

Responding to Harmful Sexual Behaviour, Sexual Harassment and Violence

1. Background

In 2021, the Department for Education commissioned Ofsted to undertake a rapid review of sexual abuse in schools and colleges across England. The review highlighted the prevalence of child-on-child sexual harassment, sexual violence and online sexual abuse, and found that many incidents go unreported.

The findings reinforced the need for schools, colleges and partner agencies to take a proactive approach to safeguarding, recognising that harmful sexual behaviour, sexual harassment and sexual violence may occur even where there have been no disclosures or reported concerns.

St Piers School and College and Young Epilepsy Services are committed to providing a safe, inclusive and respectful environment where children, young people and adults at risk are protected from sexual violence, sexual harassment, harmful sexual behaviour and online abuse. We maintain a culture of vigilance, where concerns are taken seriously, acted upon promptly and used to inform ongoing safeguarding practice.

2. Introduction

We recognise that sexual harassment, sexual violence and harmful sexual behaviour occur across society and can take many forms. Such behaviour can be difficult to identify and, if not recognised and addressed, may contribute to an environment where inappropriate conduct becomes normalised. This can leave children and young people feeling unsafe, isolated and unsupported.

St Piers School and College and Young Epilepsy Services are committed to promoting a safe, inclusive and respectful culture where harmful sexual behaviour, sexual harassment and sexual violence are not tolerated. We are committed to raising awareness, challenging inappropriate behaviour and responding promptly and proportionately to concerns when they arise.

We take all reports of harmful sexual behaviour, sexual violence and sexual harassment seriously and are committed to managing them sensitively, effectively and in a timely manner. We are clear that sexual violence and sexual harassment are never acceptable and will never be dismissed as banter, humour, part of growing up or a consequence of an individual's additional needs or disabilities. Concerns will be managed in line with safeguarding and child or adult protection procedures, including consultation with external agencies where appropriate.

Children and young people with Special Educational Needs and Disabilities (SEND) are known to be at increased risk of abuse and exploitation. Some children and young people with learning disabilities may also require additional support to understand relationships, consent, boundaries and appropriate sexual behaviour.

Children and young people who are lesbian, gay, bisexual, transgender or questioning (LGBTQ+ community) can be targeted by their peers and may be particularly vulnerable to harassment, discrimination and abuse. Young people perceived to be LGBTQ+ community may face similar risks, regardless of their sexual orientation or gender identity.

Children and young people may display a range of sexual behaviours as they grow and develop. Many of these behaviours are age and developmentally appropriate (see Appendices 1 and 2); however, some behaviours may be inappropriate, problematic, harmful or abusive and require assessment, support and intervention.

We recognise that children and young people can be both vulnerable to and capable of displaying harmful sexual behaviour towards their peers. We also recognise that some children and young people may not recognise their experiences as harmful, may not feel ready to seek help, or may struggle to communicate concerns. Maintaining a knowledgeable, vigilant and supportive staff team is therefore essential to identifying concerns early and ensuring that children and young people receive appropriate support and protection.

3. Monitoring and Review

This procedure will be reviewed annually along with the Child and Adult Protection and Safeguarding Policy and Procedure.

In addition, the Governing Body will be provided with relevant anonymised information regarding harmful sexual behaviour, sexual harassment and sexual violence to enable them to carry out their oversight function and monitor trends, themes and organisational learning arising from such incidents.

4. Child on child abuse (Peer on Peer abuse)

The principles and actions relating to child-on-child abuse also apply to adult students, taking account of their developmental age, assessed needs and mental capacity.

Across St Piers School and College and Young Epilepsy, we support children, young people and adults with a wide range of complex needs. Some students may display behaviours that challenge those around them, including staff and peers. We seek to minimise the risk of inappropriate, problematic or harmful sexual behaviour through effective support, positive behaviour approaches, and age- and developmentally appropriate Personal, Social, Health and Economic (PSHE) and Relationships, Sex and Health Education (RSHE).

We recognise that child-on-child abuse can occur in any setting. While behaviour may be influenced by an individual's communication needs, emotional regulation, cognitive profile, previous experiences, trauma, health needs or environmental factors, these factors do not diminish the impact on those affected and do not prevent appropriate safeguarding action being taken.

