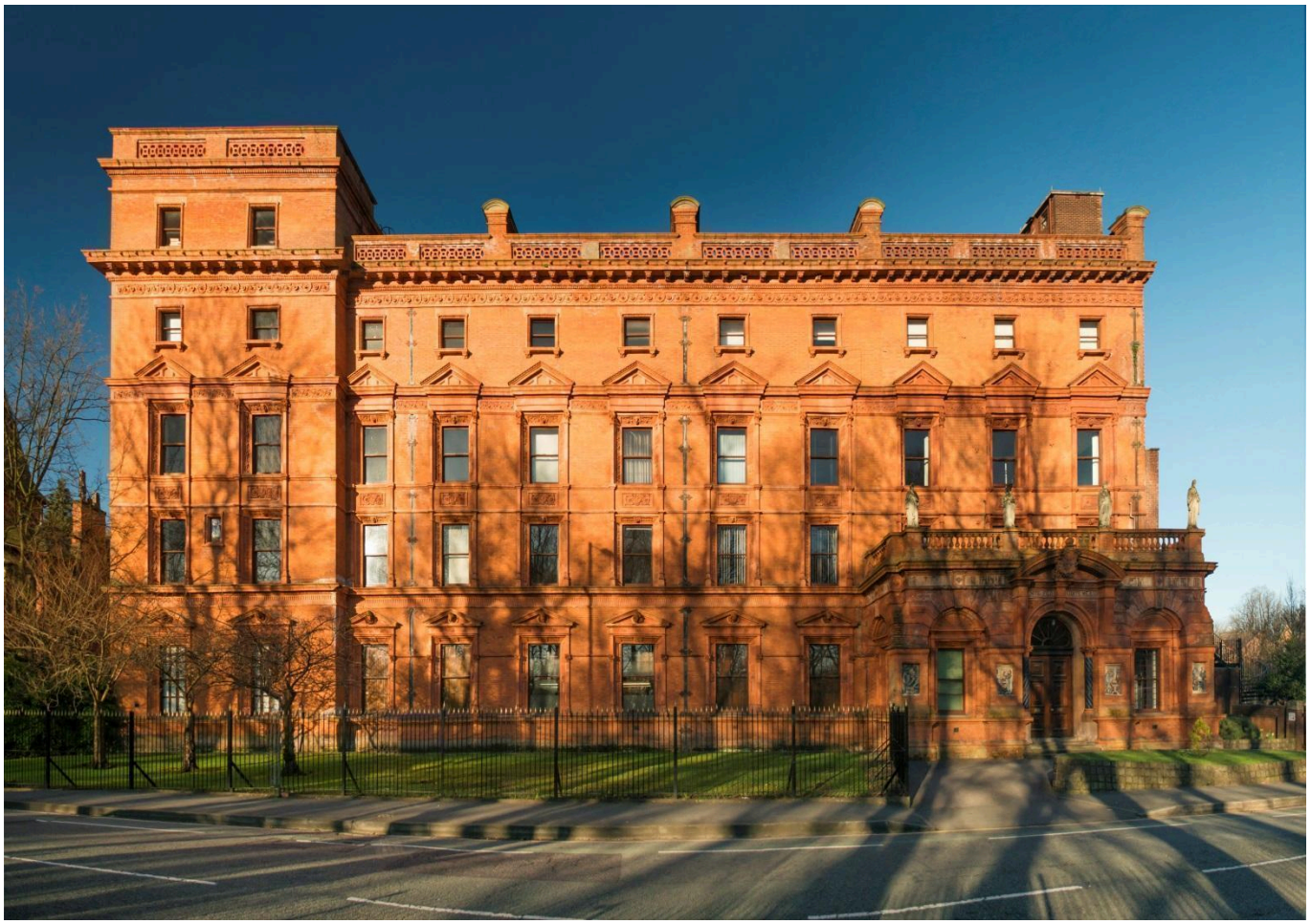
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HARMFUL SEXUAL BEHAVIOUR POLICY



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Harmful Sexual Behaviour Policy

As the NSPCC explains "*children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour. As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is harmful sexual behaviours or HSB.*" This term has been adopted widely in the field, and is used throughout the NSPCC's, Research in Practice's and Professor Simon Hackett's harmful sexual behaviour framework.

