ANTI-BULLYING POLICY (Including: Peer-on-Peer Abuse and Sexual Violence and Sexual Harassment, between Children in Schools)

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RGS Worcester
Anti-Bullying Policy
(Including: Peer-on-Peer Abuse and Sexual Violence and Sexual Harassment, between Children in Schools)

Aim of this policy

Our aim is for every pupil to be able to attend school in safety and free from humiliation, oppression and abuse so they can learn in a relaxed, supportive, caring and secure environment.

The school's duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports many other policies including, but not limited to Safeguarding Children Policy, Rewards, Behaviour and Sanctions Policy, Exclusions Policy, Special Educational Needs and Disabilities Policy, Sex and Relationships Policy, Images Use of School Computers and Internet Access and adheres to the statutory guidance Keeping Children Safe in Education issued by the Department of Education and updated September 2019 and 2020. It is accepted that when undertaking development or planning of any kind the school will consider safeguarding matters as part of this process. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002; and in line with government publications the Teachers' Standards 2012, 'Working Together to Safeguard Children' 2018 and 'Keeping Children Safe in Education' September 2019 and 2020 and in accordance with the Prevent duty guidance (March 2015 and revised July 2015).

There are TWO Appendices that form part of this policy, and they can be found at the end of the policy. Appendix 2 is: Peer-on-Peer Abuse and Sexual Violence and Sexual Harassment between Children in Schools.

Objectives of this policy

- To ensure that all governors, members of staff, pupils and parents understand what bullying is, what the school policy on bullying is and follow it when a suspected case of bullying is reported.
- To ensure that every allegation of bullying is taken seriously for it can cause physical and psychological damage, even leading to suicide.
- To ensure that members of the school support each other by reporting all instances of bullying.
- To ensure that all members of the school are aware that we take bullying seriously and that it will not be tolerated.

Definition

The school views bullying to be the wilful and conscious desire to hurt, frighten or threaten another person or group, usually repeated over a period of time. It includes encouraging and manipulating others to bully. It may be overt and intimidatory but is often hidden and subtle. It may occur directly or through cyber-technology (social websites, mobile phones, text messages, sexting, photographs or e-mail). This includes peer on peer abuse.

Please note that further advice about sexting in schools is available from the UK Council for Child Internet Safety (UKCCIS): 'Sexting in Schools and Colleges'.
https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis

The School will not tolerate the use of the term 'banter' to in any way excuse what it deems to be inappropriate references to any person or persons. Please be aware that our Safeguarding Policy addresses peer on peer abuse and this should be read in conjunction with this Anti-Bullying Policy.

Bullying can be and includes for the purpose of this Policy:

- Emotional   Being unfriendly, excluding, tormenting (e.g. hiding books, threatening gestures).
- Physical   Pushing, kicking, hitting, punching or any use of violence, threatening or obscene gestures.
- Racial   Using racial taunts, graffiti, gestures because of someone's colour and/or origin.
- Sexual/Sexist   Unwanted physical contact or sexually abusive comments because of gender.
- Verbal   Insults, sarcasm, spreading rumours, teasing and name-calling including comments made against particular groups for example because of disability, Special Educational Needs or on grounds of religion, cultural background, gender, sexual orientation or transgender status.
- Cyber   All areas of internet, such as email & internet chat room misuse, social network sites, threats by text messaging & telephone calls, and misuse of photographic technology, e.g. cameras and videos. This includes sexting or threatening and/or blackmailing a person to share images of that person or purporting to be that person or connected with them in some way.
- Religious   Unkind words or actions because of someone's religion.
- SEN/D   Unkindness because of physical or mental disabilities or having Special Educational Needs.
- Homophobic   Treating someone unkindly because people think that they are or might be homosexual.
- Family related   Unkindness because a child is adopted or is a carer, or the like.

Impact of bullying
Bullying results in pain and distress to the victim. Bullying is serious as it can make the lives of its victims a misery. It undermines their confidence and self-esteem and can destroy their sense of security. Bullying impacts upon its victims' attendance and attainment at school, marginalises those groups who may be targeted and can have life-long psychological damage. At worst, bullying can be a factor in pupil suicide.

