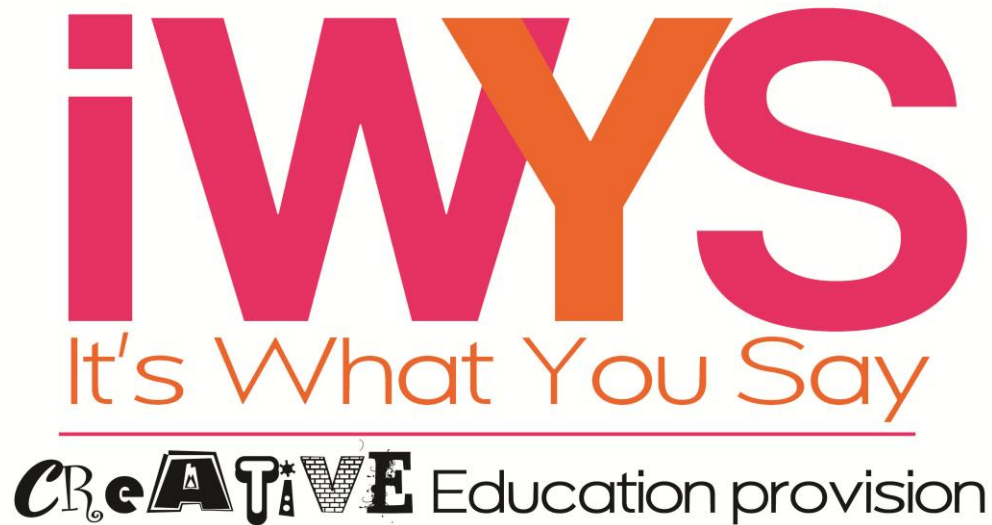




IWYS

ALTERNATIVE EDUCATION PROVISION

CHILD-ON-CHILD ABUSE POLICY

Academic Year 2026–2027

Effective from	1st September 2026
Review date	September 2027
Approved by	Charmaine Baineas/Proprietor / Head of Provision
Applies to	All staff, tutors, volunteers, visitors, contractors and students

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1. POLICY STATEMENT

IWYS Alternative Education Provision is committed to providing a safe, respectful and inclusive environment in which every child and young person is protected from abuse, intimidation, exploitation, harassment and violence.

IWYS recognises that safeguarding concerns can arise between children, as well as between adults and children. Child-on-child abuse can occur in person, online or through a combination of both.

IWYS adopts a zero-tolerance approach to abuse, while recognising that children who cause harm may themselves have safeguarding needs and may require support, assessment and intervention.

The absence of reported incidents must never be interpreted as evidence that child-on-child abuse is not occurring.

All concerns will be taken seriously, recorded appropriately, assessed on an individual basis and referred to the DSL or Deputy DSL without delay.

This policy reflects Keeping Children Safe in Education 2026 (KCSIE 2026), in force from 1 September 2026.

2. LEGISLATION AND STATUTORY GUIDANCE

This policy should be read alongside the most current versions of relevant statutory guidance and legislation, including:

- Keeping Children Safe in Education 2026 (KCSIE 2026)
- Working Together to Safeguard Children 2026
- Children Act 1989
- Children Act 2004
- Education Act 2002
- Equality Act 2010
- Sexual Offences Act 2003
- Protection of Children Act 1978
- Voyeurism (Offences) Act 2019
- Online Safety Act 2023
- Domestic Abuse Act 2021
- Counter-Terrorism and Security Act 2015
- Human Rights Act 1998
- Data Protection Act 2018 and UK GDPR
- Local Safeguarding Children Partnership procedures and protocols

Where statutory guidance is amended, IWYS will update its safeguarding arrangements and this policy as necessary.

