Cornwall Education Learning Trust

Child-on-child abuse and anti-bullying including managing allegations including sexual harassment and sexual violence

Safeguarding Policy Suite

Cornwall Education Learning Trust Policies
Cornwall Education Learning Trust (CELT), Atlantic Centre, Trenance Leisure Park, Newquay, Cornwall TR7 2LZ

Our Mission

At Cornwall Education Learning Trust (CELT), our mission is clear: to provide every learner with an **exceptional educational experience.** One that enables them to thrive, achieve and succeed in life. We believe in a **100%** mindset, that every learner, in every classroom, in every school, deserves the very best we can offer. For us, 100% means no compromise: no learner left behind, no community overlooked, and no opportunity wasted.

Our strategic goals reflect this ambition. We are committed to empowering and growing our people, building an ambitious all-through entitlement, forging exceptional relationships with our communities, transforming provision through meaningful partnerships, and leading an ethical, effective and innovative organisation. These are not just aspirations; they are promises that shape the way we work and the culture we are building together.



Our Values

Our values are at the heart of everything we do. We believe in the power of **Collaboration**, building strong relationships and working together as one team to achieve our collective goals. We are committed to **Empowerment**, creating a culture where initiative, innovation and trust flourish, and where every individual feels valued, respected and motivated.

As a Trust, we are grounded in promoting **Leadership**, sharing a moral and ethical purpose to improve the lives of others and make a lasting difference for our learners and communities. And we embrace **Transformation**, approaching change positively so that we can all become our best selves and do our best work.

These values guide every decision we make and every action we take. They are the foundation of our Trust and the reason we can offer such exceptional opportunities for our learners and staff. If you choose to join CELT, you will be part of a values-driven organisation where people are supported to grow, contribute, and thrive.

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1. Policy Overview

1.1 Safeguarding commitment

"It could happen here." We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to. The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure at Cornwall Education Learning Trust (CELT). The policy also informs parents and carers how we will safeguard their children whilst they are in our care.
children whilst they are in our care.

At Cornwall Education Learning Trust (CELT) we are committed to safeguarding and promoting the welfare of children and we expect all trustees, community champions, staff and volunteers to share this commitment. This policy is part of the following suite of annually updated safeguarding policies.

1.2 Policy Approval and Review

Policy Version Number:	4
Approved By:	Board of Trustees
Approved On (Date):	
Review Period:	Annually

1.3 Policy Version History

Policy Version	Date Issued	Summary of Changes
1	30.11.22	First Issue – No Changes
2	22.08.2024	Updated version
3	18.08.2025	KCSIE 25 references Pupils/Students to learners
4	08.08.2026	Updated om line with KCSIE 26 Updates in blue.

2. Policy Definitions and Framework

2.1 Purpose and Aims

Cornwall Education Learning Trust (CELT) is committed to providing an environment in which every learner feels safe, respected, included and able to learn.

We recognise that children can abuse other children and that child-on-child abuse can happen inside or outside school, online or offline, and may involve learners from the same or different schools or settings. We maintain an attitude of "it could happen here", including where there are no reported incidents.

Child-on-child abuse, bullying, harassment, discrimination and harmful behaviour will not be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys". Sexual violence and sexual harassment are never acceptable and are not an inevitable part of growing up.

This policy applies to all CELT schools and should be read alongside the Trust's:

- Child Protection and Safeguarding Policy;
- Behaviour Policy;
- Online Safety Policy;
- Relationships, Sex and Health Education (RSHE) Policy;
- SEND Policy;
- Equality information and objectives; and
- Attendance Policy.

Where behaviour between children raises a safeguarding concern, safeguarding procedures will take precedence over behaviour or anti-bullying procedures.