It is acknowledged that bullies have complex reasons for their behaviour and may need help. The consequences of the bullies being allowed 'to get away with it' can be detrimental to them as well as to their victim. All pupils deserve the right to be helped to understand what acceptable behaviour is.

Bullying and the law

- Under the Children Act 1989 a bullying incident should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer from, significant harm'. The normal procedures should then be followed in this matter. This applies to all forms of bullying, including racist incidents and a single serious incident or repeated incident may lead to consideration under child protection procedures. A log of incidents of bullying and of racist incidents is maintained in school.
- The Equality Act 2010 replaces previous anti-discrimination laws. A key provision is a new public sector Equality Duty, which came into force on 5 April 2011. It replaces the three previous public sector equality duties for race, disability and gender, and covers age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Duty has three aims. It requires public bodies to have due regard to the need to:
  - o eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the act;
  - o advance equality of opportunity between people who share a protected characteristic and people who do not share it;
  - o foster good relations between people who share a protected characteristic and people who do not share it.
  - o Part 6 of the Act makes it unlawful for the responsible body of a school to discriminate against, harass or victimise a pupil or potential pupil in relation to admissions, the way it provides education for pupils, provision of pupil access to any benefit, facility or service, or by excluding a pupil or subjecting them to any other detriment. In England and Wales Part 6 of the Act applies to maintained schools and Academies and to other independent schools.
- Section 89(5) of the Education Inspections Act 2006 (updated 2011) gives head teachers the power to regulate pupils' conduct when they are not on school premises and are not under the lawful control or charge of a member of staff. This can relate to bullying incidents occurring anywhere off the school premises.
- Although bullying is not a specific criminal offence, it is important to bear in mind that some types of harassing or threatening behaviour or communications could be considered a criminal offence, for example under the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003 and the Public Order Act 1986 (updated – Criminal Justice & Public Order Act 1994). For example, under the Malicious Communication Act 1988, it is an offence for a person to send an electronic communication to another person with the intent to cause distress or anxiety or to send an electronic communication which conveys a message which is indecent or grossly offensive, a threat, or information which is false and known or believed to be false by the sender.
- There are also criminal laws which apply to assault.

Procedure for dealing with an incident of bullying

What to look for

Pupils who are bullied may show changes in behaviour, such as becoming shy or nervous, feigning illness, becoming aggressive, taking unusual absences or clinging to adults. There may be evidence of changes in work and concentration patterns.

All members of the community must be alert to the signs of bullying and act promptly and firmly against it, in accordance with school policy.

Surveys have shown that in most bullying incidents, most people knew that what was going on was wrong.

<u>What to do</u>

The Assistant Head (Pastoral) below refers to the Assistant Head (Pastoral) of RGS, the Headmaster of RGS The Grange and the Head of RGS Springfield. The Assistant Head (Pastoral) at the Senior School and the Headmaster at RGS The Grange are also the DSL (Designated Safeguarding Lead). At RGS Springfield the Headmistress will inform the DSL for RGS Springfield.

If you are the victim:

- If you feel able to, confront the bully by verbally making him/her aware that you think that what he/she is doing is wrong.
- Share your feelings with someone else.
- If possible talk to a member of staff, your Class Teacher, your Tutor, your Assistant Head of Year, Head of Year or Assistant Head (Pastoral) or the Nurse about the incident. If you would rather not go straight to a member of staff, talk to your friends or to senior pupils. They may well be able to advise on an appropriate course of action, or will be able to involve other people who can. There are also people outside the School who would be willing to help, for example Childline: 0800 1111 and Samaritans: 116 123.

If you are a pupil who witnesses bullying behaviour:

- Support the victim by offering your friendship and make it clear that in your opinion what is happening to them is wrong.
- Encourage them to speak out on their own behalf by confronting the bully, or with their permission, confront the bully yourself.
- Accompany the victim to a trusted adult, or suggest that you see the Assistant Head (Pastoral), Head of Section, Assistant Head of Year, Head of Year, Tutor or Class Teacher on their behalf.