3. PURPOSE OF THIS POLICY

The purposes of this policy are to:

- Prevent child-on-child abuse wherever possible.
- Ensure students understand what constitutes unacceptable behaviour.
- Ensure all staff recognise signs and indicators.
- Provide clear procedures for reporting concerns.
- Ensure allegations are responded to promptly and appropriately.
- Protect and support children who may have experienced abuse.
- Ensure children who have caused harm are also appropriately safeguarded.
- Prevent victim-blaming and minimise further trauma.
- Address harmful sexual behaviour, sexual harassment and sexual violence.
- Address bullying, cyberbullying and discriminatory abuse.
- Ensure online and offline abuse are considered together.
- Support effective multi-agency safeguarding where required.
- Identify patterns, locations, behaviours and environments in which abuse may occur.
- Promote a culture where students feel safe reporting concerns.

4. DEFINITION OF CHILD-ON-CHILD ABUSE

Child-on-child abuse occurs when a child or young person causes harm to another child or young person.

It may involve children of the same or different ages, friendship groups or backgrounds. It may occur face-to-face, online, through social media, messaging applications, gaming platforms or mobile phones, outside the education setting, during transport, work placements, trips or activities, or through a combination of online and offline behaviour. Child-on-child abuse may be a one-off incident or an ongoing pattern of behaviour.

5. FORMS OF CHILD-ON-CHILD ABUSE

Child-on-child abuse can include, but is not limited to:

- Bullying and cyberbullying
- Physical abuse and assault
- Sexual harassment
- Sexual violence
- Sharing nude or sexual images
- Upskirting and voyeurism
- Initiation, hazing and ritualised abuse
- Abuse within intimate personal relationships
- Coercive or controlling behaviour
- Prejudice-based and discriminatory abuse
- Online abuse and technology-facilitated abuse
- Harmful sexual behaviour
- Threats, intimidation and exploitation

The DSL will consider the whole context rather than treating each incident in isolation.

6. SEXUAL HARASSMENT

Sexual harassment between children is unwanted conduct of a sexual nature. It can include sexual comments, jokes, name-calling, sexualised teasing, unwanted sexual remarks, comments about someone's body, sexualised gestures, intrusive sexual questions, sexualised online comments, unwanted sexual content, sexual rumours and unwanted sexualised touching.

IWYS will not dismiss sexual harassment as “banter”, “just joking”, “boys being boys”, “girls being girls” or “normal teenage behaviour”. Where conduct is unwanted, harmful or causes distress, it must be addressed.

7. SEXUAL VIOLENCE

Sexual violence may include rape, assault by penetration, sexual assault, unwanted sexual touching, forcing or pressuring another child to participate in sexual activity, preventing someone from refusing sexual activity, threatening someone to obtain sexual contact or other criminal sexual behaviour.

Any allegation of sexual violence must be treated as a safeguarding matter, not simply as a behaviour issue. The DSL will determine the appropriate safeguarding response and whether referral to children's social care and/or the police is required.

8. SHARING OF NUDE OR SEXUAL IMAGES

Students must never be encouraged, pressured or forced to create or share nude or sexual images.

Concerns may involve creating an image, requesting an image, pressuring another child to send an image, forwarding or storing an image, threatening to share an image, sharing an image without consent, sexual extortion, or creating fake or manipulated sexual images.

Staff must not forward, copy or unnecessarily view sexual images of children. Where an image or video may constitute child sexual abuse material, staff must seek immediate advice from the DSL and follow safeguarding and law-enforcement procedures.

9. UPSKIRTING AND VOYEURISM

IWYS recognises upskirting and voyeurism as serious safeguarding concerns. This includes taking, attempting to take, possessing or distributing images of another person in circumstances where they have a reasonable expectation of privacy.

Examples include photographing under clothing, recording someone in a toilet or changing area, secretly recording intimate activity, or distributing recordings without consent.

Such incidents must be reported immediately to the DSL. – (Charmaine Baines – Email - charmaine@iwys.co.uk)

Tel: 07341214173

10. INITIATION, HAZING AND RITUALISED ABUSE

Students must not be subjected to initiation rituals, humiliating or dangerous challenges, violent or sexualised initiation, forced drinking or substance use, threats, coercion, humiliation or exclusion for refusing to participate.