We recognise that, nationally, girls are more likely to be victims and boys more likely to be perpetrators of sexual violence and sexual harassment. However, all child-on-child abuse is unacceptable and all concerns will be taken seriously regardless of the sex, gender, age, disability or individual circumstances of those involved.

Contributing factors may include:

- difficulties communicating needs, wishes or boundaries
- difficulties with emotional regulation
- side effects of medication or physical health conditions
- physiological or sensory triggers
- previous experiences of abuse, neglect or trauma
- a limited understanding of relationships, consent, privacy or social boundaries.

It is important that staff know the students they work with and follow agreed support plans, risk assessments and guidance from relevant professionals to ensure behaviour is managed safely, consistently and positively.

We will minimise the risks by:

- maintaining a clear zero-tolerance approach to sexual violence, sexual harassment and harmful sexual behaviour. Such behaviour will never be dismissed as banter, humour, a part of growing up, or a consequence of additional needs or disabilities
- recognising that a lack of reports does not mean abuse is not occurring and fostering a culture in which concerns can be raised and acted upon
- challenging inappropriate and potentially criminal behaviour, including unwanted sexual touching, pulling down clothing, lifting skirts, flicking bras and other behaviour that violates another person's dignity, privacy or bodily autonomy
- adopting a whole-setting approach to safeguarding and child protection
- providing safeguarding training and awareness for staff, trustees and governors
- promoting clear values, expectations and standards of behaviour through pastoral support, behaviour strategies and the curriculum
- engaging specialist support and intervention where appropriate
- responding promptly and robustly to reports of harmful sexual behaviour, sexual harassment and sexual violence
- providing effective PSHE and RSHE education that promotes healthy relationships, consent, respect, privacy and personal safety.

5. Responding to reports of sexual violence and/or sexual harassment

Children and young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This could adversely affect their education attainment as well as their emotional well-being. Reports of sexual violence and sexual harassment can be complex to manage. It is essential that victims are protected, offered appropriate support and that every effort is made to ensure their education is not disrupted. It is also important that other students and staff are

supported and protected as appropriate. (Appendices 3, 4 and 5 provide further information on the definitions of harmful sexual behaviour, sexual harassment and sexual violence)

We will consider every report on a case-by-case basis. When to inform the alleged perpetrator will be a decision that will be carefully considered. Where a referral is made to Children's/Adult Social Care and/or the Police, then, as a general rule, we will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations.

If the report includes an online element staff will be mindful of the [Searching, screening and confiscation at school - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/searching-screening-and-confiscation-at-school) guidance.

Reports involving the creation, possession, sharing or threat to share nude, semi-nude, sexually explicit, AI-generated or digitally manipulated images will be managed as safeguarding concerns. Consideration will be given to the welfare of those involved, any criminal offences that may have occurred, and the need for external agency involvement.

The staff member who has been informed of, received a disclosure about, or witnessed an incident of harmful sexual behaviour, sexual violence or sexual harassment must inform the DSL/DSO immediately. The concern must be promptly recorded on MyConcern and managed in accordance with safeguarding procedures.

Following a report of harmful sexual behaviour, sexual harassment or sexual violence, the DSL/DSO will undertake an immediate risk and needs assessment on a case-by-case basis. This should consider the nature of the incident, the impact on those affected, whether a crime may have been committed, and any ongoing risk to the victim or others.

We will carefully consider which staff should know about the report and any support that will be in place for the young people involved.

Staff dealing with a disclosure can never promise confidentiality, as this cannot be guaranteed.

The risk assessment should consider:

- the details of the concern raised and any information shared by the child or adult at risk or by someone on their behalf
- impact on the alleged victim and how they will be supported and protected from any further harm, pending further investigation
- the location of the alleged perpetrator
- the risk of harm to any other students in the environment
- the ages and ability levels of the students involved, and any power imbalance between them.
- any previous or related incidents
- the wider context, such as what contact the alleged victim and perpetrator have – are they in the same class, tutor group, residential house or share the same transport.

- the wishes of the alleged victim, as appropriate.
- whether the concerns indicate a broader safeguarding, behavioural or cultural issue requiring further action.

Ultimately, we will have to balance the victim's wishes against their duty to protect the victim and other children and young people. If we do decide to make a referral to MASH/C-SPA and/or a report to the police against the victim's wishes, this will be handled due sensitivity and extremely carefully. The reasons will, in most cases, be explained to the victim and appropriate specialist support offered.