If you are a member of Staff who witnesses bullying behaviour or it is reported to you:

- Sometimes people, either through lethargy, peer group pressure, or tacit support for what was going on, fail to take action. This must not happen.
- Reassure and support the pupils involved.
- Advise them that you are required to pass details on to the relevant member of the pastoral team. (Class Teacher, Form Tutor, Assistant Head of Year, Head of Year, Head of Section, Assistant Head (Pastoral)).
- Inform an appropriate member of the pastoral team as soon as possible. This member of staff must record all incidents of reported bullying and ensure that the Assistant Head (Pastoral) is informed. The Assistant Head (Pastoral) will keep a central log of all

complaints or incidences of bullying and record the way in which they were dealt with.

What will happen

- The victim will be interviewed by their Class Teacher, Form Tutor, Assistant Head of Year, Head of Year, Head of Section or Assistant Head (Pastoral) on their own, and asked to describe and write an immediate account of events. The process for dealing with bullying will be explained clearly to them.
- The victim will also be given the opportunity to discuss his own reactions and behaviour towards the bully.
- Once the Class Teacher, Form Tutor, Assistant Head of Year, Head of Year,Head of Section or Assistant Head (Pastoral) are clear that a bullying offence has been committed, the bully and any others involved will be interviewed individually and asked to write an immediate account of events. The process for dealing with bullying will be explained clearly to them.
- Support and advice will be given as appropriate to all pupils involved.
- Details of the incident will be recorded on all the pupils' files until they are 21 years old using the Bullying Incident Form, Appendix 1. The Assistant Head (Pastoral) is copied in so that it can be recorded as a bullying incident.
- Parents of all pupils involved will be contacted and a meeting may be arranged if deemed appropriate by the Assistant Head (Pastoral).
- A review will be undertaken after each incident logged as a bullying incident to determine whether or not a pattern can be identified and to evaluate the effectiveness of the approach adopted.
- If it is decided that it is not to be labelled a bullying incident the matter will be dealt with under the School's Rewards, Behaviour and Sanctions Policy.
- The Assistant Head of Year, Head of Year, Head of Section, Assistant Head or Senior Deputy Head will monitor the situation.

Punishment

- A suitable sanction will be given in accordance with the school's Rewards, Behaviour and Sanctions Policy. If there is a disclosure about peer on peer abuse all of the children involved, whether perpetrator or victim, will be treated as being 'at risk' – please see section on peer on peer abuse below. Although these sanctions will vary with the seriousness and the length of the offences but suspension and exclusion will be employed if deemed appropriate in cases of severe and persistent bullying.
- In very serious cases it may be necessary to make a report to the Police or Social Services. However, it is the policy of the School to attempt to resolve such issues internally using our own disciplinary sanctions, unless the matter is of such gravity that a criminal prosecution is likely.

What can we do to prevent bullying at RGS Worcester?

As a school community we will not allow cases of bullying to go unreported but will speak up, even at risk to ourselves.

This requires staff to:

- be positive role models in word and action at all times

- be observant of signs of distress or suspected incidents of bullying
- make efforts to remove occasions for bullying by active patrolling during supervision duty
- take steps to help victims and remove sources of distress without placing the victim at further risk
- not encourage retaliation

This requires pupils to:

- refuse to be involved in any bullying situation.
- if appropriate, take some preventative action if present when bullying occurs OR
- report the incident or suspected incident to any member of staff and thereby help break down the code of secrecy

This requires the school to:

- inform parents that it will not tolerate bullying
- take a positive approach to educating students to combat bullying
- recognise that both the bullied and the bullies need appropriate support
- raise the awareness of staff about bullying via training and ensure all members of staff are aware of the policy and procedures, especially with regard to the monitoring of any strategies put in place
- take any action that is reasonable to reduce the risk of bullying at times and places where it is most likely
- use PSHCE lessons, assemblies, drama, stories, literature, historical events, current affairs and so on to explore the nature of bullying, the reasons it might occur and to suggest strategies for dealing with it
- the key points from this policy will be displayed in the school's calendar
- to dovetail the Anti-Bullying Policy with the school's Rewards, Behaviour and Sanctions Policy

