

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



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

After reading through this document if you have any queries or require further advice about the processes you should be following, please email [SLES Safeguarding](#) or call 01323 464949.



Sussex Police

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1. Introduction and quick read checklist of actions

- 1.1. This document provides detailed local guidance on how schools should respond to incidents of child-on-child sexual harassment, sexual violence, or harmful sexual behaviour. This is a potentially complex area of practice and where it arises then this guidance should be read and followed in full.

- 1.2. Some cases of harmful sexual behaviour can be managed by a school alone whereas some cases will require a multiagency response, notably Children's Social Care or the police, but other services may be involved too, including those from the voluntary sector. Where other agencies are involved then they should play a full part in the Safeguarding Risk Reduction Plan which will need to be in place to identify and manage potential risks (see section 4 for more detail). Where necessary the school may find it helpful to share this document with relevant individuals from those agencies, when inviting them to contribute to a plan, so that they are fully aware of the guidance which schools are working with.
- 1.3. The following checklist is to support school practitioners with ensuring appropriate steps have been taken. It is not a substitute for reading the full document, but an aide memoire to support the immediate broad response to an emerging incident.

Quick read checklist of actions to follow subsequent to an incident

- Stop the behaviour
- Assess the behaviour
- Speak with the children: ensure you consult the full document, as there are times when you should not
- Speak with the parents: ensure you consult the full document, as there are times when you should not.
- Before speaking with parents and carers or children involved, consult the separate guidance documents below, which provide advice on how to have these conversations. These are available on Czone:
 - [Communicating with parents](#)
 - [Supporting children and young people who have displayed harmful sexual behaviour](#)
 - [Supporting children who have experienced sexual abuse](#)
- Where the behaviour is assessed as harmful make a referral to SPOA

- Where a crime is believed to have been committed, report to the police. Please refer to additional guidance from Sussex Police in [Appendix 1](#) for further guidance on when and how to contact the police.
 - If a Strategy Meeting is convened, then ensure SLES Safeguarding are invited to support the process
 - Even without a Strategy Meeting, if you feel you need support then contact SLES Safeguarding
 - Immediately formulate and implement a Safeguarding Risk Reduction Plan for all children involved, where the behaviour is assessed as harmful or problematic. Contact SLES Safeguarding, if needs be, for additional support with this
 - Consider whether you may need support with a communications strategy: if so contact SLES Safeguarding, and signposting can be provided
 - Ensure that all reports, actions, emails, telephone calls and outcomes are clearly recorded on the individual safeguarding file of all children involved
- 1.4. 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).
- 1.5. For the purposes of this document all educational establishments will be referred to as schools and all children and young people will be referred to as children.
- 1.6. Rather than use the terms perpetrator and victim, as is often the case in government guidance, this document will use the terms child who has harmed and child who has been harmed.

1.7. 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. We have learned from a number of largescale pieces of research that the aetiology [cause] of harmful sexual behaviour in childhood and adolescence is complex and multifactorial (e.g., Seto and Lalumière, 2010; Fox 2017). It often includes experiences of abuse and maltreatment, which may or may not have taken place in the family home, in the backgrounds of children who display this behaviour. Physical abuse, sexual abuse, neglect and witnessing domestic abuse often feature. A UK-wide study of 700 children who displayed harmful sexual behaviour found that 66% had experienced some form of maltreatment (Hackett et al, 2013).

2. Responding to concerns

2.1. The member of staff who sees, hears or is informed (by either a parent or child) 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:

- o Describe the behaviour. What did the child say or do?
- o Context of the behaviour. Was it spontaneous or planned? Was there any force or aggression?
- o When and where did it happen?
- o Relationship between the children - are they the same age? Any power differences? Are there any significant SEND needs?
- o Response of the child who initiated the behaviour?
- o What was the response of the child who was targeted?

