLES.Safeguarding@eastsussex.gov.uk) or 01323 464949.



# CONTENTS

1. <a href="#">Introduction</a>	3
2. <a href="#">The Process for Initial Responses to Concerns</a>	3
3. <a href="#">Role of the DSL</a>	4
4. <a href="#">Cases referred to Children’s Services (SPOA)</a>	5
5. <a href="#">Immediate considerations for the school in managing the situation</a>	5
6. <a href="#">Multi-agency Risk Management Meeting</a>	7
7. <a href="#">Support for children involved</a>	8
8. <a href="#">Contact with parents</a>	9
9. <a href="#">Data Protection</a>	9
10. <a href="#">Communications</a>	10
Appendix 1: Flowchart for managing harmful sexual behaviour	13
Appendix 2: Guidance for formulating a school-based safeguarding risk reduction plan	14
Appendix 3: Safeguarding Risk Reduction Plan (SRRP) template	20
Appendix 4: Information for parents on what happens following an incident of harmful sexual behaviour at school	27
Appendix 5: Scripts for headteachers and designated safeguarding leads to use when communicating with parents	30
Appendix 6: Key communications - challenges/consideration	35

## 1. Introduction

- 1.1 This document provides detailed local guidance on how schools should respond to incidents of sexual harassment, sexual violence or harmful sexual behaviour, as defined by the Department for Education's (DfE) Keeping Children Safe in Education. Statutory guidance for schools and colleges 2021. This is detailed in Part 5: Child on child sexual violence and sexual harassment and as well as the Department for Education's "Sexual violence and sexual harassment between children in schools and colleges: Advice for governing bodies, proprietors, head-teachers, principals, senior leadership teams and designated safeguarding leads" (September 2021).
- 1.2 For the purpose of this document, sexual harassment, sexual violence and harmful sexual behaviour will all be referred to as "harmful sexual behaviour". 'Harmful sexual behaviours' are defined as: "Sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child, young person or adult." (derived from Hackett, S (2014). Children and young people with harmful sexual behaviours. London: Research in Practice.).
- 1.3 The reasons why children and young people display harmful sexual behaviour are varied. Many children who display harmful sexual behaviour have been sexually abused or exposed to developmentally inappropriate sexual imagery, such as pornography. They may be 'acting out' such experiences as a way of communicating what has happened to them. However, such behaviour can also be an indirect response to other factors in a child's life, including other forms of trauma, such as witnessing domestic abuse, prior experience of physical and emotional abuse and neglect. Children and young people who display harmful sexual behaviour are likely to have low self-esteem, poor social skills and difficulties with anger, depression and peer relationships. Other pathways to harmful sexual behaviour may include lack of understanding and the child's cognitive functioning.
- 1.4 For the purposes of this document all educational establishments will be referred to as schools.
- 1.5 For the purposes of this document all children and young people will be referred to as children.

## 2. The Process for Initial Responses to Concerns:

- 2.1 Member of staff who sees/hears/or is informed (by either a parent or student) of the sexual behaviour should:
  - Stop the behaviour
  - Report the behaviour to the Designated Safeguarding Lead (DSL)
  - Make a record of what happened, include the following where known:
    - Describe the behaviour. What did the child say/do?
    - Context of the behaviour. Was it spontaneous or planned? Was there any force/aggression?
    - When and where did it happen?
    - Relationship between the children – are they the same age? Any power differences? Are there any significant SEND issues?
    - Response of the child who initiated the behaviour?
    - What was the response of the child who was targeted?

### 3. Role of the DSL

- 3.1 Using the [Brook Traffic Light Tool](#)<sup>1</sup> assess whether the reported/alleged behaviour is healthy, problematic or harmful. If the behaviour is considered to be problematic or harmful then an immediate referral must be submitted to the Single Point of Advice (SPOA). Do not interview any of the children involved until guidance has been provided from SPOA about whether this is appropriate.
- 3.2 Ensure that the child who has reported the behaviour is reassured that their concerns are being taken seriously and that they will be kept safe. Their wishes in terms of how they want to proceed should be sought and they should be given as much control as is reasonably possible based on the child's individual needs over decisions regarding how any assessments will be progressed and any support that they will be offered;
- 3.3 In cases where the sexual behaviour is considered to be healthy or low level problematic, the DSL should speak with the children involved to obtain a narrative of what has happened and to identify any potential concerns. These discussions will assist to identify the following:

#### **Child who is alleged to have displayed the behaviour:**

- Their account of what happened and why?
- How much responsibility they take for what has happened?
- Whether the child is at risk from another person?
- How do they feel about the child who made the allegation? Is there evidence of ongoing risk towards that child?

#### **Child who is alleged to have been targeted by the behaviour:**

- The impact of the behaviour on him/her?
- How the other child managed to get them into position to carry out the sexual behaviour?
- How do they feel about the other child?
- What support do they need?

- 3.4 The DSL should then re-assess the level of concern using either the Brook Traffic Light Tool or an alternative resource such as the NSPCC Protecting children from harmful sexual behaviour<sup>2</sup> to establish if the sexual behaviour was healthy, problematic or harmful. If the behaviour is considered to be problematic or harmful, the DSL should contact SPOA for advice.
- 3.5 In cases where the reported behaviour is assessed to be healthy, the school should make the parents of all the children involved aware of what has happened where possible on the day the behaviour came to light. In cases where the behaviour is assessed by the DSL to be problematic or harmful, contact should be made with SPOA to determine as to whether the parents can be informed of the concerns. SPOA will then provide a view on whether the parents can be informed and when they should be told. Examples of factors which need to be considered include:
  - Previous sexual abuse
  - Risk of physical harm
  - Not open to CSC

---

<sup>1</sup> There is now a cost of £30 and a training requirement to access the Brook Traffic Light Tool [Sexual Behaviours Traffic Light Tool – Brook](#)

<sup>2</sup> An alternative free resource is the NSPCC [Protecting children from harmful sexual behaviour | NSPCC Learning](#)

- If it would not jeopardise the safety of children

#### **4. Cases referred to Children's Services**

- 4.1 All referrals will be screened by SPOA unless made directly by the police, as those cases are referred directly to the Multi-Agency Safeguarding Hub (MASH).
- 4.2 If the referral is made by police it will be directly routed to the relevant MASH team and screened by a MASH Social Worker.
- 4.3 In lots of cases there will be no need for any involvement from a Social Worker following the initial referral. The SPOA or MASH worker may be able to help identify appropriate support for children, which may include protective behaviours' work to help them identify safe and unsafe touches and who they could talk to if they have any worries. This work could be offered by Early Help Services or the school. These referrals would not need to progress to social work involvement.
- 4.4 When a referral goes through to the MASH teams, a Social Worker may need to make contact with the parents of each referred child to discuss the individual needs of each child and assess what support could be offered. The MASH Social Worker will consider whether the case can be referred to another agency for assessment or intervention work or if the case requires Children's Services' oversight due to the identified risks. Decisions will be guided by the Continuum of Need indicators and overseen by a social work practice manager.
- 4.5 Where a referral is screened in MASH and where there are concerns that significant harm has occurred or where there is reason to believe a child/ or children are at risk of significant harm the threshold for a child protection strategy meeting will be met. Decisions to convene a strategy meeting will be jointly agreed by Social Care and Police and will follow statutory safeguarding procedures – [Pan Sussex Child Protection and Safeguarding Procedures](#).
- 4.6 Where concerns about harmful sexual behaviour in school, settings and colleges meet a threshold for a strategy meeting the SLES safeguarding Team should be notified and invited to attend. Professionals in attendance at the strategy meeting should contribute to risk management planning. They should agree what information is appropriate to share with parents and who will take responsibility for this, setting clear timescales for actions to be completed.

