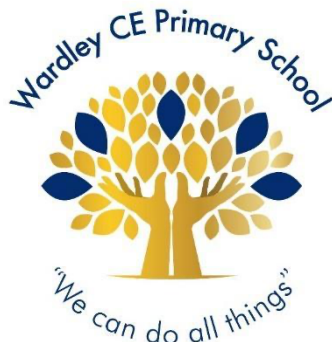




Name of Reviewer	Helen Kelly
Date of Approval of Governing Body	October 2026
Signature of Chair	Alan Johns
Signature of Head	Helen Kelly
Date Due for Review	October 2027

EQUALITY STATEMENT

As a school we welcome our duties under the Equality Act 2010. The general duties are to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations

We review all policies and procedures to ensure there are no unlawful or unjustified negative equality impacts. In doing so, we have due regard to the protected characteristics in the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We recognise that the application of particular protected characteristics within school education is determined by the provisions of the Act. If you believe this policy may have a negative equality impact, or you require it in an alternative format, please contact the school office.

Our School Vision

We are a Church of England school that values and recognises the uniqueness of each individual child and acknowledges their fundamental right to be educated to their full potential in a safe, secure and caring environment. Our ethos is built on Christian foundations and drives our belief that we can do all things.

Wardley CE Primary School is committed to continual improvement to ensure that what we do today is even better tomorrow. We provide a happy, secure and supportive learning environment where the children develop independence and work hard to make the most of their talents, and that 'We can do all things' within a deep and rich curriculum.

We can do all things through Christ who strengthens us. Philippians 4:13

Practical ways in which we attempt to carry out our school vision

Through the Christian value of respect:

- Having strong ethics to underpin our decision making and actions.
- Creating an environment which promotes the Christian ethos of trust, respect and honesty to enable people to flourish.
- Promoting a sense of justice.
- Creating a strong moral purpose which underpins everything we do

Through the Christian value of friendship:

- Having an inclusive ethos to create a school in which everyone is welcome and everyone is equal.
- In celebrating diversity we value the strengths of all and embrace differences.
- Engaging stakeholders within and beyond the school.

Through the Christian value of trust:

- Having a strong sense of teamwork amongst all members of the school community.
- No matter how small, we value every contribution and support each other to reach our goals.
- In respecting each other, we strive to not let each other down.
- In feeling valued and empowered people have a desire to go the extra mile.

Through the Christian value of courage

- Recognising, supporting and developing everyone's potential.
- Nurturing skills and promoting opportunities.
- Creating an environment for people to think positively and take risks.

Through the Christian value of perseverance:

- Through continual enhancement we are constantly striving to achieve high standards, we never stand still.
- All improvements are underpinned with high aspirations.
- When problems arise, we must hold on to our vision and find solutions.
- We inspire and innovate and we support others to do the same.

Policy Introduction

This policy should be read alongside the school's Safeguarding and Child Protection Policy, Behaviour Policy, Anti-Bullying Policy, Online Safety Policy and any school procedures relating to harmful sexual behaviour, sexual harassment and sexual violence. Where there is any conflict, current statutory safeguarding guidance and local safeguarding procedures take precedence.

Keeping Children Safe in Education (KCSIE) 2026, Part Two, paragraphs 192–193 (pages 51–52), requires governing bodies and proprietors to ensure that the child protection policy includes clear arrangements for child-on-child abuse, including:

- procedures to minimise the risk of child-on-child abuse.
- the systems in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously.
- how allegations of child-on-child abuse will be recorded, investigated, and dealt with.
- clear processes as to how victims, perpetrators and any other child affected by child-on-child abuse will be supported.
- a recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.
- a statement making clear that there is a zero-tolerance approach to abuse and that it must never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys', as this can contribute to unacceptable behaviour, misogyny and an unsafe environment for children.
- recognition that, for some (but not all) forms of child-on-child abuse, girls are more likely to be victims and boys more likely to be perpetrators, while making clear that all child-on-child abuse is unacceptable and will be taken seriously; and
- the different forms child-on-child abuse can take, such as:
 - bullying, including cyberbullying, prejudice-based and discriminatory bullying.
 - discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents; and abuse in intimate personal relationships between children (also known as teenage relationship abuse).
 - physical abuse, including hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm; physical assault or harm, or threats of harm involving a weapon.
 - harmful sexual behaviour (HSB), sexual violence and sexual harassment, which may include misogyny or misandry. Part Five of KCSIE 2026 sets out the approach schools should take to reports of this nature.
 - sexual harassment, including sexual comments, remarks, jokes, unwanted sexualised behaviour and online sexual harassment, whether standalone or part of a broader pattern of abuse.

- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- consensual and non-consensual making or sharing of nudes and semi-nudes, including images altered or generated using artificial intelligence (AI). All such incidents require a safeguarding response, although the response should be proportionate to the circumstances.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

KCSIE 2026 also recognises that some children may face additional barriers to recognising or reporting abuse. This includes children with SEND and other vulnerabilities, who may be disproportionately affected by bullying or abuse and may show no obvious outward signs. Staff must maintain professional curiosity and ensure communication needs are considered when enabling children to report concerns.

This policy forms part of the school's wider safeguarding arrangements and should be read as an annex to the Safeguarding and Child Protection Policy. It provides additional detail because child-on-child abuse can involve complex, sensitive and overlapping safeguarding issues.

At Wardley CE Primary School, we are committed to the prevention, early identification and appropriate management of child-on-child abuse. All concerns will be taken seriously and responded to promptly, proportionately and consistently, with the best interests, safety and welfare of all children at the centre of decision-making.

This policy applies to governors and all members of staff including volunteers.

Definition

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms.

Child-on-child abuse is abuse of a child by another child or children. It may be physical, sexual, emotional or financial, and may include coercive or controlling behaviour. It can occur within intimate and non-intimate relationships, friendships and wider peer associations, and can take place inside or outside school and online.

All staff will be aware that children can abuse other children and that it can happen both inside and outside of school and online. All staff will understand, that even if there are no reports in the school it does not mean it is not happening; it may be the case that it is just not being reported. As such if staff have any concerns regarding

child-on-child abuse, they will speak to their designated safeguarding lead (or deputy).

All staff understand the importance of challenging inappropriate behaviour between children. Sexual harassment, misogyny, misandry, discriminatory behaviour and other harmful conduct must not be dismissed as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Failing to challenge such behaviour can normalise abuse, create an unsafe culture and make children less likely to report concerns.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues. Child-on-child abuse may occur online, face to face, or concurrently in both environments. Online abuse may include abusive, harassing, misogynistic or misandrist messages; sexualised online bullying; coercion or threats; sharing unwanted explicit content; and the consensual or non-consensual making or sharing of nudes and semi-nudes, including imagery altered or generated using AI.

Behaviour between children exists on a continuum. Not every incident of conflict, bullying or developmentally inappropriate behaviour will amount to abuse, but any incident may raise safeguarding concerns. Decisions will be made on a case-by-case basis by the DSL or deputy, using professional judgement and considering the nature of the behaviour, age and developmental stage of the children, power imbalance, repetition, coercion, intent, vulnerability, impact and wider context.

Where one child causes harm to another, staff must not minimise the behaviour or assume it is simply conflict or bullying. The DSL or deputy will consider whether the behaviour is abusive or harmful and what safeguarding response is required. Concern will arise where:

- There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about coercion, exploitation, intent, the use or threat of a weapon, sexual harm, discriminatory abuse, or risk to other children.

Where there is evidence of an intention to cause serious harm, or where the behaviour is sexual, coercive, exploitative, discriminatory or otherwise presents a safeguarding risk, it will be treated as a safeguarding concern whether serious physical injury occurred.

Vulnerabilities

The school recognises that any child can experience child-on-child abuse. Factors that may increase vulnerability or create barriers to disclosure include:

- Individual and situation factors can increase a child's vulnerabilities to abuse by their peers such as the sharing of an image or photograph
- Children who are socially isolated from their peers
- Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse

- Children with certain characteristics such as sexual orientation, ethnicity, race, or religious beliefs
- Children with SEND and/or disabilities, who may face additional barriers to disclosure and are disproportionately vulnerable to abuse; children with communication needs; and children affected by prejudice, discrimination, social isolation or other contextual risks.

Prevention

As a school we will minimise the risk of allegations against other pupils by:-

- In line with the revised statutory Relationships Education, Relationships and Sex Education (RSE) and Health Education guidance in force from 1 September 2026, providing a developmentally appropriate curriculum which teaches healthy and respectful relationships, boundaries, consent and kindness, stereotyping and prejudice, how to recognise and report abuse, sexual harassment and sexual violence, and age-appropriate online harms.
- Providing a robust, age-appropriate online safety curriculum which develops pupils' knowledge and skills to recognise risk, seek help and behave safely and respectfully online, including in relation to online bullying, harmful content, image sharing, AI-generated/deepfake content and coercion.
- Having robust structures for raising parental awareness of on-line safety and parental controls, particularly when children are using information technology at home
- Maintaining appropriate filtering and monitoring systems in line with KCSIE 2026 and the Department for Education filtering and monitoring standards, reviewing provision at least annually and ensuring systems do not unreasonably restrict teaching and learning.
- Maintaining well-promoted, easily understood and accessible systems through which any pupil can report a concern, knowing that they will be listened to, taken seriously, supported and kept safe. Children will never be made to feel that they are creating a problem by reporting abuse or be shamed for making a report.
- Delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk
- Developing robust risk assessments & providing targeted work for pupils identified as being a potential risk to other pupils
- Creating a safe culture in school by implementing policies and procedures that address child-on-child abuse and harmful attitudes, promoting healthy relationships and attitudes to gender and sexuality

Allegations against other pupils which are safeguarding issues

Allegations or concerns about the behaviour of one child towards another may constitute a safeguarding concern. This may include physical or emotional abuse, harmful sexual behaviour, sexual harassment or sexual violence, abuse in intimate relationships, exploitation, discriminatory abuse, bullying or cyberbullying, and the

making or sharing of nudes and semi-nudes. The DSL or deputy will consider the circumstances on a case-by-case basis.

The allegation: -

- Is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other pupils in the school
- Indicates that other pupils may have been affected by this student
- Indicates that young people outside the school may be affected by this student

Examples of safeguarding issues against a pupil could include:

Sexual Violence and Sexual Harassment

Sexual Violence

Children can, and sometimes do, abuse other children in a sexually violent way. For the purposes of this policy, sexual violence refers to specific sexual offences under the Sexual Offences Act 2003, as reflected in KCSIE 2026.

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: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/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: s/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

Physical Abuse

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally, before considering the action or sanctions to be undertaken.

Sexual Harassment

Child-on-child Sexual Harassment is unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

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: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos, or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos.
 - sexualised online bullying.
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats

Bullying

Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious, lasting problems.

In order to be considered bullying, the behaviour must be aggressive and include:

- An Imbalance of Power: Young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- Repetition: Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e. g. size, hair colour, race, gender, sexual orientation, and excluding someone from a group on purpose.

Cyberbullying and online abuse

Cyberbullying and online abuse can occur through messaging services, social media, gaming, group chats, email and other digital platforms. Depending on the circumstances, online behaviour may also constitute a criminal offence. School will not make blanket assumptions about criminality or automatic police involvement based solely on a child’s age. The DSL or deputy will assess each case, seek advice from the Bridge Partnership and/or police where appropriate, and follow KCSIE 2026 and local safeguarding procedures.

Making or sharing nudes and semi-nudes, including AI-generated imagery

This includes nude or semi-nude images, videos or live streams created, altered or generated by or involving a person under 18. The school will follow the UK Council for

Internet Safety (UKCIS) 'Sharing nudes and semi-nudes' guidance (updated March 2024) and KCSIE 2026.

All incidents involving the making or sharing of nudes and semi-nudes will be treated as safeguarding concerns. Staff must report the matter immediately to the DSL or deputy and must not view, copy, print, forward, store or ask a child to download or share the imagery. The DSL will make a proportionate assessment, considering age, development, consent, coercion, exploitation, vulnerability and risk. The law exists to protect children; children should not be unnecessarily criminalised.

Emotional Abuse

Can include blackmail or extortion and may also include threats and intimidation. This harmful behaviour can have a significant impact on the mental health and emotional well-being of the victim and can lead to self-harm.

Sexual Abuse and Harmful Sexual Behaviour

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse. It can also include indecent exposure, indecent touching /serious sexual assaults or forcing others to watch pornography or take part in sexting.

Abuse in intimate personal relationships between children

Abuse can occur in intimate personal relationships between children and may include physical, sexual, emotional or controlling/coercive behaviour, stalking, harassment, threats or online abuse. Although this may be more commonly associated with older children, staff should remain alert to developmentally inappropriate or harmful relationship behaviours at any age and respond through safeguarding procedures.

Sexual Exploitation

This can include encouraging other young people to engage in inappropriate sexual behaviour or grooming and recruiting members of the peer group into being sexually exploited by other young people or adults. It can also include photographing or videoing other children performing indecent acts.

Initiation/hazing type violence and rituals.

This can include rituals that young people accept they are going to have to endure in order to be accepted within a group or organisation. These rituals are often violent and/or sexually abusive.

Identifying a child who is being abused by their peers

The school will recognise that the signs that a child may be suffering from child-on-child abuse can also overlap with signs indicating other types of abuse and can include:

- failing to attend school, disengaging from classes, or struggling to carry out school related tasks to the standard ordinarily expected,
- physical injuries,
- experiencing difficulties with mental health and/or emotional wellbeing,
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much,
- broader changes in behaviour including alcohol or substance misuse,
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age
- abusive behaviour towards others

Abuse affects children very differently. The above list is not exhaustive, and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on the context of their circumstances.

Where a child exhibits any behaviour that is out of character or abnormal for his/her age, the school will consider whether an underlying concern is contributing to their behaviour including, whether the child is being harmed or abused by their peers).

Relevant legislation and statutory/non-statutory guidance

This policy has been reviewed against the legal and safeguarding framework in force in England in September 2026, including:

- Keeping Children Safe in Education 2026 (DfE) – statutory guidance, in force from 1 September 2026.
- Working Together to Safeguard Children 2026 (DfE) – statutory guidance, updated 18 March 2026.
- Relationships Education, Relationships and Sex Education (RSE) and Health Education – revised statutory guidance in force from 1 September 2026.
- Equality Act 2010 and the Public Sector Equality Duty.
- Children Act 1989 and Children Act 2004; Education Act 2002, section 175; Sexual Offences Act 2003; Voyeurism (Offences) Act 2019; and relevant data protection legislation.
- UKCIS, Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024).
- Salford Safeguarding Children Partnership and Bridge Partnership local referral procedures.

Procedure for Dealing with Allegations of Child-on-Child Abuse

When a child reports, witnesses or is involved in a child-on-child incident, staff must consider whether there is a safeguarding concern and must report concerns promptly to the DSL or deputy. Staff should not wait for a child to make a direct disclosure where behaviour or other information gives cause for concern.

- The member of staff will listen carefully and respectfully, reassure the child that they are being taken seriously, avoid blame or shame, use the child's own

language where possible, ask only open-ended questions needed to clarify the concern, and never promise confidentiality.

- The school and the Designated Safeguarding Lead will also take account of the wider context in which the alleged incident(s) of child-on-child abuse took place, for example the physical environment of the school; route/travel to and from school; online environment and gender norms
- A factual written record must be made as soon as possible, recording what the child has said without interpretation or personal opinion. Staff must not conduct their own investigation. The DSL or deputy must be informed as soon as practically possible.
- The DSL or deputy will assess the concern and decide the appropriate response. This may include managing the matter internally with safeguarding and pastoral support, accessing universal services or community-based Early Help, making a referral to the Bridge Partnership/local authority children's social care, and/or reporting to the police. Decisions will be made case by case in line with KCSIE 2026, Working Together to Safeguard Children 2026 and Salford safeguarding procedures.
- Where a crime may have been committed, the DSL or deputy will consider reporting to the police and will liaise with local authority children's social care as appropriate. For serious sexual offences, the starting principle is that a police referral should be made; this applies even where an alleged perpetrator is under the age of criminal responsibility, when police will take a welfare rather than criminal justice approach.
- Parents/carers will normally be informed at an appropriate stage. However, they will not be informed where doing so may place a child at increased risk, prejudice an investigation, or conflict with advice from children's social care or police. Where external agencies are involved, the DSL will agree with them how and when parents/carers should be informed.
- The DSL will ensure that all concerns, discussions, decisions, actions and the rationale for decisions are recorded securely in the school's safeguarding recording system, in accordance with the school's record-keeping and data protection arrangements.
- Behaviour and disciplinary action may be taken in line with the school's Behaviour Policy, but safeguarding considerations will take priority. Any sanction will be proportionate and will not replace the need to support and safeguard the child who has experienced harm, the child alleged to have caused harm, and any other affected children.
- Following a report of sexual violence, the DSL or deputy will complete an immediate risk and needs assessment. For sexual harassment and other child-on-child abuse, the need for a risk assessment will be considered case by case. Assessments will consider the safety and support needs of the child who has experienced harm, the alleged perpetrator(s), other potential victims, the wider school community, and the location/context of the incident.
- Risk and needs assessments and any safety/supervision plans will be recorded, regularly reviewed and updated as circumstances change. Immediate safeguarding action will not be delayed while referrals or investigations are underway.
- Where a concern involves nudes or semi-nudes, staff will follow UKCIS guidance. Staff must not view or forward illegal images of a child. The DSL will

decide whether a device should be confiscated to preserve evidence, whether police or the Bridge Partnership should be contacted, and whether specialist reporting/removal services are required. In exceptional circumstances only, the DSL may decide that viewing an image is unavoidable for safeguarding purposes, in accordance with UKCIS guidance.