The School recommends that parents of anyone being bullied should:

- watch for signs of distress in their child
- take an active interest in their child's social life and acquaintances
- advise their child to tell a member of staff about the incident. If possible allow students to report and deal with the problem themselves for much respect and confidence can be gained from this course of action
- inform the School if bullying is suspected
- not encourage retaliation
- be willing to attend interviews at the School if their child has been involved in any bullying incidents

The School recommends that parents of bullies should:

- discuss the issues with their child
- be willing to attend school for discussions
- join with the school in any measures which are taken to resolve the matter

<u>Review</u>

The policy and procedure will be reviewed annually by the Assistant Head (Pastoral) and Heads of RGS Dodderhill, RGS The Grange and RGS Springfield. A brief report will be given annually to the Governors in the Trinity Term.

References and Sources of Information

Behaviour and Discipline in Schools and the Independent Review of Behaviour in Schools.

Gov.uk resources:
Bullying at School; Guidance: Preventing Bullying documents:-
● Preventing and Tackling Bullying (July 2017);
● Approaches to preventing and tackling bullying: case studies (June 2018);
● Cyber Bullying: advice for Headteachers and school staff (2013, last updated 2017) which includes supplementary advice for parents for tackling on-line bullying https://www.saferinternet.org.uk/advice-centre/parents-and-carers/safety-tools-social-networks-and-other-online-services
● Supporting children and young people who are bullied: advice for schools.
Make Them Go Away dfe.takeonedigital.co.uk (You Tube)
Let's Fight it Together at digizen.org (You Tube)
Legislative links:
Schools' duty to promote good behaviour (Education and Inspections Act 2006 Section 89)
Power to tackle poor behaviour outside school (Education and Inspections Act 2006 Section 89(5))
The Equality Act 2010 and the new public sector Equality Duty, April 2011, Part 6.

Specialist Organisations:
The Diana Award: Established by the British Government in 1999, the organisations mission is to foster, develop and inspire positive change in the lives of young people. In February 2020, RGS Senior School hosted the Diana Anti-Bullying Ambassador Training Programme, which saw trainers work with our pupils and those from nine other school across the UK to change attitudes surrounding bullying. We are committed to supporting our Ambassadors in implementing various initiatives to further promote an awareness of the impact of bullying behaviour in our community and engender an ethos of intolerance to all types of bullying behaviour.
The Anti-Bullying Alliance (ABA): Founded in 2002 by NSPCC and National Children's Bureau, the Anti-Bullying Alliance (ABA) brings together over 100 organisations into one network to develop and share good practice across the whole range of bullying issues. http://www.anti-bullyingalliance.org.uk
Family Lives: A organisation devoted to transforming the lives of families, supporting parents and making happier relationships, happier families and a stronger society. https://www.familylives.org.uk/
Kidscape: Charity established to prevent bullying and promote child protection. Advice for young people, professionals and parents about different types of bullying and how to tackle it. They also offer specialist training and support for school staff, and assertiveness training for young people. (www.kidscape.org.uk)
Restorative Justice Council: Includes best practice guidance for practitioners 2011.
Cyberbullying:
ChildNet International: Specialist resources for young people to raise awareness of online

safety and how to protect themselves. (www.childnet.com and www.thinkuknow.co.uk)

LGBT: http://www.bullying.co.uk/general-advice/what-is-homophobic-bullying/

EACH: A training agency for employers and organisations seeking to tackle discrimination on the grounds of gender and sexual orientation.
https://each.education/education-training-consultancy-services

Schools Out: Offers practical advice, resources (including lesson plans) and training to schools on LGBT equality in education.
http://www.schools-out.org.uk/

Stonewall: An LGBT equality organisation with considerable expertise in LGBT bullying in schools, a dedicated youth site, resources for schools, and specialist training for teachers.
(www.stonewall.org.uk)

SEN/D:

Mencap: The voice of learning disability and represents people with learning disabilities, with specific advice and information for people who work with children and young people.
(www.mencap.org.uk)

Serious Youth Violence – Home Office 'This is abuse campaign for schools': SYV Link