The risk assessment will be filed on MyConcern® and will be kept under regular review, by the Lead DSL and relevant Deputy DSL and Head of Department, reflecting any changes in circumstances.

Further support regarding risk assessments can be accessed from the [Education Safeguarding Team](#) – education.safeguarding@surreycc.gov.uk

If a child is at risk of harm, is in immediate danger, or has been harmed, a Request for Support will be made to the C-SPA securely via email: cspa@surreycc.gov.uk or by telephone on 0300 470 9100, as appropriate.

For an adult at risk please contact the MASH via email: ascmash@surreycc.gov.uk or by telephone on 0300 470 9100, as appropriate.

Where a student lacks capacity to make or communicate decisions regarding outcomes, decisions should be made in their best interests in accordance with safeguarding duties and the principles of the Mental Capacity Act 2005. ***This decision should be made in line with safeguarding not just for that student, but potentially for their peers who may be at risk of similar behaviour from the perpetrator.***

Parents or carers and social workers would usually be informed unless this could put the child or young person at greater risk. If the person lacks capacity, we should seek the views of that student's advocates(s) if appropriate, however, whether or not to involve the police is not generally a decision they should make, regardless of capacity. This is due to the potentially wider implications including the protection of others and not just the individual involved.

When there is a criminal investigation into a rape, assault by penetration or sexual assault, we will need to ensure that the alleged perpetrator has no contact with the victim.

Where we are aware that an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, we will be mindful of anonymity, witness support arrangements and the wider criminal process so that we can provide appropriate support and act in a proportionate and informed manner. We will also take all reasonable steps to protect the anonymity and privacy of any child or young person involved in a report of sexual violence or sexual harassment.

Where a criminal investigation into rape or assault by penetration results in a conviction or caution, St Piers School and College will take robust and proportionate action, including consideration of permanent exclusion. In all but the most exceptional circumstances, such conduct will be considered a serious breach of behavioural and

safeguarding expectations. The organisation is likely to conclude that allowing the perpetrator to remain within the school or college community would seriously compromise the safety, welfare and educational experience of the victim and could present an ongoing risk to other students and the wider community.

Appropriate support, risk management measures and safeguarding interventions will be considered for the victim, the alleged perpetrator and any other students affected by the incident. Support will be tailored to individual need and reviewed regularly. Where incidents and/or behaviours are associated with factors outside St Piers School and College or occur between children and young people outside our setting, we will consider contextual safeguarding.

This procedure is agreed by the Director of Education and will be implemented by all Departments.

Signed: 	Date: 31 July 2026
Name: Ben Bastin Title: Director of Education	Date of review: 01 September 2028

Version table			
Creation: - Gill Walters			
Approved by: - Director of Education			
Version No.	Date of changes	Reason for change	Changes made by
1	N/A	N/A First Version September 2022	N/A
2	Sept 23	Update to KSCIE 2023	Gill Walters
3	Jan 25	Update to KSCIE - 2024	Gill Walters
4	Sept 25	Update to KSCIE - 2025	Gill Walters
5	July 26	Annual review. Updated references to Keeping Children Safe in Education 2026. Minor revisions to strengthen guidance relating to harmful sexual behaviour, child-on-child abuse, risk assessment, recording requirements, and online sexual abuse including AI-generated and digitally manipulated images.	Gill Walters

Appendix 1

Sexual Development

Whilst each child is different, there are four different stages to childhood sexual development. Some children may develop later than others depending on their understanding and their own global development.

The stages of development are:

Infancy from 0-4 years old.

Sexual exploratory behaviours start to emerge such as by kissing, cuddling, showing curiosity about their genitals and talking about them. Children may not show inhibitions such as by wandering round naked. They imitate and copy behaviours of life around them including 'mummies and daddies' and 'doctors and nurses'. Random masturbation can occur as this is a sensual stage in development. The distinction between toileting behaviours and comforting behaviours begin to emerge. Parents and carers are most influential, and children learn the social rules and what is permissible from them.

Young children from 5-9 years old.

As they become older, children start recognising the need for greater privacy. At the same time there are more exploratory behaviour with peers, as well as them comparing their bodies with their peers and asking more questions. Masturbation is less random but more likely among boys due to gender socialisation. They may use words associated with body parts or sex that they may have heard, and they may try to shock adults around them by using these words although they do not fully understand the meaning. The influence of peers begins to emerge.