#### **5. Immediate considerations for the school in managing the situation**

##### **5.1 School-focused Risk management plan:**

- 5.2 When it comes to light that an incident of peer on peer harmful sexual behaviour involving children may have occurred on or off the school site, it is imperative that the school takes immediate action to safeguard all of the children involved. Initially it will not be apparent what level of risk the child alleged to have displayed the behaviour may pose towards the other child but also in terms of further harmful sexual behaviour more generally.
- 5.3 Prior to a multi-agency risk management plan meeting taking place, the school is required to put immediate measures in place which will reduce the likelihood of the children involved coming into contact and ensuring that action is taken to reduce the risks of further harmful sexual behaviour occurring.

The school will therefore need to create an **immediate** safeguarding risk management plan (SRRP – see appendix 5) which can then be reviewed at the multi-agency professionals meeting. The plan should consider arrangements for how the children’s classes will be arranged, additional supervision in class and during unstructured times of the school day; toilet arrangements; transport to/from school; off-site activities and the risk posed to the child within and outside the school community.

*Schools must factor in the following guidance when formulating these arrangements:*

*“Once the designated safeguarding lead (or a deputy) has decided what the next steps will be in terms of progressing the report, they should **carefully consider** again the question of the victim and alleged perpetrator(s) sharing classes and sharing space at school or college. This will inevitably involve complex and difficult professional decisions, including considering their duty to safeguard children and their duty to educate them”.*

*“Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes they share with the victim. The school or college should consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school or college premises (including before and after school-based activities) and on transport to and from school or college where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s)”.*

Keeping Children Safe in Education 2021

There may be particular issues for small schools to consider in these circumstances- there may not be a parallel class for the alleged instigator to move into, or space for the child to easily be separated from the alleged victim. However, small schools should endeavour to respond proportionately and as flexibly as possible in order to secure these immediate arrangements, and seek support from both SLES and ESBAS services (see para5.5) in so doing.

- 5.4 The SLES safeguarding team ([SLES.safeguarding@eastsussex.gov.uk](mailto:SLES.safeguarding@eastsussex.gov.uk)) should be notified immediately in such instances and they will lead the LA support for the school leadership team as a “rapid response team” as required. This could include (for example) support in drawing up the immediate temporary safeguarding risk reduction plan, support for the school in working with other professionals, reviewing supervision arrangements etc.

The school, with SLES support, should arrange a multi-agency professionals’ meeting so that relevant agencies can share information/assessments; discuss concerns and levels of risk and agree a risk management plan (using the “School-based Safeguarding Risk Reduction Plan” (SRRP)).

This meeting should take place within 15 working days of the incident(s) of peer on peer harmful sexual behaviour being alleged. A shared view on risk and safety requirements for all children will be reached which can be communicated with relevant parties. At the meeting a summary version of the accounts taken, and any evaluations of these, should be available for all parties on a need to know basis so that the school’s safety planning can be reviewed and amended as required. If Social Workers and/or Police need to be involved they will take accounts from all children involved before the meeting takes place. In most cases social workers and/or police will make arrangements to see children within 10 working days of a decision that Level 4 intervention is necessary.

Consideration will also need to be given at this meeting to the information that can be shared with the parents of the children involved.

Likely Multi-agency attendees; SLES, ESBAS, SWIFT, CSC, LA information governance team, comms, Police, probation service, These agencies will attend depending on the individual circumstances of the case.

- 5.5 The Education Support Behaviour and Attendance Service (ESBAS) are available (01273 481967, [ESBAS@eastsussex.gov.uk](mailto:ESBAS@eastsussex.gov.uk)) to advise on appropriate protective and educational consequences and how to manage staffing and physical resources flexibly in order to meet the outcomes of the SRRP. It is important for all children to be in full time education and the SRRP seeks to ensure both the alleged victim and perpetrator are able to access their educational entitlement safely and free from harm. Whilst the vast majority of previous incidents of HSB have been well managed by schools from their existing resources, in rare circumstances, the community impact of an allegation of Harmful Sexual Behaviour is such that it would be safer for the alleged perpetrator to be educated off-site for a period of time. ESBAS can advise on how Governors can make these arrangements with the parent/carers.

**Please see appendix 2 – Guidance for formulating a risk management plan for a pupil who may pose a risk of sexual harm to others.** The SLES safeguarding team can provide support and advice to the school with the creation of the safeguarding risk reduction plan.

## **6. Multi-agency Risk Management Meeting**

- 6.1 Any professionals from agencies working with the children involved (e.g. Social Worker; Youth Worker) should be invited to the meeting.
- 6.2 Initial position, which will be kept under review but shared with all relevant professionals. 'Effective sharing of information between practitioners and local organisations and agencies is essential for early identification of need, assessment and service provision to keep children safe'. P.18. Para.23 Working Together to safeguard children. 2018.
- 6.3 One aim of the multi-agency risk management plan meeting is to consider the evidence of the risks the child may pose (including the nature of the risks and to whom); review the existing SRRP to ensure any potential contact between the child alleged to have displayed the behaviour and the child who was targeted is managed carefully; to consider measures which may need to be put in place to manage any potential risks posed by the child alleged to have displayed peer on peer harmful sexual behaviour; to consider the risks to the child both within and outside of the school community and to consider what support the child may need him/herself to stop the behaviour and to return to a healthy trajectory. Professionals formulating the plan should refer to appendix 2 – "Guidance for formulating a risk management plan for a pupil who may pose a risk of sexual harm to others" when assessing the risks and developing a SRRP.
- 6.4 In formulating a SRRP, the needs and wishes of the victim should be considered to ensure that child is able to continue with his or her normal routine.
- 6.5 As part of the multi-agency risk management meeting, consideration should also be given to how the emotional needs and well-being of the child alleged to have displayed harmful sexual behaviour will be supported.

## 7. Support for children involved:

- 7.1 It is recognised in “Keeping children safe in education: statutory guidance for schools and colleges (September 2021)” that “It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child’s own behaviour might indicate that something is wrong. The school’s or college’s initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.”

Staff need to keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation; Staff should listen carefully to the child, reflecting back, using the child’s language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm

For those cases where there is Children’s Services’ involvement due to the alleged incident(s) of harmful sexual behaviour, if assessed as appropriate by a Social Worker, a child who has experienced harmful sexual behaviour could be referred to a specialist service which offers support to victims of sexual abuse. In addition, children and/or young people who have displayed harmful sexual behaviour could also be referred to a specialist service which provides assessment and intervention.

A victim of harmful sexual behaviour may feel unsafe and may struggle in a normal classroom environment due to their experiences. While schools and colleges should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, schools and colleges should provide a physical space for victims to withdraw. It may be necessary for schools and colleges to maintain arrangements to protect and support the victim for a long time. Schools and colleges should be prepared for this and should work with children’s social care and other agencies as required.

Whilst they should be given all the necessary support to remain in their school or college, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers). It is important that if the victim does



move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

The school should offer ongoing support to all the children who have been involved including the child alleged to have displayed harmful sexual behaviour. This could include identified members of staff “checking-in” with the children affected to help identify any worries or concerns. This will serve to help all of the children involved to feel safer within the school environment. Keeping Children Safe in Education 2021 (Part 5) acknowledges that in these instances schools will have a “difficult balancing act” in managing the needs of all children and young people involved.

- 7.2 Considerations of support as well as sanctions should be assessed and planned for on a case-by-case basis. No one solution or approach will be appropriate in all cases and any criminal proceedings, as well as the school’s own disciplinary policy, will be important factors in the decision making. At all times the school should ensure that effective safeguarding principles are followed, and professional advice should be sought where specialist assessments are required.
- 7.3 Harmful sexual behaviours in children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice should be taken, as appropriate, from children’s social care, specialist sexual violence services and the police.

