

# **Child-on-Child Sexual Abuse Audit Tool**

**2023-24**

**Version 2**

# Introduction and Context

This free toolkit has been designed by the Kent Safeguarding Children Multi-agency Partnership (KSCMP) and the KCC Education Safeguarding Service (formerly The Education People) collaboratively to help schools and colleges assess strengths that can be built upon, as well as weaknesses that should be addressed, to tackle **child-on-child sexual abuse and inappropriate sexual behaviours**. It was developed following the Ofsted review into sexual abuse in schools and colleges which was published in June 2021<sup>1</sup> and publication of 'Keeping Children Safe in Education' 2021. The original version was launched in October 2021.

We know that school leaders may have responded in different ways to the issues identified in the Ofsted review; indeed, some may feel the report does not accurately reflect what is happening in their own setting. However, Ofsted states **'even when leaders do not have specific information that indicates sexual harassment and online sexual abuse are problems for their children, they should act on the assumption that they are'**. 'KCSIE' 2021 further recognises that children are capable of abusing their peers and that child-on-child abuse can occur online and face to face, both physically and verbally. 'KCSIE' 2023 also states that staff working with children are advised to main an attitude of 'it could happen here', and this is especially when important considering child-on-child abuse. We therefore encourage you to use this audit toolkit so that, as a school, you can be assured you are being as robust and thorough as possible when addressing any issues relating to harmful sexual behaviour and child-on child sexual abuse.

This audit tool is not aiming to identify what is or is not harmful sexual behaviour in individual children and young people. However, as practitioners, primarily headteachers and DSLs, you should be able to distinguish between what is considered 'normal' childhood sexual behaviour and what would be considered developmentally inappropriate, problematic, or a 'Harmful Sexual Behaviour' (HSB). It should be acknowledged that children can behave in a manner which may be perceived as sexual from a very young age, although not always with sexual knowledge or harmful intent. Tools which can aid you in how to best respond to individual children are referenced at the end of this document.

The following are common examples of child-on-child sexually abusive and inappropriate behaviours:

- inappropriate or unwanted sexualised touching
- pressurising, forcing or coercing others to perform or take part in sexual acts
- pressuring, forcing or coercing someone to take nude, semi-nude or sexual images
- sharing nude or sexual images of a person without their consent
- the sharing of pornography with those who do not want to receive such content
- taking a picture under a person's clothing without their consent ('upskirting')
- sexual harassment (including online)
- sexual or sexist name calling (Contextual Safeguarding network 2020)

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<sup>1</sup> For a link to the Ofsted Review, please click [here](#).

## The Aim

This toolkit is intended to help you explore your school's safeguarding culture in relation to child-on-child abuse and to identify practices which may have, in some way, allowed certain behaviour amongst children and young people to go unchallenged or unassessed. **It is only intended for internal use – there is no requirement to submit any feedback to any external agency.** The aim is that the toolkit can help you openly consider and explore accepted norms with the children you support and amongst those adults who care for them.

It is hoped that by looking at the statements in the toolkit, schools and colleges can satisfy themselves that they are doing all they can to address any potential issues – as well as recognising strengths that can be built upon to further improve practice. The toolkit may also help to identify any areas of specific concern and aid settings in formulating action plans to address any areas of challenge should they need to. The toolkit does not provide an exhaustive list of all the possible areas of concern, but it will hopefully be a starting point for a reflection on schools and colleges' values, ethos and approaches.

Reviewing your current practice will enable you to identify areas for development that, once managed, will ultimately lead to children and staff being better protected. It is important, therefore, that you complete the following as fully and honestly as possible and review the content regularly. It should be recognised that schools and colleges may have areas which need to be improved or explored further and this tool will help identify areas for development. We would encourage schools to explore the wealth of information and guidance available which will be detailed in the references and which this toolkit draws upon.

If after completing this short audit you identify safeguarding issues within your school that are not covered in this tool then contact the Education Safeguarding Service to discuss whether you should explore a more comprehensive [safeguarding review](#).

[If you identify immediate safeguarding concerns regarding an individual child or young person and feel that statutory involvement is required then contact the Front Door -https://www.kscmp.org.uk/guidance/worried-about-a-child](https://www.kscmp.org.uk/guidance/worried-about-a-child)

There is an action plan attached to the end of this tool which you can use if you feel that there are areas that you need to address in your school that maybe of concern or that can be improved upon. Additionally, please make use of the links at the end for further resources and information.