Sexual harassment and sexual violence can be grouped into:

Non-contact forms, but face-to-face

- Sexist name calling
- Rumours about sexual activity
- Unwanted or inappropriate comments of a sexual nature

Non-contact forms, not face-to-face

- Being sent pictures or videos they did not want to see
- Being put under pressure to provide sexual images of themselves
- Having pictures or videos that they sent being shared more widely without their knowledge or concern
- Being photographed or videoed without their knowledge or consent
- Having pictures or videos of themselves that they did not know about being circulated

Contact forms

- Sexual assault of any kind
- Feeling pressured to do sexual things that they do not want to
- Unwanted touching

For the purpose of the College's child-on-child abuse policy, harmful sexual behaviours are defined *as 'Sexual behaviours expressed by children...that are*

developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child…or adult,' Hackett 2014. All sexual behaviour falls on a continuum and assessment and intervention frameworks can be helpful in assessing where any given behaviour falls on a continuum. College staff will use the Hackett continuum in placing sexual behaviours. Sexual violence and sexual harassment can occur between two children of any age and sex from the Prep School through to Sixth Form, staff should always maintain an attitude of 'it could happen here.' Staff should use their professional judgement, discussing any concerns with the DSL.

Recognising sexualised behaviour

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

Sexual behaviours sit on a continuum that ranges from developmentally typical, to problematic and harmful. Some sexual behaviours are a normal part of a child's sexual development. It is important staff know what behaviours are healthy to avoid an over-reaction. Not all sexual behaviours are something the College needs to worry about. Context is key; the same behaviour can sit in different places on the continuum due to different contexts. Is the behaviour group based? Is it due to peer pressure? Are there underlying misogynistic, sexist, or discriminatory attitudes involved? Does it present a risk of harm to others?

College staff will use the Hackett continuum to group sexual behaviour into;

- **Green**, or developmentally typical, these are consensual activities displayed between children of a similar age or developmental ability and reflect normal curiosity.

- **Amber**, or problematic behaviour, these are outside safe developmental activities. They may be unusual for the age or developmental development of the child, or because of the activity type, frequency, duration or context they occur.

- **Red**, meaning harmful behaviour, these are outside safe and developmental typical activities. They may be excessive, secretive, compulsive, coercive, degrading or threatening and / or involve a power differential or be of concern due to the type of activity. In addition to the Hackett continuum, trained staff such as the Designated Safeguarding Lead or Deputy DSLs, may use the Brook Traffic Light Tool.

The College does not solely rely on disclosures to action HSB. Pupils also have a digital Safeguarding reporting tool on their Chromebooks.

Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children, such as assumptions that a change in behaviour or indicators of possible abuse are solely down to the child's disability. The potential for SEND children to be impacted by child-on-child abuse, without showing any visible signs. Communication barriers can also make disclosures difficult. Therefore any report of abuse involving children with SEND requires close liaison between the DSL and deputies and SENCO.

Responding to Sexualised Behaviour

The best responses to child sexual violence and harassment are those which take a whole school or college approach to safeguarding and child protection. The College maintains and promotes a zero-tolerance approach to sexual violence and harassment and that it is never acceptable. Abuse that occurs online or outside of the College should not be downplayed and should be treated equally seriously.