New youth produced imagery guidance; New Youth Link

Sponsor – Assistant Head (Pastoral)

June 2011

Reviewed and Endorsed: September 2012, August 2013, May 2014, August 2015, August 2016, August 2017, October 2017, December 2017, May 2018, August 2018, August 2019 and August 2020

APPENDIX 1

BULLYING INCIDENT FORM			
1.	Name of person(s) bullied		
2.	Name of person(s) accused		
3.	Date of incident		Time of incident	
4.	Place of incident		
5.	Name of Witnesses		
6.	Nature of incident		
7.	Recommended Action		
8.	Report of discussions with parents		
9.	DSL (Designed Safeguarding Lead)		

Parts 1-8 to be completed by the Class Teacher/Form Tutor and/or Head of Year and passed to the DSL. The completed form will be placed in the victim's and bully's file(s) until the former is 25 years old.

APPENDIX 2
Peer-on-Peer Abuse, Including Sexual Violence and Sexual Harassment, between Children in Schools

This section of the policy is:

- compliant with the statutory guidance on peer-on-peer abuse as set out in Keeping Children Safe in Education (September 2019 and 2020) and should, if relevant according to the concerns/allegations raised, be read in conjunction with the DfE's advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE's Advice) (December, 2017, Updated May 2018), and any other advice and guidance referred to within it, as appropriate;
- should be read in conjunction with the Local Safeguarding Children Board's (LSCB) Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.
- should be read in conjunction with other School policies, in particular, but not limited to: The Safeguarding Children Policy and the Rewards, Behaviour and Sanctions policy.

I The School's Responsibilities

All Governors, Staff and volunteers are committed to the prevention, early identification and appropriate management of peer-on-peer abuse (as defined below) both within and beyond the School. In particular, we believe that in order to protect children, we will:

1. be aware of the level and nature of risk to which our pupils are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context; and
2. take a contextual whole-school approach to preventing and responding to any peer-on-peer abuse;
3. We will not merely take a reactive approach to peer-on-peer abuse in response to alleged incidents of it. We recognise national and increasing concern about this issue, and wish to implement the strategies detailed in this policy in order to ensure that our pupils are safe;
4. We encourage parents to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any of their peers, they should inform the School so that it can ensure that appropriate and prompt action is taken in response.

We will conduct a review, at least annually, of this policy and in particular this aspect of our safeguarding provision and we will involve pupils and staff in the consultation to inform the review and produce a risk assessment for our setting. A number of staff and pupils will be involved in each annual review, which involves and is informed by an assessment of the impact and effectiveness of this policy over the previous year.

The School will not use the term 'victim' and/or 'perpetrator' in relation to incidents of peer-on-peer abuse. This is because our School takes a safeguarding approach to all individuals involved in allegations of or concerns about peer-on-peer abuse, including those who are alleged to have been abused and those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter.

Research has shown that many children who present with harmful behaviour towards others, in the context of peer-on-peer abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers.

Although we use the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18. We have nonetheless chosen not to restrict our approach to peer-on-peer abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all pupils in our care, regardless of age.

The school is aware that although the starting point is that the School's response to peer-on-peer abuse should be the same for all pupils, regardless of age, there may be some additional considerations in relation to a pupil aged 18 or over in terms of how local agencies and/or

II Understanding peer-on-peer abuse

What is peer-on-peer abuse?
For these purposes, peer-on-peer 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)
(Reference: Firmin, C. 2017. Abuse Between Young People: A Contextual Account. Oxon: Routledge, December 2017).

We recognise that peer-on-peer abuse can take various forms, including: serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence. These types of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, sexual bullying in schools and other settings can result in the sexual exploitation of children by their peers. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to peer-on-peer abuse therefore needs to consider the range of possible types of peer-on-peer abuse set out above and capture the full context of children's experiences. This can be done by adopting a Contextual Safeguarding approach and by ensuring that our response to incidents of peer-on-peer abuse takes into account any potential complexity.