This is version 2 of this toolkit, and we welcome any feedback from those schools who are using it. A review of the tool was completed in Spring 2023, and it was agreed by the KSCMP Education Safeguarding subgroup to keep the tool similar to how it is. This was based on the positive feedback that was received from those using the original tool. It is likely to be updated as we learn more from local and national case reviews and changes to any local and national policy, guidance, or legislation.

<b>Name of school</b>	
<b>Name of Designated Safeguarding Lead</b>	
<b>Name of Deputy Designated Safeguarding Leads</b>	
<b>Name of Designated Governor for Safeguarding</b>	
<b>Date completed by school (DD MM YY)</b>	
<b>Date of review by the school (DD MM YY)</b>	

## Safe Culture

Question	Yes/No	If yes, provide evidence to support response. If no, identify action required and date to be completed.
<b>Policies and Procedures</b>		
Are systems in place, specifically in relation to child-on-child sexual abuse, which make you confident that children are safe in your school?		
Are you satisfied that children are confident to talk to any member of staff in the school if they have a concern about child-on-child sexual abuse? <ul style="list-style-type: none"> <li>• Do you have an anonymised way for children to raise concerns?</li> <li>• Do you have safe spaces for children?</li> </ul>		
Does your school take steps to understand what barriers may exist to pupil disclosure and attempts to address these? <ul style="list-style-type: none"> <li>• <i>For example, friendship issues, shame, embarrassment or being seen as 'snitching' on others.</i></li> </ul>		
Are you confident that the children understand what is meant by child-on-child sexual abuse in an age-appropriate way?		
Do children have a clear understanding of the overall safeguarding processes in the school, how information may be shared and what action will be taken?		
Does your school proactively take steps to identify the nature and extent of child-on-child abuse taking place amongst pupils? <ul style="list-style-type: none"> <li>• <i>For example, by ensuring safeguarding records are</i></li> </ul>		

<p><i>correctly categorised, staff briefings discuss any intel, regular engagement activities with children and analyse any allegations made irrespective of outcome.</i></p>		
<p>Does your school implement a zero-tolerance approach regarding sexual violence and sexual harassment and clearly state that this behaviour is never acceptable?</p> <ul style="list-style-type: none"> <li>• <i>For example, not being passed off as “banter”, “just having a laugh” or physical behaviour such as pulling down of trousers or flicking bras is tolerated.</i></li> </ul>		
<p>Can the safeguarding team evidence that a culture of children accepting sexual harassment and violence as a ‘way of life’ is challenged, addressed and explored?</p>		
<p>If asked, would children speak positively about how the school manages issues relating to sexual harassment and sexual assaults?</p>		
<p><b>Responding to reports</b></p>		
<p>Are all staff aware of who to speak to in the senior leadership team if they have concerns about any child-on-child abuse issues?</p>		
<p>Are DSLs clear in their understanding of when they need to:</p> <ul style="list-style-type: none"> <li>• investigate internally?</li> <li>• make a request for support for an incident?</li> <li>• when to call the police?</li> <li>• consider not sharing a concern with parents?</li> </ul> <p>(This response should reflect requirements in <a href="#">Part 5 of</a></p>		

<a href="#">KCSIE 2023</a> )		
Where a young person has been identified as exhibiting Harmful Sexual Behaviour (HSB) now or in the recent past, has the school completed the relevant risk assessments and safety plans around that individual?		
What processes do you have to adequately assess risk where victims and their classmates learn alongside those children involved, or suspected of being involved, in harmful behaviours?		
How do you ensure that victims, alleged perpetrators and any other children involved/impacted are protected and supported in a manner which is sensitive, non-stigmatising and accessible?		

## Voice of the Child

Question	Yes/No	If yes, provide evidence to support response. If no, identify action required and date to be completed.
<b>Curriculum</b>		
Does teaching about child-on-child sexual abuse (including online) in RSE lessons and other subjects as appropriate, support pupils to feel confident about what the options would be for when they make a disclosure? How does this link in with the school's referral pathways?		