## **8. Contact with parents**

- 8.1 Throughout the process the school should maintain open communication with the parents of all the children who have been involved (both children who have been targeted, and those who displayed the behaviour) to ensure any concerns are identified as quickly as possible.
- 8.2 See appendix 5 as to how to communicate with parents.

## **9. Data Protection**

- 9.1 It is important that schools consider data protection when managing an incident of peer on peer sexual behaviour in schools. It is likely that following an incident, there will be requests for information from parents of the children involved. Staff may also be asked information by parents of children not directly involved in the incident but concerned about how it may affect their child. It is recommended that in these situations, the school seeks advice from their Data Protection Officer (DPO) about what can and can’t be disclosed.
- 9.2 Records management
- 9.3 Having good records management processes are important at all times for schools, however, this is especially the case when it comes to safeguarding records. Accurate and up to date recording of child protection or welfare concerns is essential for a number of reasons:
- It can help the school identify child protection or welfare concerns at an early stage
  - It can help identify patterns of concern

- It can enable schools to record seemingly minor issues to build a more complete picture of what life may be like for their pupils
- It helps schools monitor and manage safeguarding practices, including decision making, actions taken and agreed joint strategies with other agencies
- It can provide evidence to support professional challenge, both within educational settings and when working with external agencies
- It can support schools to demonstrate action taken to reduce impact of harm to a child
- It helps to evidence robust and effective safeguarding practice in inspections and audits.

9.4 The importance of good, clear child protection record keeping is identified as essential practice within statutory guidance for educational settings. Keeping children safe in education 2021, (p.19) states that **All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child and that records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

9.5 More guidance around Data Protection can be purchase as a traded service through Services2Schools: <https://www.services2schools.co.uk/services/listservices/38>

## 10. Communications

10.1 Throughout the process the school should be aware of the potential need to communicate with a wider audience either within the school community or externally. This may be important for parental confidence, and also the school's reputation. Sensitive situations present real communication challenges but these must be anticipated and addressed.

10.2 Schools should be mindful of the need to prevent gossip, speculation and misinformation amongst the parent body and local community, and recognise the need to provide clear and robust reassurance for parents – even if detailed information cannot be shared.

10.3 Schools should be aware of the risk of social media and news media coverage of any situation and should take steps to ensure these are effectively managed.

10.4 Schools can and should seek adhoc advice and support from the ESCC Communications Team. For longer term support and assistance with training and communications skills, schools should consider subscribing to the S2S Communications support packages which includes training.

Further detailed communications advice is included in appendix 6.

## 11. Future planning and longer-term considerations

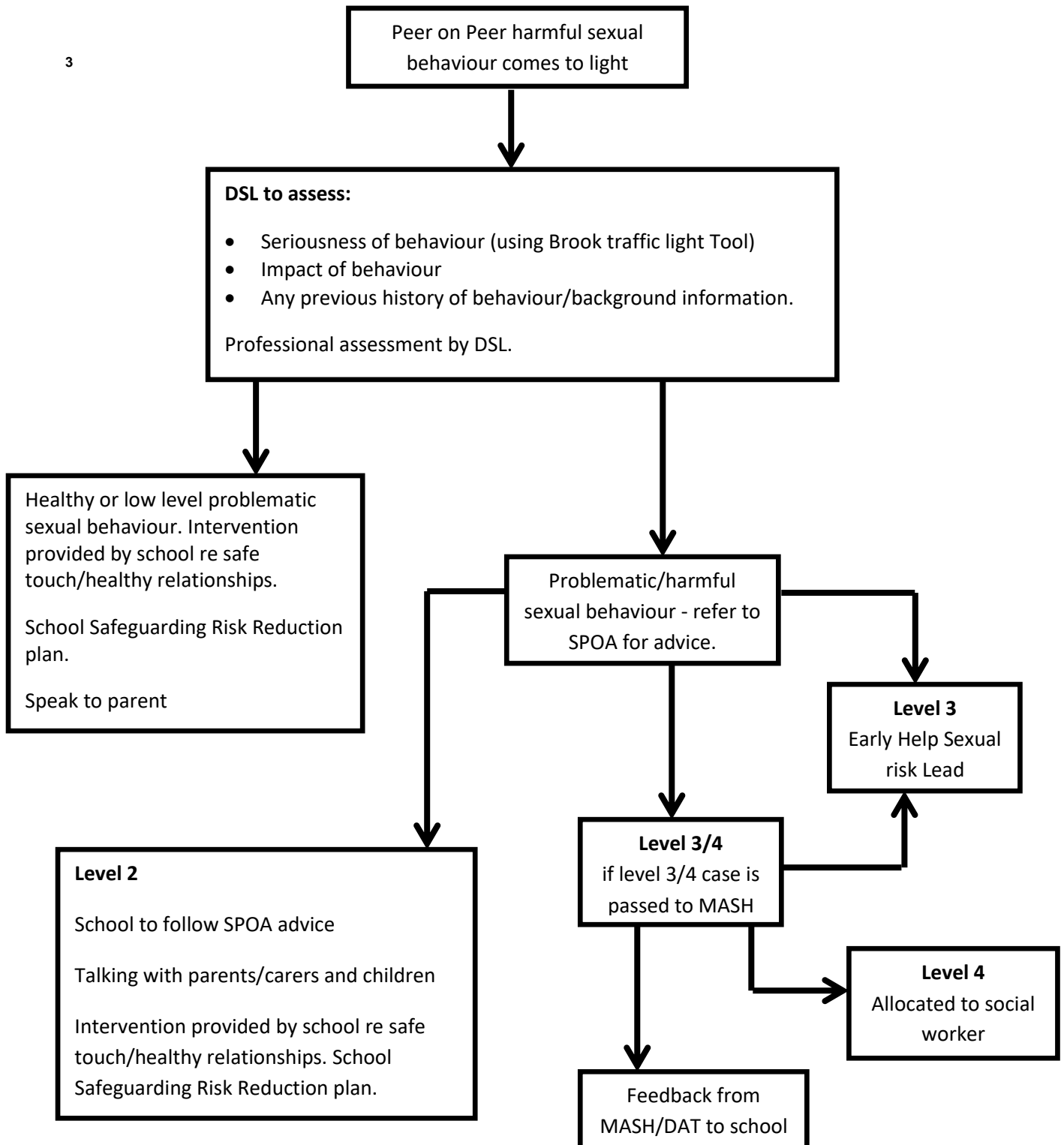
- 11.1 Due to the changes in a child's development, level of understanding and circumstances it is vital to review the SRRP on a regular basis to ensure that the plan is proportionate to the level of risk identified.
- 11.2 **Transition:** When concerns have been raised about a child or young person displaying harmful sexual behaviour, either currently or previously, the DSL of the current school/setting must where possible, at least 3 months prior to transition to a new school/setting review the child's records and current behaviours to assess if there is any evidence to suggest the following:
- Ongoing risk of harmful sexual behaviour occurring.
  - Ongoing risk to any children previously targeted by the child/young person's harmful sexual behaviour.
  - Compliance with rules/restrictions (e.g. current or previous SRRP; any legal restrictions, such as bail conditions or Sexual Harm Prevention Orders where relevant; classroom and school rules).
- 11.3 If the DSL of the current school identifies any concerns in relation to ongoing risk then they should update the SRRP by holding a multi-agency risk management meeting, in which the DSL of the receiving school should be invited, along with any other agencies involved with the child. The DSL of the current school must also share the safeguarding files with the DSL of the receiving school to ensure that the receiving school have the full information available about the potential risks, including the names of any other children involved in incidents of harmful sexual behaviour.
- 11.4 The DSL of the receiving school must check their records to establish if any of the other identified children who have been involved in incidents of harmful sexual behaviour attend their school or if any of them are due to transition to the school in future. In cases, where it is deemed that a child does not require a SRRP, the current school must still share their safeguarding records with the school.
- 11.5 Following an incident of harmful sexual behaviour it is possible that some children may have moved to other schools, thus minimising any potential contact with the other child/children involved. As such, when a child transitions to another school/setting, it may bring them into contact with the other child/children who were involved in the incident(s) of harmful sexual behaviour. Although it will be assessed in some cases that there is minimal risk of further harmful sexual behaviour occurring, one or more of the children who were involved may be emotionally impacted by attending the same school. For example, the child who was targeted by the behaviour may feel unsafe or afraid that something similar could happen again or the child who displayed the behaviour may feel wary of others in the school community finding out about what happened or being targeted as a result of his/her previous behaviour. It will therefore be important that consideration is given by the DSL of the receiving school to how all the children who were involved will be supported to ensure they feel safe at school. It may be deemed appropriate for each child to have an identified member of staff who could "check-in" with them to identify any concerns. The DSL should also seek the views of each child and his/her parents/carers to help inform a plan to improve the child's sense of safety while at school.
- 11.6 There will be other cases where the emotional impact of pupils coming into contact with one another must be considered in response to concerns about harmful sexual behaviour, such as when harmful sexual behaviour has taken place between siblings who may be placed at the same school.