What is Contextual Safeguarding?
This policy encapsulates a Contextual Safeguarding approach, which:
• is an approach to safeguarding children that recognises their experiences of significant harm in extra-familial contexts, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities;
• recognises that as children enter adolescence, they spend increasing amounts of time outside of the home in public environments (including on the internet) within which they may experience abuse; and
• considers interventions to change the systems or social conditions of the environments in which abuse has occurred. For example, rather than move a child from a school,

professionals could work with the school leadership and student body to challenge harmful, gendered school cultures, thus improving the pre-existing school environment.

How prevalent is peer-on-peer abuse?
Research suggests that peer-on-peer abuse is one of the most common forms of abuse affecting children in the UK. The abuse includes but is not limited to psychological, physical, sexual, financial and emotional. This is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or children (under the age of 18) into sexual activity
(a) in exchange for something the child/children need(s) or want(s), and/or
(b) for the financial advantage or increased status of the individual responsible for/facilitating the abuse.
The child/children may have been sexually exploited even if the sexual activity appears consensual and can occur through the use of technology.
This is any sexual behaviour by a child or child which is outside of developmentally "normative" parameters. This can (but does not always) include abusive behaviour such as sexual assaults.
The term "gender-based violence" refers to violence that is directed against one gender as a result of their gender or that affects one gender disproportionately.

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.
Sexual behaviours - as the NSPCC explains "children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour. As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage.

The continuum model proposed by Simon Hackett (Durham University, 2016) when seeking to understand pupil behaviour can be useful for staff:

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected Socially acceptable Consensual, mutual, reciprocal Shared decision making	Single instances of inappropriate sexual behaviour Socially acceptable behaviour within peer group Context for behaviour may be inappropriate Generally consensual and reciprocal	Problematic and concerning behaviour Developmentally unusual and socially unexpected No overt elements of victimisation Consent issues may be unclear May lack reciprocity or equal power May include levels of compulsivity	Victimising intent or outcome Includes misuse of power Coercion and force to ensure compliance Intrusive Informed consent lacking or not able to be freely given May include elements of expressive violence	Physically violent sexual abuse Highly intrusive Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour Sadism

Staff may also find it useful to consult the Brook Traffic Light Tool when considering potential sexual behaviours by children.

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hacket's continuum model to assess where the alleged behaviour falls on the spectrum and to then decide on an appropriate response. This could include, for example, 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
• involves a misuse of power

It should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider in response to other alleged behaviour involving reports of other types of abuse. For example, the issue of consent and the nuances around it, is unlikely to apply in the same way in cases where the alleged behaviour is reported to involve emotional and/or physical abuse, as it could in cases of alleged sexual behaviour which is reported to involve harmful sexual behaviour.

In addition, the School could be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional, physical behaviour and digital behaviour.

It should also be recognised that the same behaviour presented by different children may be understood at different points on a spectrum, depending on the particular context. For example, an incident involving youth produced sexual imagery may be inappropriate in one context, for example, when exchanged between two children in a consenting relationship, and abusive in another, for example, when it is (a) shared without the consent of the child in the image; (b) produced as a result of coercion; or (c) used to pressure the child into engaging in other sexual behaviours.

Behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital, and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies. For example, a physical fight between two children may not constitute peer-on-peer abuse where the fight is a one-off incident, but may be abusive where the child's/children's behaviour subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership – including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child.

The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual pupil basis, but could also apply across the pupil body. Behaviour

generally considered inappropriate may in fact indicate emerging concerning behaviour to which schools need to take a whole-school approach in order to prevent escalation. For example, where multiple boys are making inappropriate comments about girls, one-off sanctions are unlikely to be effective and wider actions should be considered, such as arranging for an external person to deliver a year group intervention exercise; revising the School's PSHCE programme; and/or a discussion around whether anything is happening within the wider community that might be affecting the pupils' behaviour.

It will also be important to consider the wider context in which the alleged behaviour is reported to have occurred, and which may trigger the need for a referral. For example, some behaviour that is considered inappropriate may be capable of being dealt with internally. However, if there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject of the concern(s)/allegation(s) is considered or suspected by the DSL to constitute peer-on-peer abuse, the School will follow the procedures set out below.