Any such behaviour will be treated as a safeguarding concern.

11. ABUSE WITHIN INTIMATE PERSONAL RELATIONSHIPS

Child-on-child abuse may occur within relationships between young people. This can include controlling behaviour, coercion, threats, jealousy and monitoring, unwanted sexual activity, physical violence, emotional abuse, intimidation, monitoring phones, demanding passwords, controlling friendships, threatening to share images, sexual coercion and stalking.

Staff should be alert to the possibility that a child may not describe themselves as a victim or may minimise what has happened.

12. PREJUDICE-BASED AND DISCRIMINATORY ABUSE

Child-on-child abuse may be linked to race, disability, sex, sexual orientation, gender reassignment, religion or belief, pregnancy or maternity, age, nationality, culture, appearance, social background or special educational needs or disability.

IWYS will challenge discriminatory language and behaviour. Repeated discriminatory incidents may represent a safeguarding concern and must be considered alongside the child's wider circumstances.

13. TECHNOLOGY AND ONLINE ABUSE

IWYS recognises that online and offline abuse can be closely connected. Students may experience abuse through social media, group chats, messaging applications, gaming platforms, image-sharing services, fake accounts, manipulated content or other digital technologies.

Where an online incident affects a child's safety, wellbeing or education at IWYS, it will be considered as part of the safeguarding response. Where appropriate, IWYS will work with parents/carers, placing schools, children's social care, the police and other agencies.

14. HARMFUL SEXUAL BEHAVIOUR

IWYS recognises that harmful sexual behaviour exists on a spectrum. Behaviour may include inappropriate sexual language, sexualised conversations, unwanted sexual touching, coercion, sexual harassment, sexual assault and sharing sexual images.

Staff must avoid labelling children simply as “offenders” or “victims”. The circumstances, age, developmental stage, vulnerability and needs of all children involved must be considered.

The child who has displayed harmful behaviour may themselves be experiencing abuse, exploitation or other safeguarding concerns.

15. CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

Some children may be particularly vulnerable to child-on-child abuse, including children who have SEND, communication difficulties, additional learning needs, social isolation, previous abuse, care experience, mental health difficulties, domestic abuse, exploitation, difficulties at home, missing education, bullying, relationship difficulties or limited support networks.

However, any child can experience child-on-child abuse.

16. PRINCIPLE OF 'IT COULD HAPPEN HERE'

IWYS adopts the safeguarding principle that: "It could happen here."

The absence of previous reports does not mean that abuse is not occurring. Staff must remain professionally curious and consider whether apparently isolated incidents form part of a wider pattern.

17. RESPONSIBILITIES OF ALL STAFF

All IWYS staff have a responsibility to safeguard children. Staff must:

- Know the signs and indicators of child-on-child abuse.
- Maintain professional curiosity.
- Listen carefully to children.
- Take disclosures seriously.
- Never promise confidentiality.
- Report concerns immediately.
- Record concerns accurately.
- Avoid investigating allegations themselves.
- Avoid asking leading questions.
- Avoid blaming the child.
- Maintain professional boundaries.
- Follow the Child Protection and Safeguarding Policy.
- Follow DSL instructions.
- Attend safeguarding training.

18. RESPONSIBILITIES OF THE DESIGNATED SAFEGUARDING LEAD

The DSL will:

1. Receive and assess safeguarding concerns.
2. Ensure immediate safety measures are implemented.
3. Decide whether additional safeguarding action is required.
4. Liaise with parents/carers where appropriate.
5. Make referrals to children's social care where necessary.

6. Contact the police where a criminal offence may have occurred or immediate protection is required.
7. Work with the child's placing school where applicable.
8. Maintain appropriate safeguarding records.
9. Monitor patterns and repeat incidents.
10. Ensure children receive appropriate support.
11. Ensure the child alleged to have caused harm is also appropriately assessed.
12. Consider whether other children may be affected.
13. Work with external agencies where appropriate.
14. Review the effectiveness of interventions.