2.2 Legislation and Statutory Framework

This policy has been developed with regard to relevant legislation and statutory guidance, including:

- Children Act 1989 and Children Act 2004;
- Education Act 2002;
- Education and Inspections Act 2006;
- Equality Act 2010, including the Public Sector Equality Duty;
- Human Rights Act 1998;
- Sexual Offences Act 2003;
- Voyeurism (Offences) Act 2019;
- Keeping Children Safe in Education (KCSIE) 2026;
- Working Together to Safeguard Children 2026;

- statutory guidance on Relationships Education, Relationships and Sex Education and Health Education;
- Behaviour in Schools: advice for headteachers and school staff;
- Preventing and Tackling Bullying; and
- UK Council for Internet Safety guidance on sharing nudes and semi-nudes.

CELT will have regard to subsequent amendments or replacement statutory guidance.

3. Our principles and culture

CELT believes that safeguarding is everyone's responsibility. All learners have the right to attend school and learn without fear of abuse, bullying, harassment or discrimination.

Across our schools we will:

- promote a culture of respect, dignity, inclusion and equality;
- ensure learners know how and where to seek help;
- create safe and accessible ways for learners to report concerns;
- listen to learners and take their concerns seriously;
- challenge inappropriate, discriminatory and harmful behaviour;
- identify and respond to emerging patterns of behaviour;
- provide appropriate support to learners who have experienced harm and those who have caused harm;
- work in partnership with parents, carers and other agencies; and
- ensure staff have the knowledge and confidence to recognise and respond appropriately to concerns.

Staff will remain professionally curious and will not assume that the absence of reports means that child-on-child abuse is not occurring.

4. Understanding child-on-child abuse

Child-on-child abuse is abuse of a child by another child or children. It can occur between children of any age and sex, individually or in groups, and can take place inside or outside school and online.

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

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- abuse within intimate personal relationships between children (sometimes known as teenage relationship abuse);

- physical abuse, including hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- sexual violence and sexual harassment which may include misogyny/misandry;
- harmful sexual behaviour;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude or semi-nude images;
- digitally manipulated or AI-generated sexual imagery;
- upskirting;
- initiation or hazing-type violence and rituals;
- coercion, exploitation, intimidation or threatening behaviour; and
- abuse facilitated through technology.
- Physical assault wand harm, or the threat of harm with a weapon

Abuse may involve an imbalance of power arising from factors including age, developmental stage, physical strength, social status, disability, SEND, vulnerability, access to information or imagery, or the size of a group.

Children's behaviour exists on a continuum. Not every incident between children will constitute abuse. Behaviour may be developmentally expected, inappropriate, problematic or abusive, and professional judgement will be required.

A single incident may constitute abuse, harassment, discrimination or another safeguarding concern. Repetition is not required before CELT will act to protect a learner.

5. Bullying

There is no legal definition of bullying. For the purposes of this policy, bullying is generally understood as behaviour by an individual or group, usually repeated over time, which intentionally hurts another individual or group physically or emotionally and may involve an imbalance of power.

Bullying can be:

- physical;
- verbal;
- emotional or relational;
- online or technology-facilitated;
- sexual or sexist;
- racist;

- related to religion or belief;
- homophobic, biphobic or transphobic;
- related to SEND or disability; or
- related to appearance, health, family circumstances or another actual or perceived difference.

Bullying may occur in school, during school activities, travelling to or from school, online or within the wider community.

CELT schools may use the learner-friendly acronym STOP – Several Times On Purpose to support understanding of bullying. This is not a threshold for intervention. A single incident of harmful, discriminatory, abusive or prejudicial behaviour will be taken seriously and responded to appropriately.

Schools may respond to behaviour occurring outside school where it affects learners, the school community, the orderly running of the school or the safeguarding and welfare of children.

6. Prejudice, discrimination and vulnerability

CELT has due regard to its duties under the Equality Act 2010 and will not tolerate discriminatory or prejudicial bullying, harassment or victimisation.

Staff will recognise that some learners may be particularly vulnerable to child-on-child abuse or may face additional barriers to recognising or reporting it.

This may include, but is not limited to, learners with SEND or disabilities, children in care or previously in care, young carers, children experiencing adversity or abuse within their family, and learners who are socially isolated or otherwise vulnerable.