How can a child who is being abused by their peers be identified?
All staff should be alert to the well-being of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ. Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse (please see Appendix 2 of the Safeguarding Children Policy for indicators 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 by no means 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 their particular circumstances. Rather than checking behaviour against a list, staff should be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents so that the cause(s) of their behaviour can be investigated.

Are some children particularly vulnerable to abusing or being abused by their peers?
"I recently started seeing this boy online. He started off by being really nice and it was great to have someone else to talk to about being gay, as it's been hard in school lately. I'm not sure what happened or if I did something to upset him, but he's turned really nasty and has been threatening to tell my family all these personal things about me. They don't know that

I'm gay yet and I'm so scared about them finding out. I don't know what to do – I just want to die" (boy, 15)

Any child can be vulnerable to peer-on-peer abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to peer-on-peer abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family. Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to peer-on-peer abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers. Research suggests that peer-on-peer abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of peer-on-peer abuse within their settings, and recognise that these will play out differently in single sex, mixed or gender imbalanced environments.

III A whole school approach How can the School raise awareness of and prevent peer-on-peer abuse?

School environment
The School actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by:

- Educating all Governors, Senior Leadership Team, staff and volunteers, pupils and parents about this issue. This includes:
  - training all Governors, Senior Leadership Team, staff and volunteers on the nature, prevalence and effect of peer-on-peer abuse, and how to prevent, identify and respond to it. This includes (a) Contextual Safeguarding; (b) the identification and classification of specific behaviours; and (c) the importance of taking seriously all forms of peer-on-peer abuse (no matter how low level they may appear) and ensuring that no form of peer-on-peer abuse is ever dismissed as horseplay or teasing. Training includes case studies which the staff design themselves;
  - educating children about the nature and prevalence of peer-on-peer abuse via PSHCE and the wider curriculum. For example, by addressing gender inequality in a statistics class, or by reviewing literature in an English class which addresses bullying and its effect on mental health. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the School's approach to such issues, including its zero-tolerance policy towards all forms of peer-on-peer abuse.
  - engaging parents on this issue by:
  - (a) talking about it with parents, both in groups and one to one;
  - (b) asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks;
  - (c) involving parents in the review of School policies and lesson plans; and

(d) encouraging parents to hold the School to account on this issue.

- ensuring that all peer-on-peer abuse issues are fed back to the School's safeguarding team so that they can spot and address any concerning trends and identify pupils who may need additional support. This is done by way of engendering a culture in which staff feel able to raise concerns about pupils with the safeguarding team at any appropriate time in the week, confident that they will be listened to, advised and that concerns will be dealt with promptly and appropriately.
- challenging the attitudes that underlie such abuse (both inside and outside the classroom);
- working with Governors, Senior Leadership Team, all staff and volunteers, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community;
- creating conditions in which our pupils can aspire to and realise safe and healthy relationships;
- creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to; and
- responding to cases of peer-on-peer abuse promptly and appropriately.

Multi-agency working

The School will actively engage with its local partners in relation to peer-on-peer abuse, and work closely with, for example, children's social care, and/or other relevant agencies, and other schools. The relationships the School has built with these partners are essential to ensuring that the School is able to prevent, identify early and appropriately handle cases of peer-on-peer abuse.

They help the School
(a) to develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist;
(b) to ensure that our pupils are able to access the range of services and support they need quickly;
(c) to support and help inform our local community's response to peer-on-peer abuse;
(d) to increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our pupils.

The School will actively refer concerns/allegations of peer-on-peer abuse where necessary to the Worcestershire County Council's Family Front Door, children's social care, and/or other relevant agencies. This is particularly important because peer-on-peer abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

IV Responding to concerns or allegations of peer-on-peer abuse

General Principles

It is essential that all concerns/allegations of peer-on-peer abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our School environment. Any response should:

- include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);
- treat all children involved as being at potential risk - while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. Schools should ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter;
- take into account:
  - that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider socio-cultural contexts - such as the child's/children's peer group (both within and outside the School); family; the School environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child's/children's needs and to mitigate risk; and
  - the potential complexity of peer-on-peer abuse and of children´s experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting;
  - the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made. The School should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?