- 11.7 In addition to the challenges of managing the contact between the children directly involved in an incident of harmful sexual behaviour, it is possible that a child may be emotionally impacted by coming into contact with the other child's siblings, parents/carers, wider family or friends. Support and arrangements should therefore be considered to help ensure the child's sense of safety. It may be appropriate to consider arrangements for transport to and from school and unstructured times of the day to manage the emotional impact of contact with the other child's family and friends.

## Appendix 1

### Flowchart for managing harmful sexual behaviour

3



<sup>3</sup> There is now a cost of £30 and a training requirement to access the Brook Traffic Light Tool [Sexual Behaviours Traffic Light Tool – Brook](#)

## **Safeguarding Risk Reduction Plan (SRRP) for Schools and Education Settings**

### **1. Guidance for Designated Safeguarding Lead and Headteacher, and additional guidance on developing a plan for a pupil who may pose a risk of sexual harm to others**

#### **1.1 Introduction:**

#### **1.2 What is a Safeguarding Risk Reduction Plan (SRRP)?**

An SRRP is required when a child presents a serious safeguarding risk – to themselves, or to other pupils/ members of the school community. Sometimes there will have been a serious incident arising from a child's behaviour in or outside of the educational establishment. On other occasions there may have been a series of incidents such as repeated absconding, threats to harm self or others, repeated mental health crises, violence or sexually harmful behaviour peer on peer and this is building a picture of increasing risk that has not responded to lower level interventions.

#### **1.3 The SRRP is for an individual plan to identify and manage risks occurring within the school for a specific child. This sits outside of:**

- The health and safety risk assessment for activities that may result in injury or ill health – in this instance the standard risk assessment template would be used; this may also be cross referenced with the SRRP.
- Individual health care plans to support children with medical conditions, this may also be cross referenced with the SRRP.
- The risk assessment proforma D promoted by ESBAS. This may also be cross referenced with the SLES SRRP.

#### **1.4 The aim of the SRRP is to provide a format for single or multi agency identification of plans to reduce risk for a child or children in school that can be shared with staff, parents/carers and where agreed appropriate the child.**

#### **1.5 The educational establishment should take a proportionate and evidence based response to risk, guided by information gathering and informed decision making. The attached risk assessment is designed to be used in consultation with all agencies involved with the child, their family and where appropriate the child themselves. This may for example include Social Care, CAMHS, Youth Offending, Police, ISEND and other specialist services.**

#### **1.6 It is not possible to eliminate all risk but by working together with an agreed plan and shared understanding the risks can be reduced and managed in the best interests of the child. The focus should be to support an inclusive approach, promoting the child's ability to participate as fully as possible in school life, without prejudice to other members of the school community. The aim of the plan should be focussed on enabling those around the child to support them to gain control of the factors creating the risk and in the longer term enable them to move forward in the most positive way.**

#### **1.7 It is important to have a clear review and updating system around the plan that reflects changing risks, recognising that some risks may be situational or time limited.**

#### **1.8 A risk plan created at any single point in a child's education is not necessarily a long term indicator of risk.**

1.9 It is anticipated that any child who is the subject of a risk reduction plan would have a current and active welfare concern file that details what has led to the development of this plan, and the intended outcome and review pattern.

## **2. Identification of a child presenting risk**

2.1 Children requiring an SRRP may be identified through a number of sources:

- As a result of behaviours displayed in the school, a serious incident or escalating series of events.
- A child joining the school from another establishment with a history of concerning behaviours, as part of short term placement or as a permanent transfer.
- A child joining the school with a plan in place from another Local Authority or education provider.
- Information received from Health, Social Care, Police, Youth Offending or specialist service.
- Parent or Carers may advise the school of concerns regarding risk.

2.2 **Examples of when a child may require an SRRP are:**

- They have made threats of self-harm
- They have been focussing sexualised behaviours or been involved in sexually abusive behaviours towards other pupils or staff
- They have been the recipient or instigator of significant bullying behaviour that other supports and interventions have not reduced
- They have made repeated, and apparently unfounded allegations towards staff and/or other children this is to protect both the child and others
- They have been the perpetrator of violence or the victim of violence
- They frequently abscond and their whereabouts are unknown

2.3 This list is not exhaustive and educational establishments must exercise judgement.

3.1 **Using the plan:**

- The plan should be created at a meeting convened by the school and attended by relevant professionals; professionals who cannot attend should provide their contributions in writing with their proposals for reducing and managing risk.
- The plan needs to be proportionate and realistic, identifying specific risk/behaviours and actions and how any action reduces the risk.
- The plan would form the minutes of the meeting and any contributing documents would be held on the welfare concern file.
- The plan is a confidential document. It should be distributed on a need to know basis with a copy held on the pupil welfare concern file. The distribution list should be agreed at the planning meeting.
- The parent/carer of the child should be involved wherever possible and contribute to the plan's completion and provided with a copy.
- The child should also be able to contribute to the plan where appropriate either by attending the meeting or providing their views and wishes through either writing; support of a trusted adult to deliver their views, perhaps creating a video or any format chosen by them.
- The child should know the outcome of the meeting and be provided with an abridged version of the action plan as appropriate for the individual. A copy of this should also be held on file.
- If there are a number of children to be considered they should have individual plans.

- The Headteacher and the Designated Safeguarding Lead should be involved in the development and implementation of the plan within the educational establishment.
- It is essential that the plan has clear actions identified linked to specific individuals or services with a clear timescale for review and contingency planning.
- All attendees should be clear of any actions allocated to them prior to leaving the meeting.
- Copies of the plan should be distributed to the attendees within 48 hours.