<p>How is your RSE curriculum taught in line with safe and effective principles and consider age-appropriate interventions?</p> <ul style="list-style-type: none"> <li>• <i>For example, establishing a safe classroom environment by setting ground rules that are age appropriate.</i></li> </ul>		
<p>How are pupils understanding of the issues raised in RSE/PSHE lessons tested and audited via discussions, summaries, and surveys. How do you know it is having an impact with the pupils?</p> <ul style="list-style-type: none"> <li>• <i>For example, can you evidence that issues around consent and coercive control are fully understood by the pupils?</i></li> </ul>		
<p>How does your school recognise that a 'one size fits all' education approach is not appropriate for all children, and a personalised/contextualised education approach specifically in relation to RSE might be needed?</p> <ul style="list-style-type: none"> <li>• <i>For example, targeted education for more vulnerable children, victims of abuse and SEND children.</i></li> </ul>		
<p>How do you ensure flexibility in your RSE curriculum to respond to any issues or concerns raised by children or if you identify something locally/nationally which may impact on your pupils?</p>		
<b>Behaviour Management</b>		
<p>Is there an up-to-date behaviour policy which is understood by all pupils, staff and volunteers and that refers to child-on-child sexual abuse, including HSB and online child-on-child abuse issues?</p>		
<p>How do you ensure that your behavioural policy links to the</p>		



support elements of your CP policy?		
How have the children and young people been involved in writing any behaviour policies, acceptable use policies and/or code of conduct?		
Has the school amended its child protection policy/processes in response to the issues relating to HSB and child-on-child sexual abuse? <ul style="list-style-type: none"> <li>If so, how and why.</li> </ul>		
How does your school try to work with parents to raise awareness of HSB/child-on-child abuse (including online) and encourage them to report any emerging concerns in and outside of the school environment?		
Does your school have an effective school council (or similar pupil body) that aims to engage young people in issues related to child-on-child abuse?		
How does your school encourage the pupil voice to discuss issues of concern including sexual violence or harassment?		
How does your school empower pupils to challenge and support each other as part of the response to child-on-child abuse? Can this be developed further?		
Do you have procedures and guidance in place that highlights the additional vulnerabilities of some children related to their gender identity, ethnicity sexual orientation, religious beliefs or their special education needs and disabilities?		

As a school do you offer non-judgemental, non-stigmatising information and advice to children and their parents, which is easily accessible to a range of cultures, religions, and literacy levels?		
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## Staff Awareness and Understanding (Identification)

Question	Yes/No	If yes, provide evidence to support response. If no, identify action required and date to be completed
<b>Staff responsibilities</b>		
Do all staff within your school use the same definition of child-child abuse and HSB, (drawn from KCSIE and the HSB definition used in the KSCMP procedures)? • Are the definitions clearly referenced in relevant school policies and other documentation?		
Do all staff understand that sexualised behaviour is on a continuum and even those that may be considered low level concerns need to be recorded?		
How are staff supported, motivated and confident to define, identify and respond to instances of child-on-child abuse, including online issues?		
Do all staff know where to access appropriate information and up to date resources that will aid their understanding of		

<p>levels of concerns and identification of harm?</p> <ul style="list-style-type: none"> <li>• <i>For example, Parent Protect, Stop it Now, Childnet.</i></li> </ul>		
<p>Are all staff discreet, clear in their understanding of confidentiality, and feel assured in the process to follow if a child reports a concern, or when receiving a disclosure?</p>		
<p>How do you know all staff understand the important role they have to play in preventing, recognising, and responding to child-on-child abuse, including online?</p>		
<p>How do you know all staff understand how the language and framing they use to describe child-on-child harmful behaviour can contribute to how matters are responded to?</p> <ul style="list-style-type: none"> <li>• <i>For example, victim blaming attitudes such as “girls wearing inappropriate skirts bringing unwanted attention”, “sending naked photos is stupid and it’s their fault if they get shared”, or “young people drinking excessive alcohol makes them vulnerable to abuse”.</i></li> </ul>		
<p>Has your school put approaches in place to challenge harmful societal norms, both overt and inadvertent ‘victim blaming’ attitudes by children and parents?</p> <ul style="list-style-type: none"> <li>• If so, how and what is in place?</li> </ul> <p><u>Do staff also understand the potential for ‘organisational grooming’ and what this means in practice? Here is the link to a helpful KSCMP Learning Resource (Grooming within organisations learning briefing).</u>  <a href="https://www.kscmp.org.uk/procedures/child-safeguarding-practice-reviews/published-local-child-safeguarding-reviews">https://www.kscmp.org.uk/procedures/child-safeguarding-practice-reviews/published-local-child-safeguarding-reviews</a></p>		
<p>Do all staff recognise that, even if there are no reports of</p>		

child-on-child abuse, it does not mean it is not happening and it may be the case that it is just not being reported?		
Are the Senior Leadership Team (SLT) quick to address any concerns they may have about members of staff dismissing or not responding effectively to incidents of reported sexual abuse and harassment between children?		
Do staff know how to escalate issues via the whistleblowing process if they are concerned there are failings in the school's safeguarding processes?		
<b>Training and induction</b>		
Do all staff receive training on child-on-child abuse and HSB, in addition to training on the safeguarding processes and other child protection issues generally?		
How are all staff supported by the DSL and SLT in their teaching of RSE to ensure that any safeguarding issues raised are responded to?		
How do you know all newly qualified staff are confident and comfortable in challenging and responding to incidents of sexual harassment or sexual assaults which they may see as part of their day-to-day work?		