Pre-adolescents from 10-12 years old.

Children become more curious about sex and sexual behaviour, such as through kissing, hugging and 'dating' other children. They may become more interested in other people's body parts and the changes that happen in puberty. At this age children become more aware about sex and bodies and so they may start to ask more questions about relationships and sexual behaviour. They might try to find out information about sex from the internet and may be influenced by social media. Children may start to masturbate in private as they develop a greater awareness of the need for privacy.

Adolescents from 13-16 years old.

As puberty starts, sexual behaviour becomes more private with young people kissing, hugging, dating and forming short and longer-lasting relationships with peers. They may be interested in and asking questions about body parts, relationships and sexuality. Young people may use sexual language and talk about sex with friends. They may look for sexual pictures or pornography on the internet. Young people may masturbate in private and experiment sexually with the same age group.

Appendix 2

Brooks Sexual Behaviours Traffic Light Tool

Sexual behaviours in children and young people can be seen on a continuum ranging from 'normal' and developmentally appropriate, through 'inappropriate' and 'problematic', to 'abusive' and 'violent'.

Brook's nationally recognised Sexual Behaviours Traffic Light Tool provides a highly visible, multi-agency response that helps professionals to identify, understand and respond appropriately to sexual behaviours in young people.¹ The behaviours identified in the tool are examples used to show the differences between healthy and unhealthy sexual development and distinguish it from harmful behaviour.

The resource does not aim to define how children and young people should behave, but to show which behaviours are a natural part of growing up and exploring sexuality, and which are problematic and may need intervention or support.

Assessing what is 'normal' behaviour at each developmental stage is not straightforward, and needs to take the social, emotional and cognitive development of the individual child or young person into account. Put simply, some behaviours that are normal in young children are concerning if they continue into adolescence; other behaviours, normal in adolescence, would be worrying in younger children. Behaviour outside the normative range may be called 'harmful', because it is harmful to others or to the child or young person themselves. It may range from activities that are simply inappropriate in a particular context to serious sexual assault.

¹https://www.proceduresonline.com/manchester/cs/user_controlled_lcms_area/uploaded_files/Brook%20Traffic%20Light.pdf

Appendix 3

What is harmful sexual behaviour?

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive.

It can be displayed towards younger children, peers, older children or adults. It is harmful to the children and young people who display it, as well as those it is directed towards.

In addition, sexual behaviour between young people, where one of the pair is much older can be considered harmful (especially if there is more than two years difference, and if one is pre-pubescent and one is not). However, a younger child can still harm an older child.

Harmful sexual behaviour can include young people using sexually explicit words or phrases, inappropriate touching, using sexual violence or threats, penetrative sex with other children/young people.

Harmful sexual behaviours can take place between children of any age and sex, both offline and online

Concerns to watch out for:

- Behaviour that is developmentally or socially unexpected, or not appropriate to the context.
- Behaviour that's not consensual or reciprocal.
- Behaviour that upsets other students.
- Victimising someone else.
- Behaviour involving violence, coercion or force.
- Intrusive behaviour.

If staff see any of these red flags for potential harmful sexual behaviour, they should report it to the safeguarding team.

Harmful sexual behaviours can also be an indicator of abuse, so it is doubly important to share concerns – to protect both the student showing the behaviour, and those who may be showing harmful sexual behaviours towards

Appendix 4

What is sexual harassment?

Sexual harassment is defined in the Equality Act 2010 as unwanted conduct of a sexual nature, which has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

For the purpose of this procedure when sexual harassment is referenced it is in the context of student on student sexual harassment.

Sexual harassment is likely to violate a young person's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes (we should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim)
- displaying pictures, photos or drawings of a sexual nature
- online sexual harassment which may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence – and comprises
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos (taking and sharing nude photographs of U18s is a criminal offence) sharing of unwanted explicit content
 - upskirting (this is a criminal offence)
 - sexualised online bullying
 - unwanted sexual comments and messages, including, on social media
 - sexual exploitation, coercion and threats.²

Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to **sexual violence**.

² Revisit [Spotlight Bitesize Training – Sexting Nov 2021](#)

Appendix 5

What is sexual violence?

When referring to sexual violence we are referring to sexual offences under the *Sexual Offences Act 2003* as described below:

Rape: A person (A) commits an offence of rape if: they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. **We should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.**

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)