#### **4. Additional guidance for formulating a School-based Safeguarding Risk Reduction Plan (SRRP) for a pupil who may pose a risk of sexual harm to others**

- 4.1 Schools should use this guidance when implementing a SRRP immediately following an incident of peer on peer harmful sexual behaviour coming to light. The plan should then be reviewed with the use of this guidance at the multi-agency risk management meeting. (see 5.3)
- 4.2 It is essential that the plan is proportionate to the assessed level of risk to ensure that the child is able to experience normal social interactions with their peers, as far as possible.
- 4.3 Prior to completing a SRRP consideration should be given to the following points, as this will help ensure the plan is better targeted at addressing the risks and providing appropriate support:
- What are the alleged/reported harmful sexual behaviours?
  - Is there any evidence of what may be causing the harmful sexual behaviour?
  - Who is he/she targeting with the harmful sexual behaviour? (E.g. age and gender of child targeted; nature of the relationship between the children involved – how well do they know one another?)
  - Where and when is the harmful sexual behaviour happening?
  - What needs is the behaviour meeting for the child? (E.g. rejection in family; wanting to feel loved; own experiences of being a victim and so wanting to feel in control).
  - How motivated is the child to change their behaviour?
- 4.4 In formulating a SRRP, professionals should consider the following factors
- 4.5 Potential contact with the child targeted:**
- Does the child who was targeted appear afraid of the child who displayed the harmful sexual behaviour?
  - What are the views of the child who was targeted by the behaviour in relation to contact?
  - How does the child who allegedly displayed the behaviour present? Do they appear remorseful or is there evidence to indicate ongoing pre-occupation with the child targeted?
  - Is there any evidence of hostility/aggression from any of the children involved?
  - A child who has experienced peer on peer harmful sexual behaviour may find it distressing being in close proximity to the child who displayed the behaviour. Therefore, consideration may need to be given to whether the children can share a classroom. It will be important to seek the children's views on this.
  - Where possible the SRRP should allow the child who has been targeted to lead as normal routine as possible without fear of coming into contact with the child who displayed the behaviour.



- Is it possible to separate the children involved during the school day? A child is likely to feel safer if he or she knows there is a plan in place which will restrict the contact he or she has with the other child involved. It is important that the measures which are put in place to restrict the contact are shared with both the child who displayed the behaviour and the child who was targeted. This will enable the child who was targeted to be alert to any behaviour/actions which may not have been part of the agreed SRRP.

#### **4.6 Small schools**

- As referenced in 5.X, there are additional issues for small schools in managing these situations to avoid contact. However, staffing for additional supervision needs to be allocated in these immediate situations and school leaders should also consider staggered starts/ breaks/end of day arrangements for the alleged instigator if this would support all involved and is proportionate to the case.
- As an immediate response to the disclosure, the alleged instigator in a small school should be temporarily moved to the most appropriate class, even if this is not the correct year group, whilst further assessments are made. It is important that the school leadership team explain to the parents of this child (and if appropriate, the child themselves) that this follows statutory guidance (KCSIE 2021) and is not an indicator of guilt or blame. This situation should be reviewed at the MARRP meeting within 15 days.
- In some cases due to the ongoing level of risk from the child who has displayed the behaviour to another child at school may be so great that it is not possible to manage the risks safely within the school environment. In such cases refer to section 7.3 and 7.4 of this guidance.

#### **4.6 Contact with parents:**

- Maintain regular and open communication with all involved parents about any concerning or positive behaviour and be clear and assertive about how the school are managing the risks. Please refer to appendix 5.

#### **4.7 Supervision:**

- A higher level of supervision may be required following the discovery of harmful sexual behaviour, which may be reduced as progress is made and an assessment and /or intervention is completed.
- When a high level of supervision is required initially, this needs to be kept under review for the following reasons;
  - It is difficult for the school to sustain this long term.
  - It does not allow the child to experience normal healthy social interactions with peers or develop healthy relationships with others.
  - It places the responsibility for controlling the behaviour with the adult and not the child. If this is removed the child has no experience of taking responsibility and controlling their own behaviours and their behaviours are likely to remain risky.
  - Decisions on whether to make any changes to the safety plan need to be agreed with the whole safety network (including, other professionals and parents/carers).

#### **4.8 Unstructured times:**

- Are the risks such that it will be necessary to supervise the child during unstructured times of the day?
- How are staff going to monitor the child during unstructured times of the day (such as break and lunch times)?

- What can be put in place for the child during unstructured times of the day to ensure they still have contact with their peers, albeit in a supervised setting?

#### **4.9 School environment**

- Keep in mind the high risk areas in the classroom (e.g. any areas of the classroom where staff's view could be obstructed); times of the school day (e.g. changing for PE, break-times) or the school environment (e.g. school toilets). Do special arrangements need to be made for the child in terms of where he or she sits in the classroom? Where they stand when queuing? Where should the child sit when the class are having carpet time? Does the child need to be escorted between lessons?
- What measures could be put in place to reduce the risks? (E.g. use of single cubicle toilets only (disabled or staff toilets).

#### **4.10 Transport issues:**

- Is the child assessed to pose a risk to others outside of the school environment?
- Is there any evidence to suggest the child who displayed the behaviour may be at risk from others in the school community/outside community as a result of the alleged/reported harmful sexual behaviour?
- How will the child travel to/from school and what times will they arrive/leave school?

#### **4.11 Off-site activities:**

- What additional measures need to be put in place for off-site school trips? Can the risks be safely managed?
- If an incident occurs or there is evidence of increasing risk during an off-site school activity (including overnight trip), can arrangements be made for the child to be sent home?

#### **4.12 Recording:**

- Accurate, detailed and comprehensive recording is essential to be able to understand problematic or harmful sexual behaviours and to plan effective interventions. Be clear, record what you saw or heard, e.g. "Pupil A touched Pupil B on the genitals over clothing with an open hand and left it there for 5 seconds". Don't just record "Pupil A behaved sexually inappropriate to Pupil B". This can mean many different things and can be misleading.
- All school staff should record and notify the DSL of any low level incidents, such as "Pupil A smacked Pupil B on the bottom and said he looked sexy". While this behaviour may be the child "larking about", it should not be tolerated or passed off as 'banter', just having a laugh', or 'part of growing up' it could also conform to a pattern of sexualised behaviour observed by other staff. Good communication and sharing of information enables professionals to identify concerns more quickly.

#### **4.13 Information sharing:**

- Disclosure of the harmful sexual behaviour and the child's risk factors should only be made to relevant school staff (such as class teacher) or other professionals when deemed essential. The parents/carers should be made aware of any staff or other professionals who have been made aware.

#### **4.14 School clubs:**

- A lot of school clubs are run by outside providers. Consideration will therefore need to be given to whether the child can take part in the activity safely. It may be appropriate to consider alternative changing facilities depending on the

supervision of the child and whether disclosure to the activity provider is necessary.

- The school should inform the parents/carers of what action they would need to take to ensure the child could take part in the activity safely.

**4.15 Support for the child/young person:**

- Does the child have a clear understanding of the expectations of the school in terms of his/her behaviour?
- What social activities can the child be engaged in to promote positive peer relationships?
- What is the child's understanding of relationship and sex education? Does additional support need to be offered?
- Does the child need to be referred for specialist assessment/intervention?
- Who will regularly check-in with the child to provide emotional support? Children are more likely to feel secure knowing there is someone they can speak to about any problems they may be having or any concerns they have.

4.16 The initial SRRP should be formally reviewed and finalised at the multi-agency professionals' meeting within 15 days of the incident coming to light. Following this, the SRRP should be regularly reviewed; initially by the school at least on a weekly basis for the first month, with a view to then setting review dates at longer periods, such as monthly or termly to identify if the risks have reduced or increased and whether the child requires any additional support. As time passes it will be important to consider whether the restrictions on the plan can be relaxed, as otherwise this creates a situation where adults become responsible for managing a child's behaviour rather than the child him/herself. Any significant changes in the plan should be agreed at a further multi-agency professionals' meeting in order to ensure that the school has support in making these decisions.

Appendix 3

Safeguarding Risk Reduction Plan (SRRP)

INSERT NAME OF SCHOOL School-based Safeguarding Risk Reduction Plan Date:			
Child's details			
Name	DOB/age	Class/Year group	
Adults included in the development of the plan			Relationship and contact detail
Details of decision regarding parent/carer or pupil involvement – if not included in meeting specify why and how their views and wishes are conveyed.			
Specify any issues of SEN, Child Protection, Race, Culture or Diversity			

### Reason for risk management plan:

(Summary of concerns leading to a plan being implemented; consider triggers, control mechanisms, specify the risk or risks and who is at risk. It may be helpful to outline actions that have previously been tried and whether they were successful or not.)