If a pupil is in immediate danger, or at risk of significant harm, a referral to children's social care (if the pupil is aged under 18) and/or the police should be made immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made (see Section 5 of the Safeguarding Children Policy). If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay (in accordance with Section 5 of the Safeguarding Children Policy) so that a course of action can be agreed.

If a child speaks to a member of staff about peer-on-peer abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. For further details please see the procedure set out in Section 5 of the Safeguarding Children Policy.

How will the School respond to concerns or allegations of peer-on-peer abuse?

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected. The DSL should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be 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 social care and/or any other external agencies on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL should contact refer to the West Midlands Safeguarding Children procedures website (section 3.3) and seek advice from the Family Front Door or Community Social Worker immediately, and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the allegations/concerns with in accordance with the local procedures and agree on a course of action, which may include:

A - Manage internally with help from external specialists where appropriate and possible
Where behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), scenarios B, C or D should ordinary apply. However, where support from local agencies is not available, the School may need to handle allegations/concerns internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).

B – Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family
These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services.

C – Refer child/children to children's social care for a section 17 and/or 47 statutory assessment
As a matter of best practice, if an incident of peer-on-peer abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.

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 such behaviour to the Police. For example, where the exchange of youth produced sexual imagery does not involve any aggravating factors (please see Appendix 7 of the Safeguarding Children Policy). All concerns/allegations will be assessed on a case by case basis, and in light of the wider context.

Individual risk and needs assessment
Where there is an incident of peer-on-peer abuse, the School will carry out a robust risk and needs assessment in respect of each child affected by the abuse. These risk assessments will:
  i.   assess and address the nature and level of risks that are posed and/or faced by the child;
  ii.   engage the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the long-term. Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child; and
  iii. be reviewed at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.

If at any stage the child's needs escalate, the DSL should contact the Worcestershire Family Front Door in accordance with local procedures to determine the appropriate course of action.

Disciplinary action

The School will consider whether disciplinary action may be appropriate for any child/children involved – any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour; (b) to demonstrate to the child/children and others that peer-on-peer abuse can never be tolerated; and (c) to ensure the safety and wellbeing of other children. However, these considerations must be balanced against the child's/children's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action the School will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the peer-on-peer abuse and the causes of it.

The School will, where appropriate, consider the potential benefit, as well as challenge, of suspension or whether the pupil concerned should be allowed to retain his or her place at the school, as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. Exclusion or expulsion will only be considered as a last resort and where necessary to ensure the safety and wellbeing of the other children in the School. Disciplinary interventions alone are rarely able to solve issues of peer-on-peer 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, as set out above and below.

On-going proactive work to a contextual whole-school approach

The School's response to concerns/allegations of peer-on-peer abuse should be part of on-going proactive work by the School to embed best practice and take a contextual whole-school approach to such abuse. As such the School's response can become part of its wider prevention work. This response may include the School asking itself a series of questions about the context in which an incident of peer-on-peer abuse occurred in the School, the local community in which the School is based, and the wider physical and online environment - such as:

a) what protective factors and influences exist within the School (such as positive peer influences, examples were peer-on-peer abuse has been challenged etc.) and how can the School bolster these?;

b) how (if at all) did the School's physical environment contribute to the abuse, and how can the School address this going forwards, for example by improving the School's safety, security and supervision?;

c) did wider gender norms, equality issues and/or societal attitudes contribute to the abuse?;

d) what was the relationship between the abuse and the cultural norms between staff and pupils and how can these be addressed going forwards?;

e) does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse?;

f) how have similar cases been managed in the past and what effect has this had?;

g) does the case or any identified trends highlight areas for development in the way in which the School works with children to raise their awareness of and/or prevent peer-on-peer abuse, including by way of the School's PSHCE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work?;

h) are there any lessons to be learnt about the way in which the School engages with parents to address peer-on-peer abuse issues?;

i) are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?;

j) does this case highlight a need to work with certain children to build their confidence and teach them how to identify and manage abusive behaviour?; and

k) were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the School?

Answers to these questions can be developed into an action plan that is reviewed on a regular basis by school leadership and the DSL.