19. WHAT STAFF SHOULD DO IF A CHILD DISCLOSES ABUSE

DO:

- Listen calmly.
- Take the child seriously.
- Allow them to speak.
- Reassure them that they have done the right thing by telling someone.
- Explain that information may need to be shared to keep them safe.
- Record the disclosure accurately.
- Report the concern to the DSL immediately.

DO NOT:

- Promise secrecy.
- Investigate.
- Ask unnecessary or leading questions.
- Confront the alleged perpetrator.
- Express disbelief.
- Blame the child.
- Suggest that the child caused the incident.
- Attempt to mediate between the children.
- Share information with other students.

20. IMMEDIATE SAFETY

Where there is an immediate risk of harm, IWYS will take immediate steps to protect the child. This may include separating students, increasing supervision, changing timetables, restricting contact, providing a safe space, arranging safe collection, contacting parents/carers, contacting the placing school, children's social care or police, and seeking medical assistance.

Any action taken must consider the safety and welfare of all children involved.

21. RESPONDING TO AN ALLEGATION

When a concern is reported, the DSL will:

Step 1 – Establish immediate safety and determine whether anyone is currently at risk.

Step 2 – Obtain basic information and record what has been reported without conducting a full investigation.

Step 3 – Consider safeguarding thresholds, including seriousness, frequency, age and developmental differences, vulnerability, threats or coercion, injuries, sexual content, online involvement and whether a criminal offence may have occurred.

Step 4 – Decide whether external referral is necessary, including children's social care and/or police.

Step 5 – Develop a safety plan where required.

Step 6 – Provide support to affected children.

Step 7 – Monitor the situation and review whether interventions are effective.

22. INFORMATION SHARING

Information will be shared on a need-to-know basis where necessary to safeguard children.

Information may need to be shared with parents/carers, the placing school, children's social care, police, health professionals, safeguarding partners and specialist support services.

IWYS will follow applicable data protection requirements while recognising that safeguarding concerns can justify appropriate information sharing.

23. PARENTS AND CARERS

IWYS will work openly and constructively with parents/carers wherever appropriate.

Parents/carers may be contacted where their child is affected, safeguarding action is required or additional support is appropriate.

Parents/carers may not be informed immediately where doing so could increase risk to a child, compromise a police investigation or compromise a children's social care assessment. The DSL will seek appropriate professional advice where necessary.

24. SUPPORT FOR CHILDREN WHO HAVE EXPERIENCED ABUSE

IWYS will ensure that children who experience abuse receive appropriate support. This may include trusted adult support, pastoral support, regular check-ins, safeguarding safety plans, counselling referrals, support from the placing school, specialist external services, adjustments to the timetable or learning environment, additional supervision and online safety support.

The child should be involved in decisions about their support wherever appropriate.

25. SUPPORT FOR CHILDREN WHO HAVE CAUSED HARM

IWYS recognises that children who display harmful behaviour may themselves have safeguarding needs. They may have experienced abuse, neglect, exploitation, domestic abuse, trauma, inappropriate sexual exposure, online exploitation or harmful peer influences.

The DSL will consider whether a safeguarding referral or additional assessment is required. Behavioural consequences will be proportionate and consistent with IWYS policies. Safeguarding support does not remove the need to address harmful behaviour.

26. SEPARATION AND CONTACT

Where necessary, IWYS may implement arrangements to prevent further contact between children. This may include separate teaching areas, separate break/lunch arrangements, altered timetables, supervised movement, different arrival/departure arrangements and restrictions on online contact where appropriate.

Any restrictions should be regularly reviewed and should not unnecessarily disadvantage the child who has experienced abuse.

27. RECORD KEEPING

All child-on-child abuse concerns must be recorded appropriately. Records should include the date, time, names of children involved, factual account, disclosure or concern, actions taken, advice received, referrals, parental contact, safety measures, follow-up actions, outcome and review dates.

Records must be factual, objective and securely stored.