Example: was there a specific incident, escalating behaviour, history

### Timescales:

(Duration of plan, review dates and any additional specifics)

### Date plan to start:

### Please add any supplementary details relevant to this plan:

(Any relevant additional details not already identified i.e. If there are other pupils with linked plans, any legal factors that need to be considered)

### Give details any known strategies or precautions required to avoid/manage/predict the behaviour/risks and specific triggers to be avoided

**DETAILS:** i.e. enclosed spaces, loud noises, male/female worker, no lone worker, after specific intervention sessions (CAMHS, Therapy) significant dates of bereavement, actions likely to occur

### Are there any other risks/concerns that you feel should be considered that are not directly linked to this plan.

**PLEASE GIVE DETAILS:** i.e. Known CSE risk, parental actions. other student responses

Please identify any essential documents that should be read or consider and where they can be located.  
*Assessments, expert reports/assessments/chronologies/Sen plan, EHCP etc.(ANY PLAN)*

**PLEASE GIVE DETAILS (INCLUDING DATE AND LOCATION OF DOCUMENT):**

<b>Risk Assessment</b> (Please put an x to mark the relevant number)						
<b>IDENTIFIED RISK</b> (Please adapt to suit the situation/risk) Score only those that apply. <i>All headings can be changed/deleted to reflect the situation</i>	1 = LOW 5 = HIGH	1	2	3	4	5
<b>Child Protection Issues:</b> Risk of abuse to children. <i>Define type and detail: Sexual, physical, emotional or neglectful.</i>	SEVERITY					
	LIKELIHOOD					
<b>Risk of violence:</b> <i>Of child/parents/adults towards other children, adults and staff members. Domestic violence, threats of violence.</i>	SEVERITY					
	LIKELIHOOD					
<b>Risk to self:</b> <i>Alcohol and Substance misuse, Self harm and suicide</i>	SEVERITY					
	LIKELIHOOD					
<b>Risk of inappropriate sexualised behaviour:</b> <i>Of child/parents/adults towards other children and staff.</i>	SEVERITY					
	LIKELIHOOD					
<b>Offending behaviour, anti-social behaviour of child/parents/adults:</b> <i>Risk to persons, property or possessions, fire setting.</i>	SEVERITY					
	LIKELIHOOD					

Neglect issues: Parental contact issues, Parental conflict	SEVERITY					
	LIKELIHOOD					
Other: e.g. Absconding/on line safety	SEVERITY					
	LIKELIHOOD					

TO BE COMPLETED BY THE HEADTEACHER AND DESIGNATED SAFEGUARDING LEAD				
Total = Severity x Likelihood	SEVERITY	LIKELIHOOD	TOTAL	LEVEL OF RISK: 1-8 LOW 9-15 MEDIUM 16-25 HIGH
Child Protection Issues:				
Risk of violence:				
Risk to self:				
Risk of inappropriate sexualised behaviour:				
Offending behaviour, anti-social behaviour of child/parents/adults:				
Neglect issues: Parental contact issues, Parental conflict				
Other: Other: e.g. Absconding/on line safety				



## Matrix Guidance

Risk Level = LH x LS			
Likelihood		Severity	
1	Very Unlikely	1	Has occurred once, assessments indicate this is not likely to be repeated.
2	Unlikely	2	The severity of the incident/behaviour is low and reoccurrence is predictable and with risk management plan in place reoccurrence is reduced. Unlikely to cause serious harm to self, others or property.
3	Likely	3	The frequency and severity of the incident/behaviour is high (weekly or unpredictable) with risk of injury to self or others assessed as likely with a potential for harm or injury to self. Others or property (i.e. physical/sexual/mental health etc.). Risk management plans have not reduced risk. (Consider RIDDOR)
4	Very Likely	4	The frequency and severity of the incident/behaviour is very high (2 or more times a week or unpredictable) with risk of injury to self or others assessed as likely with a potential for serious harm or injury to self. Others or property (i.e. physical/sexual/mental health etc.). Risk management plans have not reduced risk, child or family not cooperating with risk management plan). (Consider RIDDOR)
5	Almost Certain	5	Fatality or Disability is likely. (Consider RIDDOR)

INSERT NAME/LOGO OF SCHOOL HERE

<b>Risk Management Action Plan for: <i>insert name of child</i></b>	
<b>Date of Plan:</b>	<b>Review Date:</b>
<b>Distributed to: <i>List all people to receive a copy of the plan</i></b>	
<b>Lead Professional:</b>	<b>Contact details:</b>

Risk detail	Action	Person responsible	Contingency plan
(example) Child A has previously opportunistically touched another student when queuing.	Child A to be placed at the front of any queue until next review date	All staff to be advised by DSL	Should not comply with the plan this is to be immediately reported to the DSL for review.
(example) Child B has been self-harming by cutting himself at home and has been threatening to do this at school. He has brought sharp implements into school.	This would need to be broken down further – 1 - may bring sharp implements into school 2 –may cut himself As you can see both will require different responses		I think this example needs further work, or we change it for another

Date risk assessment and plan agreed	Name and role in school	Signature
	Headteacher	
	Designated Safeguarding Lead	

## Appendix 4

### 1. Information for parents on what happens following an incident of harmful sexual behaviour at school

#### 1.1 How the school should respond to an incident of harmful sexual behaviour:

1.2 When there is an incident of harmful sexual behaviour between children at school or outside of school, the school have a responsibility to assess the seriousness of the behaviour, in the context of whether the behaviour is healthy, problematic or harmful, which will take into consideration the following factors:

- The type of behaviour witnessed or being reported.
- The context the behaviour occurred in (i.e. was it planned or spontaneous, was it meant to cause harm or not).
- How does the child who is alleged to have perpetrated the harmful sexual behaviour react when questioned about their behaviour?
- How does the child who has been targeted respond/ feel about the behaviour (i.e. are they upset, fearful or were they engaging in the behaviour freely).
- What the power dynamics between the children involved (e.g. any power differences in respect of age, size, status, ability, strength, personality).
- How often has the behaviour occurred?
- How easy is it to re-direct the child who is perpetrating the harmful sexual behaviour to alternative activities?
- Background information regarding the children involved (family support, any known behavioural concerns).

1.3 In some instances the school will assess that the behaviour being witnessed or reported does not require intervention or input from any other services and in these cases the school will be able to respond appropriately in collaboration with the children's parents. For example, none of the children involved may appear distressed and may have all been freely engaging in the behaviour. In such circumstances, the school may be able to provide education to the children involved about personal boundaries and safe touch.

1.4 In cases where the school assess the behaviour(s) being reported or witnessed to be more serious, they have a statutory duty to refer their concerns to Children's Services. The referral will include all the children who have been involved.

1.5 If possible, the school should make the parents of all the children who have been involved aware of the concerns the same day the harmful sexual behaviour was discovered by staff. At the referral to children's social care stage, schools and colleges will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care and recorded within the safeguarding files within the school. If the school are able to advise parents of the concerns they should explain to the parents what action they are taking (i.e. referral to Children's Services and why; what safety planning measures will be put in place to protect all children and when these will be reviewed).