2.2. Using a tool (e.g., ESCC or Brook Traffic Light Tool), which provides a framework for identifying whether the reported or observed behaviour is part of a healthy development or a cause for concern, the DSL should assess whether the reported or alleged behaviour is

- Green: normal or developmentally appropriate
- Amber: inappropriate or problematic
- Red: abusive, violent or harmful

2.3. To inform the assessment of the behaviour, the children involved will need to be spoken with:

- Before speaking with the children involved, consult the separate guidance documents below, which can give you advice on how to have these conversations. These are available on Czone:
 - o [Supporting children and young people who have displayed harmful sexual behaviour](#)
 - o [Supporting children who have experienced sexual abuse](#)
- The child who has reported the behaviour, or who is reported or alleged to have been harmed will always need to be spoken with and they should be reassured that their concerns are being taken seriously and that they will be kept safe.
- If the initial report, or presenting evidence suggests the behaviour may be green then the other child or children involved should also be spoken with.

- If the initial report, or presenting evidence suggests that the behaviour may be amber or red then the other child or children should be spoken with as well, but professional judgement should be used as to when not to, where this may seem inappropriate e.g., there is a history of sexual abuse or it is considered that the child who has been harmed may be at increased risk if the child who has harmed is made aware of the reported concerns.
- The purpose of speaking with children is to gather only enough information to establish the facts. It is not the role of the school to investigate anything at this stage.
- The exact questions asked of the child or children, along with their responses should be noted, as if the police do become involved this information is important to any subsequent investigation.
- If new information emerges, which suggests a crime may have occurred, then no further questioning of children or enquiry by the school should occur until it has been reported to the police and guidance provided from them on how to proceed.
- If the initial report, or presenting evidence suggests that the behaviour may be criminal in nature and require a police response then the child who is reported or alleged to have caused the harm should not be spoken with until advice has been sought from the police.
- Please refer to additional guidance from Sussex Police in [Appendix 1](#) for further guidance on when and how to contact the police.

2.4. The parents and carers of the children involved will also need to be spoken with, unless doing so would create further risk for the child.

- Where no additional risk is created then the parents of the child who has been harmed should always be spoken with
- When deciding whether to speak with the parents of a child who is alleged to have caused the harm then additional consideration must be given to possible police involvement. Where a crime may have been committed then these parents should not be spoken with until advice has been sought from the police. Please refer to additional guidance

from Sussex Police in [Appendix 1](#) for further guidance on when and how to contact the police.

- Before speaking with parents and carers, consult the separate guidance document: [Communicating with parents](#) for additional guidance on how to approach these conversations

2.5. After having spoken with children and parents, as outlined above, and assessed the behaviour:

- If the behaviour is assessed to be red, then an immediate referral must be submitted to the Single Point of Advice (SPOA)
- If the children involved are already open to Children's Social Care, then the allocated social worker should be contacted, rather than SPOA
- If a crime has been committed, then the police should also be contacted. Please refer to additional guidance from Sussex Police in [Appendix 1](#), for further guidance on when and how to contact the police.

2.6. If the behaviour is assessed to be amber, then a referral to SPOA should also be considered in the following circumstances:

- When there is a pattern of the child or young person displaying inappropriate or problematic sexual behaviour
- When the child has not responded to intervention or redirection to address a previous behaviour
- When the child or young person shows other symptoms of abuse or trauma
- For younger children, when the context of the child's behaviour appears to suggest the child has an adult understanding of sex, indicating possible experience of abuse or exposure to sexual activity

2.7. In cases when the incident of amber behaviour appears isolated and there are no other concerns which have been identified, it is likely that the behaviour can be addressed with redirection and by discussing issues around

consent, privacy and okay or not okay touches with the child or young person, without there being a need for referral to SPOA.

- 2.8. When referring an incident to the police it is important to explain to the children and parents involved that the law is in place to protect children and young people rather than to necessarily criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- 2.9. When the decision is made to report an incident to the police for investigation, due to the seriousness of the incident or for other aggravating circumstances, the school should cease their own enquiries.
- 2.10. Once any referral has been made to Children's Social Care, the police, or both, then the school should ensure that they receive clear direction from those agencies as to how the school should proceed with safeguarding the children involved.
- 2.11. In cases where the reported behaviour is assessed to be green it is likely that this can be wholly managed within the school and the response may be as simple as advising children about safe touch and boundaries. 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.
- 2.12. An incident of green behaviour must still be recorded on the safeguarding record of the children involved, with reference to the assessment tool, the analysis of the behaviour and the outcome e.g., 1:1 work with the child about NSPPC Underwear Rule etc.