When there is a disclosure of HSB it is essential that all impacted are reassured that they are taken seriously, regardless of how long it has taken them to come

forward, and that they will be supported and kept safe. An initial response to a report from a child is incredibly important and it can inspire those impacted in the future to come forward. Those impacted should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a person impacted ever be made to feel ashamed for making a report. Victim blaming language, or trivialising the behaviour that has happened must never happen. The behaviour must never be passed off as '*banter*' or just '*boys being boys.*' What is also important is that those impacted are not promised confidentiality, as it will very likely need to be shared further.

When a disclosure has been made it is important that the member of staff listens carefully, reflects back, uses the child's language, is non-judgemental and clear about how the report will progress, not asking leading questions, only prompting the child where necessary with open questions such as where, when, what etc. Whilst leading questions should generally be avoided, staff can ask children if they have been harmed and ask what the nature of that harm was. The impacted should be given as much control as is reasonably possible over decisions regarding any investigation and the support that they will be offered, however, staff should always act in the best interests of the child, even when this is contrary to their wishes.

It is also important for staff to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the impacted may not make a direct report, for example, a friend may make a report or something may be overheard by a member of College staff. If staff have any concerns about a child's welfare they should act on them immediately, rather than wait to be told. They also should not assume that someone else is responding to any incident or concern, if in any doubt they should speak to the DSL.

Any type of sexual behaviour can create an emotive response and it is understandable that staff may feel upset or disgusted by the behaviour. However, all staff must not shy away from responding because of the emotional response or because it is HSB. There needs to be a clear empathetic response, even if they are the instigator.

The College understands that a proper strategy for complaints that does not take a defensive standpoint is vital. The DSL and deputies understand how to run a thorough investigation, especially with regard to interviewing children, ensuring that the staff demonstrate the child is being listened to, that the child is in charge

of the conversation and that they are reassured and treated with empathy. Where the report includes an online element, staff should refer to the College Making and Sharing Nudes and Semi-nudes Policy. Staff must **never view, download, copy, or forward** images of a child.

Language regarding HSB is important, the College will use the terms 'instigated' and 'impacted' rather than 'perpetrator' and 'victim'. This is not to minimise the action that has happened, but to focus on the behaviour, rather than labelling the young person.

Just as sexual behaviour sits on a continuum, so do the responses to HSB. The options the College will usually take are:

MANAGE INTERNALLY – In some cases the College will decide that the incident can be managed internally, for example, in the case of one-off incidents. Where the impacted and instigated are not in need of family help or require referrals to be made to statutory services, utilise the College behaviour and child-on-child abuse policies. This will be underpinned by the College stance that there is a zero-tolerance approach to HSB and it will not be tolerated. All decisions will be recorded on the College CPOMs system.

EARLY INTERVENTION – In other cases the College may decide that referral to statutory services is not required, but they may benefit from early intervention. Early intervention means providing support as soon as a problem emerges in a child's life. Early intervention and the option to manage internals do not need to be mutually exclusive, and the College could manage internally, but also seek support for some or all involved through universal services.

REFERRAL TO CHILDREN'S SERVICES – Where a child has been harmed, is at risk of harm, or in immediate danger the College should make a referral to local children's services. At the point of referral parents will be made aware, unless the College feels that by making parents aware this will put those involved in further danger. The College will not wait for the outcome before supporting those involved and protecting the impacted.

REPORTING TO THE POLICE – Any report to the police will be in parallel with a referral to children's social care. Where a report of sexual assault is made, the starting point is this should be passed on to the police. The College will work with

the police and agree on when and what information can be disclosed to staff and others, particularly the instigated and their parents. Again, the College will not wait for the outcome before supporting those involved and protecting the instigated.

When a pupil demonstrates green sexual behaviours, this is developmentally typical, age-appropriate behaviour, this does not mean the behaviour will be ignored. Just because a behaviour is deemed developmentally typical, does not mean that it does not require a response. It may be that a behaviour is green, however, due to where it is taking place it is not appropriate. Some responses to developmentally appropriate behaviour that the College may take are:

- Appropriate relationship and sex education.
- Acknowledge some behaviour is typical but not acceptable within a school.
- Online safety awareness.
- Activities that promote healthy relationships.