## **2. Children referred to Children's Services:**

- 2.1 All referrals will be screened by the Single Point of Advice (SPOA) team, unless the referral has been made by the Police and then these referrals will go straight to the Multi Agency Safeguarding Hub (MASH) for consideration.
- 2.2 In lots of cases there will be no need for any involvement from a Social Worker following the initial referral. The SPOA worker may be able to help identify appropriate support for children, this work could include protective behaviours' work to help them identify safe and unsafe touches and who they could talk to if they have any worries. This work could be offered by Early Help Services or the school. These referrals would not progress to MASH.
- 2.3 If a referral goes through to the MASH team, then a social worker would make contact with the parents of each referred child to discuss the individual support needs of each child and assess what could be offered. The MASH Social Worker will consider whether the case can be referred to another agency for assessment or intervention work or if the case requires Children's Services' oversight due to the identified risks.
- 2.4 Some children who are targeted by other children may believe they are to blame for the harmful sexual behaviour and may show their distress and upset at what has happened to them through their behaviour, sleep, play, eating habits and various other symptoms. Parents can be offered support to help understand how the harmful sexual behaviour may be affecting their child and how they can support him or her to overcome what has happened.
- 2.5 The child who has displayed harmful sexual behaviour and his or her parents will also be offered support to understand his or her behaviour. This may include assessment, as well as some intervention work to equip the child with the strategies he or she needs to ensure they make safe choices and are aware of the consequences of their behaviour.

## **3. Support for Parents**

- 3.1 When it comes to light that a child has been involved in an incident of harmful sexual behaviour (including the child who has been targeted by a peer or the child who has led the behaviour) with a peer at school, this can impact on the child's parents in many different ways. Support can be given to parents by professionals, including advice on how to respond and support their children as a consequence of what has happened.
- 3.2 There are many online resources which provide useful information to parents about how they can support their children to stay safe:
- [Parents Protect](#)- This is an information and resources website, which aims to raise awareness about child sexual abuse, answer questions and give adults the information, advice, support and facts, they need to help protect children. It includes an online learning programme about child sexual abuse for parents. It also has links to lots of different useful resources.
  - [Mosac](#) – Mothers of Sexually Abused Children - This website is an excellent resource for mothers/parents of children who have been sexually abused. They have a number of factsheets to support parents in responding appropriately to disclosures; supporting their child in the aftermath of abuse; and, the legal process.

- [NSPCC | The UK children's charity | NSPCC](#) – National Society for the Prevention of Cruelty to Children. The NSPCC “Underwear Rule” resource can be found on their website. The “Underwear Rule” is a simple way for parents to teach their children that their body belongs to them, they have a right to say no, and that they should tell an adult if they’re upset or worried.
- [Info and advice | Childline](#) Provide free and confidential advice for children and young people.
- [Homepage | Internet Watch Foundation \(iwf.org.uk\)](#) works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
- [Remove a nude image shared online | Childline](#): Remove a nude image shared online *Report Remove* is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

## **Appendix 5**

### **Suggested scripts for head-teachers/DSLs to use when communicating with parents after an incident of alleged peer on peer harmful sexual behaviour has occurred:**

#### **Immediately following an incident being observed/reported:**

Prior to speaking to any of the parents/carers of the children involved it is important that advice is sought from SPOA about whether it is okay to speak to the parents in cases where the behaviour is assessed to be harmful or high level problematic.

If after consultation with SPOA it is agreed that the parents/carers can be informed or in cases where consultation with SPOA is not deemed appropriate due to the alleged behaviour being assessed as healthy or low level problematic then the scripts below are suggested ways to communicate the concerns to the parents of all children involved.

Prior to exploring the alleged concerns with the parents/carers, it can be useful to help them (but also you as the professional) to feel more comfortable talking about a sexual incident and body parts by agreeing terminology with the parents/carers. Explain to the parents/carers that there are lots of different words used to describe a person's genitals so to avoid confusion you are going to use the scientific names for male and female genitalia (e.g. penis, vagina, breasts).

#### **Communicating with the parents/carers of the child who displayed the alleged behaviour**

##### **Be clear about what has been alleged/observed:**

Be specific about what has been alleged so the parents/carers do not misinterpret what has been happened. For example, do not state:

- “An allegation of sexually inappropriate behaviour has been made against your son by a 13 year old girl in his form”.

Such language may confuse the parents/carers and lead them to exaggerate or minimise the incident as “sexually inappropriate behaviour” could refer to an act as serious as rape or to a behaviour assessed as less serious, such as a child touching another child on the bottom over clothing. Instead be clear about what has been alleged:

- “Carly, a 13 year old girl in Jon’s class has said that he grabbed her breasts over her school shirt when they were on the field this lunch time. She has alleged he held his hand there for about 5 seconds despite her telling him to get off and attempting to get away.”

##### **Explain why their child has been referred to Children’s Services:**

To help avoid the parents/carers of the child who has had an allegation of harmful sexual behaviour made against them becoming defensive, it is helpful to use language which focuses on the behaviour of the child being of concern rather than the child him/herself. For example, avoid using statements which appear to suggest the child is the problem, such as:

- “As Jon is an alleged perpetrator of harmful sexual behaviour we’ve referred him/her to Children’s Services”
- “Due to your child being assessed as posing a risk, we are required to refer him/her to Children’s Services”.

Such statements may cause parents to feel their child is being labelled and blamed for what has happened.

**Instead try:**

- “When there is an incident of harmful sexual behaviour between children, the school have a responsibility to assess the seriousness of the alleged behaviour. In considering what has been alleged/reported, we have assessed the alleged behaviour to be an example of harmful sexual behaviour. In such cases we are required to refer the children who have been involved to Children’s Services. As such, a Social Worker may contact you to discuss what has happened and to assess what support for your child would be helpful. I have a leaflet here which explains the process.” (see appendix 3 for the leaflet)
- “Our school uses an assessment tool to help us assess if the alleged sexual behaviour is healthy, problematic or harmful. Using this tool, the alleged behaviour has been assessed as harmful sexual behaviour and as such we have a statutory duty to refer your child to Children’s Services. A Social Worker will be in contact with you to discuss appropriate support for your child. This leaflet explains why your child has been referred to Children’s Services” (see appendix 3 of the protocol for the leaflet).

Using these types of response will help the parents/carers to feel their child is not being singled out or unfairly labelled. They will also be provided with information about what is happening and thus feel informed about the referral process.

**Who will establish what has happened/investigate the concerns?**

***For children aged 10 and over.***

- “Due to the nature of what has been alleged, it is possible that the Police may investigate the concerns. This is likely to be decided in the next couple of days. If a Social Worker is allocated to your child it is likely they will ask them about what happened and assess what support and needs they may have. The School will then hold a meeting with the Social Worker and any other relevant professionals to assess what is likely to have happened between the children based on the available information, which will then inform the school’s safety plan moving forwards. This meeting will take place within 10 working days”.

If the case is not allocated to a Social Worker/Police

- “I/(Mr/Mrs ?) will be speaking to Jon and Carly and any pupils who witnessed the incident in the next few days to find out more about what happened. The school will then hold a meeting to assess what is likely to have happened between the children based on the available information, which will then inform the school’s safety plan moving forwards. This meeting will take place within 10 working days”.

### **For children under 10**

- “If a Social Worker is allocated to your child it is likely they will ask them about what happened and assess what support and needs they may have. The School will then hold a meeting with the Social Worker and any other relevant professionals to assess what is likely to have happened between the children based on the available information, which will then inform the school’s safety plan moving forwards. This meeting will take place within 10 working days”.

If the case is not allocated to a Social Worker/Police

- “I/(Mr/Mrs ?) will be speaking to Carly and Jon and any pupils who witnessed the incident in the next few days to find out more about what happened. The school will then hold a meeting to assess what is likely to have happened between the children based on the available information, which will then inform the school’s safety plan moving forwards. This meeting will take place within 10 working days”.

### **Explain the need for a safety plan (SRRP):**

Again avoid using language which the parents may interpret as their child being judged to pose a risk, such as “perpetrator”; “sex offender”; “he/she is a risk of sexual harm”. Use language which focuses on the alleged behaviour:

- “When a pupil is alleged to have displayed harmful sexual behaviour, as a school we have to follow a protocol in responding to the concerns. As such, we are required to put in place a Safeguarding Risk Reduction Plan (SRRP). This means we need to identify any potential risks during the school day and put measures in place to keep your child and other children safe. This may include us thinking and agreeing about supervision of your child at break and lunch times, toileting arrangements and how he/she gets to and from school”.
- “As a serious behaviour has been reported we have a duty as a school to put a Safeguarding Risk Reduction Plan in place to protect your son/daughter, as well as other pupils. We would appreciate your input with this”.
- “Until we have assessed the situation and risks more fully, we will need to put a plan in place to ensure everyone is kept safe, including your child. As such for the time-being we will be asking your child to report to the school office at break and lunch times. This will help to ensure no further allegations can be made against him. We will review the SRRP within 10 working days once more information is known.”

### **Explore what support their child could access at school**

- “I’m mindful this will be a stressful time for your son and he may feel worried about being at school. As such, his form tutor, Ms Smith will arrange to have regular check-ins with him so if he feels worried or any issues come to light these can hopefully be dealt with quickly”.
- “What support do you feel would be helpful for Jon?”



## **Communicating with the parents/carers of the child(ren) who was/were targeted by the alleged behaviour**

### **Be clear about what has been alleged/observed:**

As with the parents of the child who displayed the alleged harmful sexual behaviour, it is important to be specific about what has happened to ensure parents do not misunderstand what has been alleged. It is therefore important to tell the parents what the behaviour of concern is, who was involved and where and when it happened:

- “After lunch Carly found her teacher and disclosed that Jon, a boy in her class, grabbed her on the breasts over her top for about 5 seconds. She said he would not let go despite her telling him to do so and her attempting to get away. Carly was upset when recalling what had happened”.

It is important to ensure that no language is used which could minimise the alleged victim’s experience. Therefore, by keeping the description factual while also acknowledging how the child may be feeling should enable the parents/carers to feel that their child has been listened to.

### **Also, inform the parents/carers what you have done to protect the immediate safety of their child:**

The parents/carers of the child who has been targeted by the behaviour will want reassurance that their child’s safety has been prioritised and that their child’s allegation is being treated seriously:

- “We took the boy who Carly said touched her breast out of class for the rest of the day following her disclosure and we have made special arrangements for him to be collected from school today. I asked Carly if she wished to return to class for the rest of the afternoon and she said she preferred to do so. I will be putting a plan in place to reduce any potential risks and to help Carly feel safe at school. This will start immediately”

### **Explain how the safety plan will keep their child safe:**

- “To ensure that Carly feels safe at school, we have made arrangements so that she and Jon are not in any of the same classes. Special arrangements have also been made for Jon at break and lunch-times so that Carly’s routine or school life is not disrupted. In addition, an agreement has been made with Jon and his parents for his travel to and from school which will help to ensure Carly does not see him on her way to or from school”.
- “We want Carly to feel safe and supported at school so Ms Smith will meet with her regularly to check how she’s feeling and to address any concerns”.

### **Who will establish what has happened/investigate the concerns?**

*For children aged 10 and over.*

- “Due to the nature of what has been alleged, it is possible that the Police may investigate the concerns. This is likely to be agreed by the Police and Children’s Services in the next couple of days. If a Social Worker is allocated to your child it is likely they will ask them about what happened and assess what support and needs they may have. The School will then hold a meeting with the Social Worker and any other relevant professionals to assess what is likely to have happened between the children based on the available information, which will then inform the school’s safety plan moving forwards. This meeting will take place within 10 working days”.

If the case is not allocated to a Social Worker/Police

- “I/(Mr/Mrs ?) will be speaking to Carly and Jon and any pupils who witnessed the incident in the next few days to find out more about what happened. The school will then hold a meeting to assess what is likely to have happened between the children based on the available information, which will then inform the school’s safety plan moving forwards. This meeting will take place within 10 working days”.

***For children under 10***

- “If a Social Worker is allocated to your child it is likely they will ask them about what happened and assess what support and needs they may have. The School will then hold a meeting with the Social Worker and any other relevant professionals to assess what is likely to have happened between the children based on the available information, which will then inform the school’s safety plan moving forwards. This meeting will take place within 10 working days”.

If the case is not allocated to a Social Worker/Police

- “I/(Mr/Mrs ?) will be speaking to all the children involved in the incident in the next few days to find out more about what happened. The school will then hold a meeting to assess what is likely to have happened between the children based on the available information, which will then inform the school’s safety plan moving forwards. This meeting will take place within 10 working days”.

**Explore what support their child could access at school**

- “I’m mindful what has happened will have been very upsetting for Carly and she may feel worried about her peers finding out or seeing Jon. As such, her head of year, Ms Jones will arrange to have regular check-ins with her so if she feels worried or any issues come to light these can hopefully be dealt with quickly”.
- “What support do you feel would be helpful for Carly?”
- “We have a school counsellor who we could refer Carly to if you think this would be helpful?”

## **Appendix 6**

### **Key communications challenges/considerations:**

**Schools should carefully consider the following and apply as appropriate with any incident that arises:**

#### **Judgment on when to communicate more widely**

A decision should be taken, and reviewed regularly, about whether details of an incident should be communicated more widely. There will be various factors that guide this decision but they are likely to include:

- the level of discussion and awareness amongst parents
- the risk of causing more of an issue than is necessary
- the need for transparency and openness
- the importance of parental confidence in the school
- the need to address misinformation, gossip, or inappropriate conversations

#### **Flow of information**

Schools should recognise the importance of communicating. If they don't fill the information void, it is likely to be filled with gossip, speculation, rumour, and misinformation. Once the snowball has started rolling it will be difficult to stop;

#### **What is appropriate to say and when**

Confidentiality issues relating to individuals or to an on-going process (whether that be the incident investigation, or a criminal or disciplinary process) will always compromise what a school can say and when. However, a school can still say something – even when saying nothing – that will at least let parents know a situation is being taken seriously and addressed urgently;

#### **The need for reassurance**

This is key. Whatever a school's messaging and at whatever the stage, this is what schools should strive for. Parents need to have confidence – that something is being taken seriously, that action is being taken, that it is being investigated properly, that their children's safety is paramount etc. A robust and personal language and tone should be adopted;

#### **The promise to update when possible and delivering on that**

If an on-going investigative, criminal or disciplinary process means a school cannot share more information, it should at least ensure parents understand this. A school should promise to update parents as soon as possible, and as appropriate;

#### **Social media discussion**

Social media gives parents the opportunity to share information and views much more quickly and for misinformation to spread. Schools should ensure they use official channels to get definitive and accurate information issued. Managing social media effectively includes knowing the admin of any parents' groups and challenging inaccuracy if appropriate;

#### **Channels**

As part of its wider communications strategy a school should decide which channels it is going to use to engage with parents. Creating reliable definitive channels people can rely on and will turn to for the truth will lead to clarity of message;

### **Remembering all audiences**

There's a temptation to think only of parents. Schools should not forget other potential audiences – governors, staff, pupils, the wider community...and, of course, the news media;

### **Agreeing messaging**

Schools should always be very clear on what they are saying, what they are able to share, and should be consistent across different channels and audiences. Messaging and language should be kept succinct and simple. Schools should design messaging for the audience and keep technical words and language, acronyms etc, out of it.

### **Agreeing ownership**

A school should always be clear on who owns the communications process and agreeing messaging, timings etc. This is likely to be the head teacher but might need to be the CoG depending on the circumstances;

### **Know who you are working with**

In the event of an incident a school should always be very clear who the key people are that it is working with on the issue – at ESCC, or any other partners. Efforts should be made to ensure all are kept in the loop and are updated. Beware email trails and missing people out.

### **Plan ahead**

Once the first communications hurdle is cleared, it's important to consider what happens next – with the process and supporting communications. Schools should identify at what stages it may need to do comms and to whom.

**Seek support** from the ESCC comms team.