## Online Safety (Prevention)

Question	Yes/No	If yes, provide evidence to support response. If no, identify action required and date to be completed
<b>Policies and procedures</b>		
Are all DSLs familiar with and following the UKCIS ' <a href="#">Sharing nudes and semi-nudes: advice for education settings working with children and young people</a> ' guidance?		
<p>How do you know all staff are familiar with your policies regarding use of mobile and smart technology and searches of mobile phone or personal devices?</p> <ul style="list-style-type: none"> <li>Do SLT carry out any action in line with the DfE '<a href="#">Searching, Screening and Confiscation</a>' guidance?</li> </ul>		
<b>Staff awareness and training</b>		
<p>How do you know all staff are aware that technology is a significant component or tool for facilitating child-on-child sexual abuse?</p> <p><i>For example, sending/receiving/making abusive, sexual harassing, and misogynistic messages, the non-consensual sharing of indecent images, and the sharing of abusive images and pornography.</i></p>		

## Health and Safety: physical spaces around the school

Question	Yes/No	If yes, provide evidence to support response. If no, identify action required and date to be completed
Are there any areas where potential problematic/harmful sexual behaviour or inappropriate physical contact can occur in your school and who with?		
What areas within school are supervised and unsupervised?		
<p>Are there particular areas in your setting that increases potential for harmful behaviour to occur</p> <p><i>For example, toilets, mobilisation around school in between lessons e.g., lunch time, breaktime?</i></p> <ul style="list-style-type: none"> <li>• If so, what's in place to respond to this?</li> </ul>		
<p>Is there anything in classrooms that increase inappropriate behaviour or is a potential area for concern?</p> <ul style="list-style-type: none"> <li>• <i>For example, seating arrangements, leaving the class during class time?</i></li> <li>• If so, what's in place to respond to this?</li> </ul>		
<p>Following an abusive incident, is the physical location where it occurred recognised, risk assessed and, where necessary, intervention taken to prevent future incidents?</p> <p>How is this communicated with parents and carers?</p>		

# Action Plan

Use your answers above and the table below to develop an action plan to develop your future practice. Consider which areas are most in need of attention and what resources or activities are required to achieve this.

Key area for development	Resources, support or activity required	Member of staff responsible	Date Completed

# Supporting Resources

The following links will provide further information and support for DSLs and school leaders.

KCC Education Safeguarding Service / The Education People

- [Education Safeguarding Service - Contact information](#)
- [Template policies](#)

DfE

- [Keeping Children Safe in Education \(KCSIE\)](#)
- [Teaching online safety](#)
- [Preventing and tackling bullying](#)
- [Searching, screening and confiscation at school](#)
- [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#)
- [Information sharing advice for safeguarding practitioners](#)

UK Council for Internet Safety (UKCIS)

- [Education for a connected world framework](#)
- [Questions for the governing board](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

UK Safer Internet Centre

- [Appropriate Filtering and monitoring guidance](#)

Other

- [Contextual Safeguarding Network - Beyond Referrals](#)
- [When to call the police](#)
- [Childnet: Online Sexual Harassment and Bullying Resources for Schools and parents/carers](#)

## Additional Information and Resources

NSPCC provide a dedicated [Harmful Sexual Behaviour](#) information page along with a [Harmful sexual behaviour: learning from case reviews page and briefing](#). There are also podcast and other resources that can be accessed on the [website](#).

The [PSHE Association](#) provides additional resources and guidance to schools to support integrating this topic into PSHE.

Appropriate language to use: [CSE Police Guidance](#)

[Disrespect nobody](#)- healthy relationships and respecting each other. Includes advice on sexting, relationship abuse, consent, rape, porn and harassment.



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[Safe4me](#) provides lots of advice and resources for professionals and young people.

[Parents Protect](#) also provides advice around many issues including HSB using a traffic light tool.

The [Stop it now! Helpline](#) provide a helpline and advice where there are concerns about a child or young person's sexual behaviour.

The Centre of expertise on child sexual abuse helps schools when they need to put in place safety plans and risk assessments where children have exhibited harmful sexual behaviour and still need to be in school. [Practice improvement - CSA Centre](#)