KCSIE identifies that girls, children with SEND and LGBT children can be at greater risk of child-on-child sexual violence and harassment. This does not mean that other learners cannot experience abuse. Staff will avoid assumptions and ensure that the experiences of all learners are recognised and responded to.

7. Prevention and education

CELT's response to child-on-child abuse and bullying begins before an incident occurs.

Schools will establish a strong safeguarding and behaviour culture in which learners understand respectful relationships, appropriate boundaries and how their actions affect others.

Through the curriculum, RSHE, assemblies, pastoral support and wider school life, learners will be taught, in an age and developmentally appropriate way, about:

- healthy and respectful relationships;
- boundaries and consent;
- equality, respect and protected characteristics;
- recognising bullying, harassment, abuse and coercive behaviour;

- sexual harassment and harmful sexual behaviour;
- online safety and online relationships;
- appropriate and inappropriate sharing of images;
- harmful online content and technology-facilitated abuse, including AI-generated or manipulated content; and
- how to seek help and report concerns.

Schools will use information from safeguarding, behaviour, attendance, learner voice and other relevant sources to identify patterns, locations, groups or emerging concerns and take preventative action.

8. Reporting concerns

Learners will be provided with clear, accessible and well-promoted ways to report concerns and will be encouraged to speak to a safe adult.

All reports will be taken seriously. A learner will never be made to feel that they are creating a problem by reporting abuse, bullying or harassment, nor will they be made to feel ashamed for making a report.

Staff receiving a safeguarding disclosure will:

- listen carefully and avoid asking leading questions;
- reassure the learner that they have done the right thing by speaking;
- not promise confidentiality;
- make an accurate record; and
- report safeguarding concerns to the Designated Safeguarding Lead (DSL) or deputy without delay.

Where there is an immediate risk of harm, staff will act immediately in accordance with the Safeguarding and Child Protection Policy.

Bullying or behaviour concerns which do not meet a safeguarding threshold will be managed through the school's behaviour and anti-bullying arrangements. Any concern that indicates abuse, exploitation, significant harm, sexual violence, harmful sexual behaviour or another safeguarding risk must be referred to the DSL.

Anyone can raise a concern. See safeguarding appendix for details.

9. Responding to child-on-child abuse

The DSL or deputy will lead the safeguarding response to child-on-child abuse and an appropriate member of staff will lead the response to bullying or behaviour concern.

The response will be child-centred, proportionate to the nature and seriousness of the concern and informed by the age, developmental stage, vulnerability and individual needs of the learners involved.

The staff member will consider:

- the immediate safety and wellbeing of all learners involved;
- the wishes and feelings of the learner who has experienced harm;
- the nature and seriousness of the alleged behaviour;
- whether there is an imbalance of power, coercion or exploitation;
- whether other learners may be at risk;
- whether the behaviour forms part of a wider pattern;
- risks arising inside and outside school and online;
- whether parents or carers should be informed;
- whether Children's Social Care, the police or another agency should be involved; and
- what support, safety planning and ongoing monitoring are required.

Parents and carers will normally be informed unless doing so would place a child at additional risk or otherwise be contrary to the child's welfare or advice from statutory agencies.

Where a child is suffering, or is likely to suffer, harm, a referral will be made to Children's Social Care. Where a criminal offence may have been committed, the DSL will consider whether police involvement is required and will follow relevant statutory guidance.

School staff will establish sufficient information to determine the immediate safeguarding response but will avoid investigative action that could prejudice an investigation by Children's Social Care or the police.

10. Sexual violence, sexual harassment and harmful sexual behaviour

All reports of sexual violence, sexual harassment and harmful sexual behaviour will be taken seriously and managed in accordance with **Part Five of KCSIE 2026** and the Trust's safeguarding procedures.

The DSL or deputy will lead the school's response and undertake or oversee an appropriate risk and needs assessment.

Immediate consideration will be given to:

- protecting and supporting the learner who has experienced harm;
- managing contact between the learners involved;
- the safety and wellbeing of other learners;

- the support and supervision required by the learner alleged to have caused harm;
- education, transport and movement around the school;
- the wishes and feelings of the learner who has experienced harm; and
- whether Children's Social Care and/or the police should be involved.

Any arrangements to separate learners are safeguarding measures and should not be interpreted as a judgement about the outcome of an allegation.

Risk assessments and safety plans will be regularly reviewed and adapted as circumstances change.

11. Online abuse and nude or semi-nude imagery

Child-on-child abuse occurring online or through technology will be treated as seriously as abuse occurring face-to-face.

This includes cyberbullying, sexual harassment, coercion, threats, unwanted sexual messages, sexualised bullying, sharing sexual content, and the creation or distribution of digitally altered or AI-generated harmful or sexual imagery.

Incidents involving nude or semi-nude images will be managed in accordance with KCSIE and current UKCIS guidance. Staff must not view, copy, print, share or save such imagery and will seek advice from the DSL in accordance with the Trust's safeguarding procedures.

12. Supporting learners

CELT recognises that all children involved in child-on-child abuse may require support.

Support for a learner who has experienced harm will be determined by their individual needs and may include a trusted adult, pastoral support, adjustments to their school day, safety planning, curriculum support and referral to external services.

Learners who have caused or are alleged to have caused harm will also be considered as children in need of appropriate safeguarding, support and intervention. The school will seek to understand the factors contributing to the behaviour while maintaining clear boundaries and accountability.

Consequences under the Behaviour Policy may be appropriate alongside safeguarding intervention.

Restorative approaches or mediation will only be considered where they are safe, appropriate and genuinely voluntary. They will not be used where they may increase risk, minimise abusive behaviour, place responsibility on the learner who has experienced harm or cause further distress.

Support and safety arrangements will be reviewed for as long as necessary.

13. Confidentiality and information sharing

Information will be shared on a need-to-know basis and in accordance with safeguarding legislation and guidance.

Staff will never promise a learner absolute confidentiality. Where information needs to be shared to protect a child or another person from harm, this will be explained to the learner wherever it is appropriate and safe to do so.

A learner's request that information is not shared will be considered carefully by the DSL, but this cannot override the school's duty to safeguard children.

Parents and carers will normally be informed about safeguarding concerns unless there is a reason to believe that doing so would place a child at greater risk or interfere with a statutory investigation.

14. Recording and monitoring

Concerns, disclosures, decisions, actions and the rationale for decisions will be recorded accurately and securely on the school's safeguarding recording system.

Bullying, discriminatory and prejudice-related incidents will be recorded in accordance with CELT and school procedures to enable patterns and trends to be identified.

Schools will analyse relevant safeguarding and behaviour information to identify:

- repeated incidents;
- vulnerable learners or groups;
- patterns of discriminatory or prejudicial behaviour;
- locations or times of increased risk;
- online or emerging forms of harm; and
- the effectiveness of preventative and responsive action.

Themes and trends will inform safeguarding, behaviour, curriculum, staff training and school improvement activity.

15. Roles and responsibilities

Trustees and Trust leaders

Trustees will provide appropriate oversight and assurance that CELT schools have effective arrangements to prevent, identify and respond to child-on-child abuse and bullying.

Headteachers

Headteachers are responsible for ensuring this policy is implemented effectively within their school and that safeguarding, behaviour, curriculum and pastoral systems operate together to protect learners.

Designated Safeguarding Leads

The DSL will provide leadership in relation to safeguarding concerns involving child-on-child abuse, including risk assessment, referrals, information sharing, safety planning and liaison with statutory agencies.

All staff

All staff are responsible for:

- maintaining an attitude of "it could happen here";
- challenging inappropriate and harmful behaviour;
- recognising indicators of child-on-child abuse;
- listening to learners;
- reporting safeguarding concerns without delay; and
- contributing to a culture in which learners feel safe to speak.

Learners

Learners are encouraged to treat others with dignity and respect, seek help when they are worried about themselves or someone else, and report bullying, abuse, harassment or discrimination.

Parents and carers

Parents and carers are encouraged to raise concerns with the school at the earliest opportunity and work in partnership with the school to support the safety and wellbeing of learners.