Addressing inappropriate behaviour, even if it could be considered relatively minor, can be an important intervention as it helps create the correct culture and prevent HSB in the future.

When the College needs to discuss instances of HSB they will always try to meet the parents face-to-face, rather than discussing over the phone. This is so that the College can discuss what support is to be put in place for those who are impacted, and to discuss any sanctions or support with those who have instigated the behaviour. This may not always be possible due to geographical constraints, or when discussing ongoing cases.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child is in need of help or may have been abused by someone else and this is a cry for help. In such cases a referral to children's services may be appropriate. If a report is shown to be deliberately invented or malicious the College will consider whether any disciplinary action is appropriate against the individual who made the report.

The making or sharing of nudes or semi-nudes

Whilst professionals have previously referred to the issue as 'sexting' there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.' Yet, recent NSPCC

research has revealed that when children are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know.' Similarly, a recent ChildLine survey has revealed that many parents think of sexting as flirty or sexual text messages rather than images.

The OFSTED Review of sexual abuse in schools and colleges, June 2021, found that online sexual abuse was much more prevalent than adults realise. For example, nearly 90% of girls, and nearly 50% of boys, said being sent explicit pictures or videos of things they did not want to see happens a lot or sometimes to them or their peers.

What is the making or sharing of nudes or semi-nudes?

The College uses the statutory term 'making or sharing nudes and semi-nudes' (formerly referred to as youth-produced/involved sexual imagery or 'sexting') to describe these behaviours, because:

- 'Making or sharing' encompasses children creating, taking, sending, requesting, receiving, or forwarding images or videos. This applies whether the content involves themselves or another child, and whether it was shared consensually, under coercion, or without consent. It explicitly includes content created, modified, or generated using artificial intelligence (AI), deepfake technology, or digital editing tools.

- 'Nudes and semi-nudes' is the standard term used in DfE and UKCIS guidance and is the phrasing most clearly understood by children and young people. It covers still photographs, moving video footage, saved media, and live streams.

- 'Sexual context and professional judgement' replacing vague terms like 'indecent' ensures clarity. The DSL will use professional judgement alongside UKCIS assessment tools to evaluate the context, potential power imbalances, and severity of the content without ever viewing, copying, or downloading the actual image or video.

Disclosure

Disclosure about making or sharing nudes or semi-nudes can happen in a variety of ways. The child affected may inform a class teacher, the DSL in School, or any member of the School staff. They may report through an existing reporting

structure, or a friend or parent may inform someone in College or a colleague or inform the police directly. There is also a possibility that a member of staff may be made aware of an image in circulation by other students not involved in either the production or initial transfer, but who have become exposed to the imagery as a result of wider distribution.

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving making or sharing nudes or semi-nudes. Staff should also be aware of the legalities around making or sharing nudes or semi-nudes so they can best inform students in their care – messages such as "*it's illegal*" are not considered to be helpful (for reasons explained below). This should be covered within staff training and within the School's Child Protection policy.

Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in College is a last resort and they may have already tried to resolve the issue themselves. When the College is alerted to an incident of making or sharing nudes or semi-nudes it will again give the instigated and impacted an emotive response, that does not seek to blame or judge the child.

Handling incidents

All incidents of making or sharing nudes or semi-nudes should be responded to in line with the College's child protection and child-on-child abuse policy. When an incident involving making or sharing nudes or semi-nudes comes to a member of staff's attention they should immediately report the incident to the DSL. The DSL will consider the following points to determine what the appropriate response and outcomes should be:

- Does the College have concerns about the child's vulnerability?
- Was the image shared? Was it consensual, or was the child coerced or put under pressure?
- Has the image been shared beyond its intended recipient? Was it shared without the consent of the child who produced the image?
- Has the image been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread of the image?
- How old is each child involved?
- