NORWICH SCHOOL

Child-on-Child Abuse Policy

This policy is reviewed by Education Committee annually. This policy was last reviewed and agreed on Michaelmas 2026. It is due for review in Michaelmas 2027.

Confirmed by:

Dee Willmott	Governor	Michaelmas 2026
Anthony Little	Governor	Michaelmas 2026

Version Control

Version number	Date issued	Author/key contact	Change(s) summary
1.0	Trinity 2022	Nicky Fairweather	
2.0	Trinity 2022	Nicky Fairweather	Updates to include Zero Tolerance and sharing of nudes and semi-nudes.
2.1	Trinity 2025	Nicky Fairweather	See Appendix 1 – Summary of Changes
2.2	Michaelmas 2026	Nicky Fairweather	See Appendix 1 – Summary of Changes

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General principles

The governors, senior leadership team, and all staff at Norwich School are committed to the prevention and appropriate management of child-on-child abuse.

It is essential that all concerns and allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our environment and the pupils involved.

This policy

This policy is the school's overarching policy for any issue that could constitute child-on-child abuse. It relates to, and should be read alongside, the Safeguarding and Child Protection Policy, the Anti-Bullying Policy, the Behaviour, Sanctions and Intervention Policy and the Exclusions Policy.

For best practice the pastoral and safeguarding teams refer to the following document from Farrer & Co which was used to create this policy: www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/addressing-child-on-child-abuse.pdf

What do we mean by Zero Tolerance?

We adopt the following principles from the UN Women's definition of zero tolerance with respect to harassment, as follows:

- "At the heart of zero tolerance practice is the certainty that the organisation will never do nothing in response to knowledge of [child-on-child abuse], will always support those who report, and will proactively ensure that equality and non-discrimination inform its work.

- Zero tolerance in practice requires taking all allegations seriously. It does not mean that the same actions will always be taken if a report is upheld; instead, there should be a range of options with proportionality being a principle in determining consequences.

- Zero tolerance means that leadership will make it possible and safe for anyone, no matter their position or contractual status, to be active in shaping a climate where [child-on-child abuse] is never ignored, minimised or excused. Where claims to zero tolerance sit alongside an absence of action, lived experiences undermine the value of the claim…

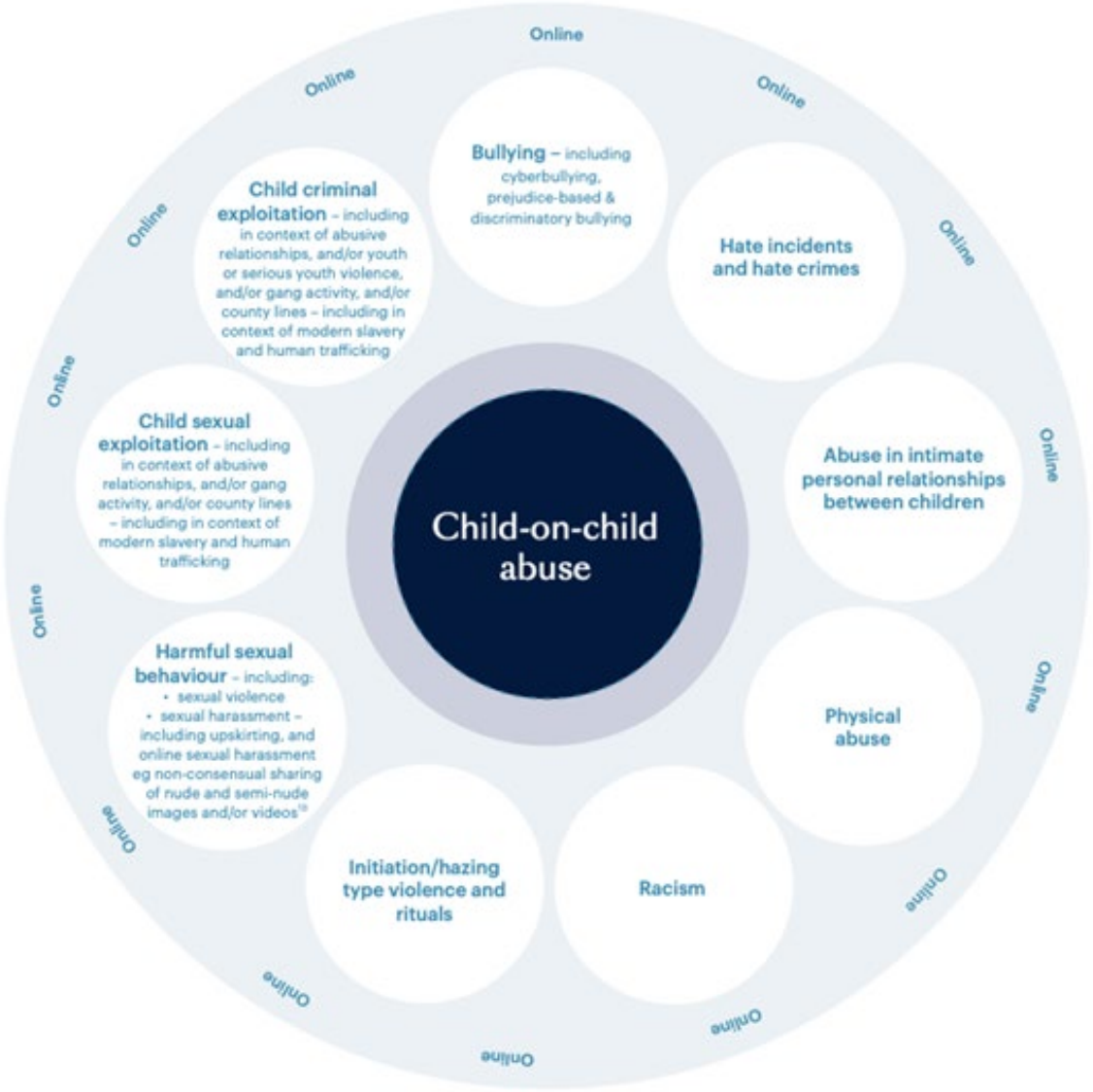
- Contradictory signals risk damaging the reputation, internal and external, of the organisation and the belief of the staff or students concerned, that here is serious intent to change culture."

- In short, zero-tolerance means taking a proportionate and appropriate response to every alleged incident. It does not necessarily mean the use of sanctions in all cases, and where sanctions may be considered, we must ensure that they do not disproportionately impact racially minoritised pupils, those with disabilities and those already known to local authority children's social care.

What is child-on-child abuse?

For these purposes, child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children, and within children's relationships (both intimate and non-intimate), friendships and wider peer associations.

Child-on-child abuse can take various forms, including (but not limited to): serious bullying, relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and / or prejudice-based violence including, but not limited to, gender-based violence. Examples of online peer-on-peer abuse would include youth produced sexual imagery, online abuse, peer-on-peer grooming, the distribution of youth involved sexualised content, and harassment



It is critical to be aware of the role that inequality and discrimination can play in child-on-child abuse. Socio-economic inequality can increase bullying, and racial

and ethnic minority status can be a risk factor for victimisation by peers. Children from minoritised groups are at much higher risk for poor health and behavioural outcomes as a result of discriminatory bullying. LGBTQ children may also be at greater risk of abusive behaviour from their peers.

How prevalent is child-on-child abuse?

Research suggests that child-on-child abuse is one of the most common forms of abuse affecting children in the UK.

When does behaviour become problematic or abusive?

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it. The school refers to the Simon Hackett continuum model and can speak with the Harmful Sexual Behaviours Team where appropriate.

Behaviour will be assessed considering whether it:

- is socially acceptable,
- involves a single incident or has occurred over a period of time,
- is socially acceptable within the peer group,
- is problematic and concerning,
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability,
- involves an element of coercion or pre-planning,
- involves a power imbalance between the child / children allegedly responsible for the behaviour and the child / children allegedly the subject of that power, and
- involves a misuse of power.

Sharing nudes and semi-nudes

The (non-statutory) Sharing nudes and semi nudes: advice for education settings working with children and young people, produced by the UK Council for Internet Safety (UKCIS) Education Group, outlines how to respond to an incident of nudes and semi-nudes being shared, and states that:

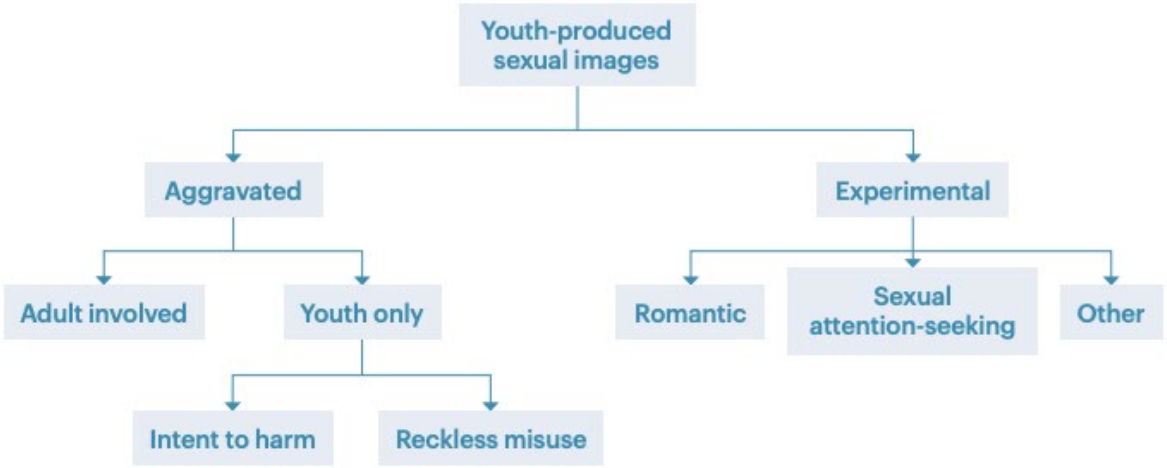
"The types of incidents which this advice covers are:

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18 This advice does not cover:
- the sharing of nudes and semi-nudes of under 18s by adults (18 and over) as this constitutes child sexual abuse and education settings should always inform their local police force as a matter of urgency

- children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images

The UKCIS guidance explains, in terms of:

- "Understanding motivations and behaviours: Nudes and semi-nudes can be shared by, and between, children and young people under a wide range of circumstances and are often not sexually or criminally motivated. An education setting's response to an incident will differ depending on the motivations behind the incident and the appropriateness of the child or young person's behaviour. In order to ensure an appropriate and proportionate response to an incident of nudes and semi-nudes being shared, education settings can use the tools set out below"; and
- "Defining the incident: Finkelhor and Wolak's typology of youth-produced imagery cases (below) can be used to define and assess incidents according to motivations.



There has been an increase in the use of AI tools to create child sexual abuse material globally. In such instances the school will follow best practice in response, refering to relevant guidance from external agencies. A useful guide has been provided by the National Crime Agency, CEOP and the Internet Watch Foundation here.

- "Where an under 18 is creating AI-CSAM, they may think it is 'just a joke' or 'banter' or do so with the intention of blackmailing or harming another child. They may or may not recognise the illegality or the serious, lasting impact their actions can have on the victim."

How can a child who is being abused by their peers be identified?

All staff should be alert to the wellbeing of students and to signs of abuse. All concerns should be logged using the online reporting system, which is monitored by the Pastoral and Safeguarding Teams. These staff will engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse.

School environment

The school actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

- educating all governors, its senior leadership team, staff, students, and parents about this issue.
- educating children about the nature and prevalence of child-on-child abuse, the safe use of social media, and the facts about consent. Pupils are reminded what to do if they witness or experience abuse. They are regularly informed about the school's approach to such issues.
- supporting the on-going welfare of pupils.
- working with governors, senior leadership team, and all staff, students and parents to
- address equity issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the community.
- creating conditions in which our students can aspire to, and realise, safe and healthy relationships.
- responding to cases of child-on-child abuse promptly and appropriately.
- ensuring that all child-on-child abuse issues are fed back to the school's Safeguarding Team.

Any response should:

- Include a thorough investigation of the concern or allegation. Depending on the nature and seriousness of the alleged incident, it may be appropriate for the police to carry out this investigation.
- Treat all pupils involved as being at potential risk. The school should ensure that a safeguarding response is in place for both the pupil who has allegedly experienced the abuse, and the pupil who has allegedly been responsible for it (and additional sanctioning work may be required for the latter).
- Consider:
    - The abuse may indicate wider safeguarding concerns for the pupils involved (family, social and peer groups, outside school, online) that may require mitigation measures.
    - The potential complexity of child-on-child abuse, considering the interplay between power, choice and consent.
    - The views of the pupils affected - unless it is considered unsafe to do so, the DSL should discuss the proposed action with pupils and their parents and obtain consent to any referral before it is made. The school should manage pupil expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.
    - The wishes of any pupil who has allegedly been abused, and to give that pupil as much control as is reasonably possible over decisions regarding how any investigation will be progressed, and how they will be supported.

What should you do if you suspect either that a pupil may be at risk of or experiencing abuse by their peers, or that a pupil may be at risk of abusing or maybe abusing peers?

- If a member of staff thinks that a pupil may be at risk of or experiencing abuse by peers, or that a pupil may be at risk of abusing or maybe abusing peers, they should discuss their concern with the DSL.
- Where a pupil is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately.
- Referrals on behalf of the school will be made by the DSL or a DDSL.
- If a pupil discloses experiences / concerns, the member of staff should listen to the child, using open language that demonstrates understanding rather than judgement.

How will the school respond to concerns or allegations of child-on-child abuse?

- The DSL will discuss the concern or allegation with members of the safeguarding team, and / the Head, and take any immediate steps to ensure the safety of the pupil affected.
- Any investigation meetings should be held by the DSL, or a DDSL, and another member of the safeguarding / pastoral team. Time and space must be protected for any investigation meeting to take place in an unhurried manner.
- Where any concern or allegation indicate that indecent images of a child may have been shared online, the DSL should consider what urgent action can be taken in addition, to seek specialist help (via the police) in preventing the images spreading further and removing the images from the internet.
- DSLs should use their professional judgement to:

  (a) assess the nature and seriousness of the alleged behaviour and

  (b) determine whether it is appropriate for the alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required.
- In borderline cases the DSL may wish to consult with children's services locally on a no-names basis to determine the most appropriate response.
- Where the DSL considers or suspects that the alleged behaviour might be abusive or violent, the DSL should contact children's social care and / or the police as soon as possible. The DSL will discuss the concern or allegation with the agency and agree on a course of action, which may include:

  A: Manage internally with help from external specialists where appropriate and possible. Where the alleged behaviour between children is abusive or violent (as opposed to inappropriate or problematic – unless as stated above), scenarios B, C or D should ordinarily apply.

  B: Contribute to an inter-agency assessment, with targeted early help services provided to address the assessed needs of the pupil and their family. These

services may include a specialist harmful sexual behaviour team, CAMHS and/or youth offending services.

C: Refer the pupil to children's social care for a section 17/47 statutory assessment.

D: Report alleged criminal behaviour to the police. Alleged criminal behaviour will ordinarily be reported to the police, however, there are some circumstances where it may not be appropriate to report. For example, where the exchange of youth involved sexual imagery does not involve any aggravating factors.

N.B. All concerns or allegations will be assessed on a case-by-case basis, considering wider context.

Risk Assessment and Safety Plans

The school will always carry out a risk assessment and may create a safety plan in respect of:

- any pupil who is alleged to have behaved in a way that is considered abusive or violent,
- any pupil who has reportedly been abused or affected by this behaviour by another child, or
- any pupil who may be at risk due to the alleged behaviour by another pupil as deemed appropriate by the DSL.

Where it is alleged that a pupil has behaved in a way that is considered inappropriate or problematic (as opposed to abusive or violent), the DSL will use their professional judgment to determine whether it would be appropriate to contact children's social care, and to carry out a safety plan.

Careful judgment and consideration are required as to whether alleged behaviour which might be judged to be inappropriate by an adult might be harmful to another child. Consultation is recommended with children's social care if there is any doubt about this. Consideration should be given to a range of factors, including context, severity of the alleged behaviour, impact of the alleged behaviour on others, risk to others, and whether there are any patterns of behaviour occurring.

Where other pupils have been identified as witnesses to alleged abuse or violence, consideration should also be given by the DSL to whether there might be any risks to those pupils, and whether a safety plan would be appropriate in relation to any risks presenting to them.

Information sharing, data protection and record keeping

When responding to a concern or allegation of child-on-child abuse, the school will:

- Consider, in consultation with children's social care, the police and other relevant agencies, how to share information about the concern or allegation with the pupil affected, their parents, staff, and other students and individuals.

- Record the information that is necessary for the school and other relevant agencies to respond to the concern or allegation and safeguard everyone involved.
- Keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose.
- Be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in Working Together to Safeguard Children 2026 and the HM Government advice on Information Sharing (updated in September 2026).

Disciplinary action

The school may wish to consider whether disciplinary action is appropriate for any pupil involved in child-on-child abuse. If there are police proceedings underway (or there could be) it is critical that the school works in partnership with the police and/or children's social care.

Where a matter is not of interest to the police and/or children's social care, the school may still need to consider what is the most appropriate action to take.

Disciplinary action may sometimes be appropriate, including:

(a) to ensure that the pupil takes responsibility for and realises the seriousness of their behaviour;

(b) to demonstrate to the pupil and others that child-on-child abuse can never be tolerated; and

(c) to ensure the safety and wellbeing of other pupils.

However, these considerations must be balanced against any police investigations, the pupil's potential unmet needs, and any action or intervention planned regarding safeguarding concerns.

Before deciding on appropriate action, the school will always consider its duty to safeguard all pupils in its care from harm; the underlying reasons for a pupil's behaviour; any unmet needs, or harm or abuse suffered by the pupil; the risk that the pupil may pose to others; and the severity of the child-on-child abuse and the causes of it.

The school will, where appropriate, consider the potential benefit, as well as challenge, of using exclusion as a response.

Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other pupils in the school. In the event of school transfer, consideration must be given to sharing information with the receiving school regarding child-on-child abuse to allow best protection of pupils in the new school.

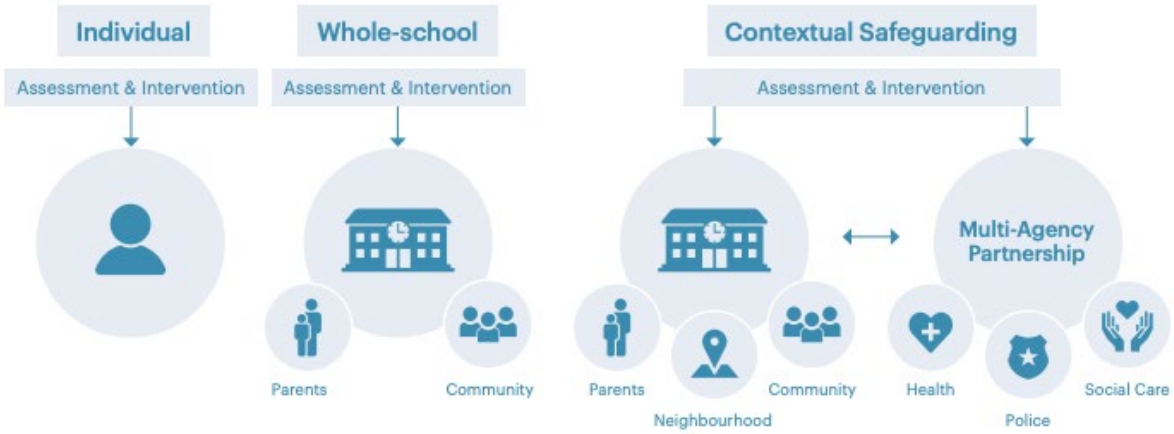
Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the school will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards.

On-going proactive work for a whole-school community Contextual Safeguarding approach

The school's response to concerns or allegations of child-on-child abuse should be part of on-going proactive work to embed best practice, and in taking a whole-school community Contextual Safeguarding approach to such abuse. As such the school's response can become part of its wider prevention work.

This response may involve the school undertaking a Contextual Safeguarding school assessment. Asking questions such as those listed below to develop a plan moving forward.

- What protective factors and influences exist (such as positive peer influences, examples where child-on-child abuse has been challenged, etc.) and how can these be bolstered?
- How did the physical environment or the pupils' routes to and from the school contribute to the abuse, and how can these be addressed?
- How did the online environment contribute, and how can the school mitigate this?
- Did wider gender norms, equality issues, and/or societal attitudes contribute?
- What was the relationship between abuse and the cultural norms between staff and pupils?
- Does the abuse indicate a need for staff training?
- How have similar cases been managed in the past and what effect has this had?
- Does the case highlight areas for development in raising awareness / preventing child-on-child abuse, in the Pupil Personal Development (PPD) curriculum etc.?
- Are there any lessons to be learnt about the way in which the school engages with parents to address issues?
- Are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?
- Does this case highlight a need to work with individual pupils to build confidence, and teach them how to identify and manage abusive behaviour?
- Were there opportunities to intervene earlier or differently?


Individual
Assessment & Intervention
Whole-school
Assessment & Intervention
Parents
Community
Contextual Safeguarding
Assessment & Intervention
Multi-Agency Partnership
Parents
Neighbourhood
Community
Health
Police
Social Care

Document control

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External documents referenced:	Children Act 1989 HM Government: Information Sharing 2026 Simon Hackett Continuum Model Working Together to Safeguard Children 2026 www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/addressing-child-on-child-abuse.pdf Sharing nudes and semi nudes: advice for education settings working with children and young people Child Sexual Abuse Material Generated by AI: An essential guide for professionals who work with children and young people

APPENDIX 1 – ANNUAL UPDATE SUMMARY: Michaelmas 2026

Version number	Date issued	Author/key contact	Changes	Page
2.1	Trinity 2025	Nicky Fairweather	Sharing of nudes and semi-nudes Addition of information on Artificial Intelligence	6
			Section re-named to 'Risk Assessment and Safety Plans'	9
2.2	Michaelmas 2026	Nicky Fairweather	Update to current legislation dates on page 10 and in document control	10