28. CONFIDENTIALITY

Safeguarding information is confidential. Staff must not discuss cases with other students, on social media, with friends, members of the public or colleagues who do not need the information.

Information should only be shared where there is a legitimate safeguarding or professional reason.

29. PREVENTION

IWYS will seek to prevent child-on-child abuse through safeguarding education, PSHE, relationships education, online safety education, respectful relationships work, anti-bullying work, consent education, equality and diversity education, appropriate behaviour expectations, supervision, effective safeguarding systems, staff training and student voice.

IWYS will monitor incidents and trends and use learning to improve prevention.

30. STUDENT EDUCATION

Students will be taught that:

- Everyone deserves respect.
- Consent matters.
- “No” means no.
- Pressure is not consent.
- Bullying is unacceptable.
- Sexual harassment is unacceptable.
- Sharing sexual images can cause serious harm.
- Online behaviour has consequences.
- Threats and coercion are not acceptable.
- Students should tell a trusted adult if they are worried.
- Reporting abuse is not “snitching”.
- Adults will take concerns seriously.

Education will be age-appropriate and sensitive to the needs of IWYS students.

31. STAFF TRAINING

All staff will receive safeguarding training appropriate to their role. Training will include awareness of child-on-child abuse, sexual harassment, sexual violence, harmful sexual behaviour, bullying, cyberbullying, online abuse, image sharing, coercive behaviour, discriminatory abuse, upskirting, exploitation, reporting procedures, recording procedures and information sharing.

Training will be updated in line with statutory guidance.

32. MONITORING AND IDENTIFYING PATTERNS

The DSL will monitor incidents to identify repeat perpetrators, repeat victims, locations and times of incidents, online platforms involved, recurring language, discriminatory patterns, sexual harassment patterns and bullying patterns.

This information will inform safeguarding actions and prevention work.

33. ALLEGATIONS INVOLVING STUDENTS AND STAFF

Where a concern indicates that a member of staff may have encouraged, ignored, facilitated or participated in child-on-child abuse, the concern must be managed under the relevant allegations-against-staff procedures and referred to the appropriate senior safeguarding lead and/or Local Authority Designated Officer (LADO) where required.

Staff must not attempt to investigate such allegations themselves.

34. CRIMINAL OFFENCES

Some forms of child-on-child abuse may constitute criminal offences, including assault, sexual assault, rape, threats, stalking, harassment, malicious communications and image-based abuse.

IWYS will seek advice from the police and/or children's social care where appropriate.

35. ALLEGED PERPETRATOR – NO ASSUMPTIONS

An allegation must not automatically be treated as proof that a child has committed an offence.

IWYS will establish safeguarding facts, avoid prejudging, protect all children, follow appropriate procedures and seek professional advice where necessary.

At the same time, IWYS will never minimise a safeguarding concern simply because the alleged perpetrator is also a child.

36. NO VICTIM-BLAMING

IWYS will never blame a child for experiencing abuse.

Staff must not suggest that a child “should have known better”, “led them on”, “should not have sent the image”, “should not have gone there”, “was asking for it” or “should have fought back”.

Responsibility for abusive behaviour rests with the person who chooses to behave abusively.

37. EQUALITY, DIVERSITY AND INCLUSION

IWYS will ensure that safeguarding responses are fair, proportionate and non-discriminatory.

Additional consideration will be given to children with SEND, communication difficulties, learning difficulties, disabilities and additional vulnerabilities. Reasonable adjustments will be made where required.

38. ALTERNATIVE PROVISION CONSIDERATIONS

As an Alternative Education Provision, IWYS recognises that students may have complex histories and may have experienced previous school exclusion, disrupted education, trauma, exploitation, bullying, peer conflict or safeguarding concerns.

IWYS will work closely with the placing school and relevant agencies. Safeguarding information relevant to a child's placement should be shared appropriately so risks can be managed consistently.

39. WORKING WITH OTHER AGENCIES

Where necessary, IWYS will work with placing schools, parents/carers, local authority children's services, police, health professionals, safeguarding partnerships, educational psychologists, specialist services, youth services and other relevant agencies.