3. Cases referred to Children's Services

- 3.1. 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).

- 3.2. If the referral is made by police, it will be directly routed to the relevant MASH team and screened by a MASH Social Worker
- 3.3. 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. Here is a link to the [Sexual Behaviour Screen Resource for Children and Young People \(eastsussex.gov.uk\)](https://www.eastsussex.gov.uk/sexual-behaviour-screen-resource-for-children-and-young-people).
- 3.4. When a referral is made to Children's Social Care 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 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 Social Care's oversight due to the identified risks. Decisions will be guided by the Continuum of Need indicators and overseen by a social work practice manager.
- 3.5. 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](#).
- 3.6. The school should be invited to the strategy meeting, and it is imperative that the DSL or Headteacher attends. The SLES safeguarding Team should also be notified and invited to attend.

- 3.7. 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.
- 3.8. At the conclusion of the strategy meeting the school should ensure that they are completely clear on the following:

What is the role of Children's Social Care?

- If it goes to assessment, then is there a names team or social worker?
- If there is no further action, then who from Children's Social Care will communicate this to the parents and when?

What is the role of the police?

- Is there a named team or investigating officer?
- If there is no further action, then who from the police will communicate this to the parents and when?

With or without involvement from Children's Social Care or the police, are there any actions which the school must or mustn't do e.g.,

- Ensure the children do not come into contact with each other at school
- Speak with child A, but do not speak with child B until the social worker has made contact
- Do not speak with the parent of child B until advised to do so by the police

4. Immediate considerations for the school in managing the situation

- 4.1. When it is considered proportionate for a Social Care assessment or a police investigation to be opened then the child or children, families and school must be aware that, depending on the circumstances of the case that, those

assessments and investigations will in many cases be lengthy and could last a number of weeks or months.

- 4.2. Whether there is social care, police involvement, both, or not, when it comes to light that an incident of child-on-child harmful sexual behaviour may have occurred on or off the school site then the school must take immediate steps to safeguard all of the children involved and manage any potential ongoing risks.
- 4.3. The framework for identifying risk and managing, monitoring, reviewing and recording this is a Safeguarding Risk Reduction Plan (SRRP). An individual SRRP should be completed for all the children involved in any incident of child-on-child harmful sexual behaviour as soon as possible after the incident becomes known.
- 4.4. Further guidance on the completion, review and conclusion of SRRPs is within [Appendix 5](#).
- 4.5. In formulating a SRRP, the needs and wishes of the child who was harmed should be considered to ensure that child is able to continue with his or her normal routine.
- 4.6. The SRRP for the child who is alleged to have caused harm should include how their emotional needs and well-being will be supported.
- 4.7. The SRRP should consider such things as: how the children's classes will be arranged (to minimise or avoid contact), additional supervision in class and during unstructured times of the school day; toilet arrangements; transport to and from school; off-site activities and the risk posed to the children within and outside the school community. This approach is outlined in KCSiE, as follows:

“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).”

- 4.8. There may be particular issues for small schools to consider in these circumstances, as there may not be a parallel class for the child alleged to have caused harm to move into, or space for the child to easily be separated from the child alleged to have been harmed. 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 in so doing.
- 4.9. Similar challenges may exist in certain year groups e.g., if a Year 10 option group has only one class, then creative sustainable solutions will need to be identified.
- 4.10. If the incident met the threshold for a strategy meeting, then SLES Safeguarding should have been invited and should already be involved. If there was no strategy meeting, then the school should still contact SLES Safeguarding for support with formulating a SRRP and identifying other possible sources of support.

- 4.11. Where necessary SLES Safeguarding can support the school to arrange a multi-agency professionals' meeting so that relevant agencies can share information and assessments; discuss concerns and levels of risk and review and agree the SRRP.
- 4.12. A multiagency meeting might be necessary for those cases where the school are finding it challenging to manage the situation, such as where the allegation is known within the wider community.
- 4.13. Likely Multi-agency meeting attendees: SLES, ESBAS, SWIFT, CSC, LA information governance team, Communications Team, Police, probation service. These agencies will attend depending on the individual circumstances of the case.
- 4.14. The Education Support Behaviour and Attendance Service (ESBAS) are available (01273 481967, 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 that both the child alleged to have caused harm and the child who was harmed 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 child alleged to have caused harm to be educated off-site for a period of time. ESBAS can advise on how Governors can make these arrangements with the parent and carers.
- 4.15. One aim of the multi-agency meeting is to consider the evidence of the risks the child may pose (including the nature of the risks and to whom); devise and review SRRPs to ensure any potential contact between the child alleged to have caused harm and the child who was harmed 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 caused harm; 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 or herself to stop the behaviour and to return to a healthy trajectory.

5. Support for children involved

- 5.1. It is recognised in KCSiE 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, a child who has been harmed may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.
- 5.2. It is essential that all children who have been harmed 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 should not be downplayed and should be treated equally seriously. A child should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a child ever be made to feel ashamed for making a report or their experience minimised.
- 5.3. Staff need to keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity 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 was.

- 5.4. A child who has been harmed may feel unsafe and may struggle in a normal classroom environment due to their experiences. While schools should avoid any action that would have the effect of isolating the child, in particular from supportive peer groups, there may be times when the child 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 child wants to, not because it makes it easier to manage the situation. If required, schools should provide a physical space for children to withdraw. It may be necessary for schools to maintain arrangements to protect and support the child who was harmed for a long time. Schools should be prepared for this and should work with children's social care and other agencies as required.
- 5.5. Whilst they should be given all the necessary support to remain in their school, if the trauma results in the child who was harmed being unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the child who was harmed (and following discussion with their parents or carers). It is important that if the child does move to another school (for any reason), that the new school is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens (and should discuss with the child and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the safeguarding file.
- 5.6. The school should offer ongoing support to all the children who have been involved including the child alleged to have caused harm. 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. KCSiE acknowledges that in these instances schools will have a 'difficult balancing act' in managing the needs of all children and young people involved.
- 5.7. Considerations of support as well as consequences 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 behaviour 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.

6. Contact with parents

- 6.1. At the outset of an incident, there may be temporary limitations to speaking with parents, until it is established with the police or social care that it is safe and appropriate to do so.
- 6.2. Beyond any initial limitations, throughout the rest of the process the school should maintain open communication with the parents of all the children who have been involved (both children who have been harmed and caused harm) to ensure any concerns are identified as quickly as possible.
- 6.3. See [Appendix 2](#) for additional guidance on communicating with parents.

7. Data protection

- 7.1. It is important that schools consider data protection when managing an incident of child-on-child 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.
- 7.2. Having good records management processes are always important 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

7.3. The importance of good, clear child protection record keeping is identified as essential practice within statutory guidance for schools. KCSiE 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.

- 7.4. More guidance around Data Protection can be purchased as a traded service through [Services2Schools](#).

8. Communications

- 8.1. 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 the school's reputation. Sensitive situations present real communication challenges but these must be anticipated and addressed.
- 8.2. 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.
- 8.3. 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.
- 8.4. Schools can and should seek 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 4](#).

9. Future planning and longer-term considerations

- 9.1. 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.

- 9.2. **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 or setting must where possible, at least 3 months prior to transition to a new school or 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 or young person's harmful sexual behaviour.
 - Compliance with rules or 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).
- 9.3. If the DSL of the current school identifies any concerns in relation to ongoing risk, then they should update the SRRP and ensure that there is a distinct handover of the case to the DSL of the receiving school.
- 9.4. If there are other agencies involved with the case at the time of transition, then they should be consulted, to inform the update to the SRRP, and where necessary convened within a multiagency meeting.
- 9.5. 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.
- 9.6. 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.

- 9.7. 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 or children involved. As such, when a child transitions to another school or setting, it may bring them into contact with the other child or 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 or her previous behaviour. It will therefore be important that the DSL of the receiving school considers 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 or her parents and carers to help inform a plan to improve the child’s sense of safety whilst at school.
- 9.8. 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.
- 9.9. 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 and 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 - Reporting to the police in the case of incidents involving sexual offences and harmful sexual behaviour

Schools and colleges should also refer to local safeguarding protocols, alongside [Keeping children safe in education](#).

This guidance outlines the factors which school or college leaders should consider when deciding to involve the police. These considerations would inform whether the police would expect and need to be involved. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing.

Rape, assault by penetration, sexual assaults and causing someone to engage in sexual activity without consent¹ are crimes.

Where a report of rape or assault by penetration is made, this should be referred to the police straight away, (calling 999, in an emergency dial 999 this should be used if: There is a risk to life or risk of serious injury, or a serious crime is in progress or about to happen. Any member of staff witnessing such an incident should be empowered to dial 999 as they will be able to give the most accurate account of the incident.).

All other non-emergency incidents should be reported using 101 or [online reporting methods](#). The call will be logged by an operator and depending on the nature of the incident the appropriate response made.

¹ (1) Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: she or he intentionally penetrates the vagina or anus of another person (B) with a part of her or his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: she or he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE - Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom, breasts or genitalia without consent, can still constitute sexual assault).

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: she or he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE - this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).



Where a report has been made to the police, the school or college should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity. At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college is supporting the child in any decision they take. This should be with the support of local authority children's social care and any appropriate specialist agencies. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

When we reference sexual behaviour or offences here, we do so in the context of child-on-child. If incidents are adult on child, then this should be reported to the police.

Incidents of harmful sexual behaviour or offences

The seriousness of the incident will be a judgement call for the school or college. In making this decision the level of harm and the circumstances leading to the incident would need to be carefully considered. Ideally the decision as to whether the school or college deal with an incident internally or pass it over to the police needs to be made at the initial stage, by gathering only enough information to establish the facts of the case.

- What has happened?
- Who is involved?
- What is the history of the individual and between those involved?
- Are there any safeguarding concerns?

Any aggravating factors which contribute to making the incident and subsequent level of harm more serious would be relevant in deciding on whether to involve the police.



- What is the impact on the victim?
- Is there a significant age gap between the individuals involved? Both the ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child.
- Any power imbalance between the children. For example, is or are the alleged perpetrator(s) significantly older, more mature, more confident and well-known social standing? Does the victim have a disability or learning difficulty?
- Is the alleged incident a one-off or a sustained pattern of behaviour? Is there evidence that the behaviour is escalating? Or previous incidents of a similar nature? Sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
- Sexual violence and sexual harassment taking place within intimate personal relationships between children?
- Are there ongoing risks to the victim, other children, adult students or school or college staff?
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation?
- Are there any on-line elements?

When the decision is made to report an incident to the police for investigation, due to the seriousness of the incident or for other aggravating circumstances, the school or college should cease their own investigation, having asked only enough questions to establish the basic facts of the incident. Every effort should be made by the school or college to preserve any relevant evidence. Initial enquiries undertaken by the school or college should be fully documented as they may be required if the matter goes to court. This includes recording questions asked to young people and their replies. Where a crime is reported to the police, it will be recorded as a crime and an investigation will commence.



Sexual harassment or Harmful Sexual Behaviour

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school or college. Some of these behaviours may be criminal offences.

When we reference sexual harassment here, we do so in the context of child-on-child sexual harassment. If incidents are adult on child, then this should be reported to the police.

Sexual harassment is likely to: violate a child’s dignity, and make them feel intimidated, degraded, humiliated or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual “jokes” or taunting
- Physical behaviour, such as: grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts, deliberately brushing against someone, interfering with someone’s clothes. Schools and colleges should be considering when any of this crosses a line into a sexual assault- it is important to talk to and consider the experience of the victim.
- Displaying pictures, photos or drawings of a sexual nature
- Up skirting is a criminal offence, The Voyeurism (Offences) Act 2019 which amends the Sexual Offences Act 2003 to make up skirting a specific offence of voyeurism. The Act came into force on 12 April 2019.
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and sexual violence. It may include:
 - Consensual and non-consensual sharing of nude and semi-nude images or videos, or both. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides



detailed advice for schools and colleges. Taking and sharing nude photographs of U18s is a criminal offence.

- o Sharing of unwanted explicit content
- o Sexualised online bullying
- o Unwanted sexual comments and messages, including, on social media
- o Sexual exploitation; coercion and threats, and
- o Coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. When making the decision on whether to involve the police think about the aggravating factors which contribute to making the incident and subsequent level of harm more serious than you are not able to deal with inside your behaviour policy.

Appendix 2 - Suggested scripts for headteachers and DSLs to use when communicating with parents after an incident of alleged child on child harmful sexual behaviour has occurred

Prior to exploring the alleged concerns with the parents and 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 and carers. Explain to the parents and 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 and carers of the child who displayed the alleged behaviour

Be clear about what has been alleged or observed:

Be specific about what has been alleged so the parents and 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 and 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 and 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 or 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 or her to Children’s Services”

“Due to your child being assessed as posing a risk, we are required to refer him or 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 or 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 text which can be used).

“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”

Using these types of response will help the parents and 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 or investigate the concerns?

For children aged ten 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 ten working days.”

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

“I or (Mr or 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 ten working days.”

For children under ten

“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 ten working days.”

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

“I or (Mr or 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 ten 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 or 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 or 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 or 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 ten 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 and carers of the child(ren) who was or were targeted by the alleged behaviour

Be clear about what has been alleged or 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 and carers to feel that their child has been listened to.

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

The parents and 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 SRRP will support the reduction of risk:

“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 lunchtimes 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 or investigate the concerns?

For children aged ten 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 ten working days."

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

"I or (Mr or 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 ten working days."

For children under ten

"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 ten working days.”

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

“I or (Mr or 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 ten 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 3 - information for parents on what happens following an incident of harmful sexual behaviour

1. How the school should respond to an incident of harmful sexual behaviour
 - 1.1. 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 caused the harm, react when questioned about their behaviour?
 - How does the child who has been harmed respond or 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 displaying the harmful sexual behaviour to alternative activities?
 - Background information regarding the children involved (family support, any known behavioural concerns).
 - 1.2. 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.

- 1.3. 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.
- 1.4. If possible, the school should make the parents of all the children who have been involved aware of the concerns the same day staff discovered the harmful sexual behaviour. 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). 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, irrespective of whether they have been harmed or caused harm, 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 or 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](#) - 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.
- [Childline](#) - Provide free and confidential advice for children and young people.
- [Internet Watch Foundation](#) 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](#): 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 4 - Key communications challenges and 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 Communications Team.

Appendix 5 - Safeguarding Risk Reduction Plan (SRRP)

1. What is a Safeguarding Risk Reduction Plan

- 1.1. An SRRP is required when a child presents a serious safeguarding risk - to themselves, or to other children or members of the school community. Sometimes there will have been a serious incident arising from a child's behaviour in or outside of school. 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 child on child and this is building a picture of increasing risk that has not responded to lower-level interventions.
- 1.2. The SRRP is 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 promoted by ESBAS. This may also be cross referenced with the SLES SRRP.
- 1.3. 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 and carers and, where agreed appropriate, the child.
- 1.4. The school 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.

- 1.5. 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.
- 1.6. 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.
- 1.7. A risk plan created at any single point in a child's education is not necessarily a long-term indicator of risk.
- 1.8. 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 school 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 or other children or both; 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 schools must exercise judgement.

3. Using the plan

- It is possible that the school may be formulating a plan with just the parents and the child involved.
- The plan could also 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 or 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 and 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, then they should all have their own individual SRRP.
- The Headteacher and the Designated Safeguarding Lead should be involved in the development and implementation of the plan within the school.
- 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 child-on-child harmful sexual behaviour coming to light.
- 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 focussed on addressing the risks and providing appropriate support:

- What are the alleged or reported harmful sexual behaviours?
- Is there any evidence of what may be causing the harmful sexual behaviour?
- Who is he or 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:

Potential contact with the child targeted

- Does the child who was harmed appear afraid of the child who caused the harm?
- What are the views of the child who was harmed by the behaviour in relation to contact?
- How does the child who allegedly caused the harm present? Do they appear remorseful or is there evidence to indicate ongoing pre-occupation with the child who was harmed?
- Is there any evidence of hostility or aggression from any of the children involved?
- A child who has experienced child on child harmful sexual behaviour may find it distressing being in close proximity to the child who harmed them. 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 harmed to lead as normal routine as possible without fear of coming into contact with the child who caused the harm.
- 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 was harmed and the child who caused the harm. This will enable the child who was harmed to be alert to any behaviour or actions which may not have been part of the agreed SRRP.

Small schools

- 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 and 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) and is not an indicator of guilt or blame.
- In some cases, due to the ongoing level of risk from the child who caused harm 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 4.11 of the main guidance and contact ESBAS.

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.

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 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 and carers).

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?

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 do 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).

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 or outside community as a result of the alleged or reported harmful sexual behaviour?
- How will the child travel to or from school and what times will they arrive and leave school?

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?

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 inappropriately 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,’ ‘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 enable professionals to identify concerns more quickly.

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 and carers should be made aware of any staff or other professionals who have been made aware.

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 and carers of what action they would need to take to ensure the child could take part in the activity safely.

Support for the child or young person

- Does the child have a clear understanding of the expectations of the school in terms of his or 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 or 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.

5. Reviewing the SRRP

5.1. Due to the changes in a child's development, level of understanding and circumstances it is vital to review the safety plan on a regular basis to ensure that the plan is proportionate to the level of risk identified and takes into account any progress that the child may have made in addressing the risks. It is not acceptable for a SRRP to be left without review, as this could lead to either risks not being identified and managed accordingly or to a child's development being harmed through restrictions which become punitive.

- Initially the SRRP should be reviewed at a high frequency (e.g., daily then weekly) should be checked on a daily then weekly basis, that said, make sure all parties are advised of future weekly, monthly or termly review dates so they can feed into the process.
- Where changes are made that reduce restrictions, ensure that this is done incrementally, and that monitoring continues.
- Any changes to the SRRP should be communicated to all key professionals, parents and carers and the child (and the child who has been harmed if they attend the same school).
- Opportunities should be provided to each child involved to report how they find the SRRP through the allocation of a trusted adult in the school, who can check in with the child about what is and is not working in respect of the safety plan.

- 5.2. Children who display harmful sexual behaviour should be supported to return to normal school routines. The child's progress should be regularly reviewed to establish what evidence of risk reduction there has been and how the child is working to prevent any further incidents of harmful sexual behaviour. This may include reviewing their compliance with the safety plan and the engagement of both the child and their parents with any intervention work offered. Similarly, it is important to monitor the wellbeing and progress of the child who has been harmed.

- 5.3. Whenever the child is subject to increased levels of supervision, this is difficult to sustain in the longer-term and can impact a child's self-esteem and ability to experience healthy social interactions with others. Furthermore, higher levels of supervision often place the responsibility for managing the behaviour and identified risks with adults supporting the child 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. Children are able to make positive changes to their behaviour and with support and guidance, the risk of further harmful sexual behaviour occurring can reduce. As such, it is important to ensure the SRRP is regularly reviewed.

6. Assessing whether a SRRP can be ended

- 6.1. In deciding when a SRRP can be ended, the DSL should review the school's safeguarding records, alongside speaking to the child's parents and carers and any key professionals supporting the child (this may include class teachers and any external agencies supporting the child (e.g., Social Worker or Youth Offending worker). In addition, the child(ren) who have been harmed should be consulted to ascertain their views and wishes.