16. Monitoring and review

CELT and individual schools will monitor the implementation and effectiveness of this policy through safeguarding assurance, analysis of incidents and trends, learner voice and relevant behaviour, equality and safeguarding information.

Learning from incidents will be used to strengthen preventative practice, curriculum provision, staff training and safeguarding arrangements.

This policy will be reviewed at least annually and updated sooner where there are changes to legislation, statutory guidance or identified safeguarding practice.

Appendix 1 – School Level Reporting Arrangements

Each CELT school will ensure that learners, parents and carers understand how to report concerns about bullying, prejudice, discrimination or child-on-child abuse.

Reporting arrangements will be clearly communicated, easily accessible and appropriate to the age and needs of learners within the school.

Learners

Learners are encouraged to report any concern about themselves or another learner to a trusted adult.

Learners may:

- speak directly to any member of staff they trust;
- speak to their tutor, class teacher, pastoral lead or another identified member of staff;
- ask a friend, prefect or trusted peer to help them report a concern;
- ask a parent or carer to report a concern on their behalf;
- use the school's designated reporting system or anti-bullying reporting form, where available; or
- use another recognised source of support, such as Childline.

A learner does not need to be certain that behaviour constitutes bullying or abuse before reporting it. Any concern that causes a learner to feel unsafe, uncomfortable, worried or harmed should be shared with a trusted adult.

Parents and carers

Parents and carers are encouraged to raise concerns at the earliest opportunity.

They may:

- contact their child's class teacher, tutor or pastoral lead;
- contact the school's designated anti-bullying or pastoral lead;
- use the school's reporting form or reporting system, where available; or
- contact the Designated Safeguarding Lead where they believe there may be a safeguarding concern.

Parents and carers will be listened to and concerns will be considered alongside information available to the school.

Staff

Where a concern is reported to or identified by a member of staff, they will determine whether the matter is a behaviour or bullying concern, or whether there are indicators that it may constitute a safeguarding concern.

Where there is any indication of abuse, exploitation, sexual behaviour, significant harm or another safeguarding risk, the concern must be reported to the Designated Safeguarding Lead or deputy without delay.

Staff should not investigate safeguarding allegations before referring them to the DSL. A factual record should be made in accordance with CELT safeguarding and recording procedures.

School reporting information is available on the CELT Safeguarding appendix on the school website.

Where a parent or carer remains concerned following the school's response, concerns may be escalated in accordance with the school's complaints procedure or the Trust's safeguarding escalation arrangements, as appropriate.

Appendix 2: School-Level Prevention Arrangements

CELT recognises that the prevention of bullying and child-on-child abuse begins with a strong safeguarding culture in which respectful behaviour is taught, modelled and consistently reinforced.

Each school will implement preventative arrangements that are appropriate to its learners, age range, context and identified risks.

Prevention will include:

- developing learners' understanding of respectful relationships and acceptable behaviour;
- ensuring learners know how to recognise and report bullying, harassment, discrimination and abuse;
- promoting confidence in reporting and ensuring learners know that concerns will be taken seriously;
- involving parents and carers in reinforcing expectations and responding to emerging concerns;
- providing appropriate staff training and safeguarding updates;
- using assemblies, tutor time, pastoral provision and other opportunities to reinforce expectations;
- teaching relevant content through Relationships Education, Relationships and Sex Education, Health Education and PSHE;
- ensuring appropriate supervision of areas and times where learners may be more vulnerable;
- identifying and responding to patterns, locations or groups associated with increased concern;
- gathering learner voice and responding to what learners say about safety and relationships;

- addressing prejudice, discriminatory language, sexual harassment and other harmful attitudes at an early stage; and
- reviewing the effectiveness of preventative activity in light of safeguarding, behaviour and bullying information.

Schools will not rely solely on reported incidents to determine whether concerns exist. Staff will remain alert to changes in behaviour, attendance, relationships and learner wellbeing and will maintain an attitude of "it could happen here" and adapt preventative arrangements where required.