The purpose is to ensure that safeguarding responses are coordinated and child-centred.

40. REVIEWING INCIDENTS

Following significant incidents, the DSL will consider:

- What happened?
- Was the child safe?
- Were staff aware of warning signs?
- Was the incident reported promptly?
- Were safeguarding procedures followed?
- Was external advice required?
- Are other children at risk?
- Is further staff training needed?
- Are changes to supervision or the environment required?
- Does the curriculum need to address the issue?
- Does the policy need updating?

41. STAFF QUICK-REFERENCE PROCEDURE

IF A STUDENT TELLS YOU ABOUT CHILD-ON-CHILD ABUSE:

1. **LISTEN** – Remain calm and listen.
2. **REASSURE** – Tell the child they have done the right thing by telling you.
3. **DON'T INVESTIGATE** – Do not interrogate or investigate.
4. **DON'T PROMISE CONFIDENTIALITY** – Explain that you may need to share information to keep them safe.
5. **RECORD** – Write down the facts as soon as possible.
6. **REPORT** – Tell the DSL immediately.
7. **SAFEGUARD** – Follow the DSL's instructions and ensure immediate safety.

42. STUDENT MESSAGE

You have the right to feel safe.

Nobody has the right to bully, threaten, hurt, pressure, touch or sexually harass you.

Nobody has the right to force you to send an image or video.

If something has happened to you, it is not your fault.

If you are worried about another student, tell a trusted adult.

Speaking up can help keep you and someone else safe.

43. POLICY MONITORING

The DSL and senior leadership will monitor implementation of this policy through safeguarding records, student voice, behaviour records, bullying records, attendance information, online safety concerns, safeguarding audits, staff feedback, parental feedback, multi-agency feedback and incident reviews.

44. POLICY REVIEW

This policy will be reviewed annually, or earlier where statutory guidance or legislation changes, serious safeguarding incidents occur, local safeguarding procedures change, an inspection identifies an area for improvement or emerging forms of online abuse require additional controls.

The policy will be reviewed against the current edition of KCSIE and relevant safeguarding guidance.

45. RELATED IWYS POLICIES

This policy should be read alongside:

1. Child Protection and Safeguarding Policy
2. Safer Recruitment Policy
3. Staff Code of Conduct
4. Behaviour Policy
5. Anti-Bullying Policy
6. Online Safety Policy
7. Attendance Policy
8. SEND Policy
9. Equality Policy
1. 10. Complaints Policy
2. 11. Whistleblowing Policy
3. 12. Managing Allegations Against Staff Policy
4. 13. Prevent Policy
5. 14. Relationships, Sex and Health Education Policy
6. 15. Data Protection and Information Sharing Policy

46. POLICY APPROVAL

Organisation	IWYS Alternative Education Provision
Policy	Child-on-Child Abuse Policy
Effective Date	1 September 2026
Review Date	September 2027
Approved by	Charmaine Baines
Signature / Date	September/October 2026 

Appendix A – Key Safeguarding Contacts

Complete the following details locally and keep them current.

Designated Safeguarding Lead (DSL)	Charmaine Baines – email – charmaine@iwys.co.uk Tel: 07341 214173
Deputy DSL	Joy Baines joy@iwys.co.uk – Tel: 07341 214170
Local Authority Children's Social Care	(01782 235100 - Children's Advice and Duty Service (CHaD))
Police – Emergency	999
Police – Non-emergency	101
LADO / Local Safeguarding Partnership	Integrated Front Door at 01782 235100 for LADO referrals

Important: Local safeguarding contact details must be completed by IWYS before this policy is issued to staff.

Appendix B – Statutory Guidance Check

This policy is intended to operate alongside the final Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026. IWYS should verify the current versions, local safeguarding partnership procedures and any placing-school requirements at each policy review.

Official guidance: GOV.UK – Keeping Children Safe in Education; GOV.UK – Working Together to Safeguard Children.