- 6.2. The following questions should be considered when assessing if it is safe to end a safety plan:

- What does the child say about their previous behaviour? Do they recognise why it was harmful? In many cases, children may deny or minimise their harmful sexual behaviour, this is generally to do with feelings of shame and fear of being judged. The ending of a plan should not necessarily be prevented due to a child denying or minimising the harmful sexual behaviour, as long as there are no other concerns in relation to the child's current behaviour and engagement with the safety plan. However, there should be caution in adjusting the safety plan in the event that the child who has harmed continues to express any harmful attitudes towards the child who has been harmed or any other child.
- How has the child responded to the safety plan? Has the child been compliant and responded to instructions?
- Has the child engaged in any intervention to address the harmful behaviour? What evidence is there that the child is utilising any key skills or knowledge taught during the intervention? Have the child's parents supported intervention?
- What is known about the child's current behaviour in school, at home and in the community? Is there any evidence of risky behaviour which may raise concerns about potential further harmful sexual behaviour occurring?
- Are there any concerns in the child's environment (home or community) that may be undermining their engagement with the safety plan and intervention?
- Does the child continue to display any attitudes or behaviours towards the child(ren) who was or were harmed that are concerning?
- What are the views of the child who has been harmed?

- Would there be any potential risks to the child who harmed, in the event that the safety plan is ended (e.g., is it possible the child might be targeted by peers?)
 - Are the child's parents supportive of the SRRP ending?
- 6.3. If any concerns remain to the questions above, then it may not be appropriate to end the SRRP fully but to maintain the plan with any additional measures which are considered proportionate to the assessed level of risk.
- 6.4. If it is assessed that a SRRP is no longer needed, it may be appropriate to have a time-limited period where the child trials attending school without a safety plan, which can then be reviewed. This will enable the child's progress and behaviour to be monitored. This period of review can include outlining to the child who has harmed and his or her or their parents the school's expectations and what may happen if there are any behaviours of concern in future (e.g., safety plan being re-introduced), as well as offer an opportunity, where appropriate to offer recognition of the child's progress.

Appendix 6 - Safeguarding Risk Reduction Plan (SRRP)

[School Name] School-based Safeguarding Risk Reduction Plan

Date:

Detail required	Child's Details
Name	
Date of Birth or age	
Class and Year Group	

Adults included in the development of the plan

Name	Relationship and contact

Details of decision regarding parent and carer or pupil involvement
<i>If not included in meeting specify why and how their views and wishes are conveyed.</i>
Specify any issues of SEN, Child Protection, Race, Culture or Diversity
Reason for risk management plan:
<i>(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.)</i> <i>Example: was there a specific incident, escalating behaviour, history</i>
Timescales
<i>Duration of plan, review dates and any additional specifics.</i>
Date plan to start:
<i>Insert date</i>
Please add any supplementary details relevant to this plan:
<i>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)</i>
Give details of any known strategies or precautions required to avoid, manage or predict the behaviour or risks and specific triggers to be avoided

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

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

Please give details: i.e., knows 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)

Insert name and logo of school

Risk Management Action Plan for	<i>Insert name of child</i>
Date of plan	<i>Insert date</i>
Distributed to	<i>List all people to receive a copy of the plan</i>
Lead professional	<i>Lead professional's name</i>
Contact details	<i>Lead professional's contact details</i>
Review date	<i>Insert date</i>

Risk Detail	Action	Person responsible	Contingency plan
<i>Example: Child A has previously opportunistically touched another student when queueing</i>	<i>Example: Child A to be placed at the front of any queue until next review date</i>	<i>Example: All staff to be advised by DSL</i>	<i>Example: Should Child A not comply with the plan; this is to be immediately reported to the DSL for review</i>

Date risk assessment and plan agreed	Name and role in school	Signature
<i>Date</i>	<i>Name - Headteacher</i>	
<i>Date</i>	<i>Name - Designated Safeguarding Lead</i>	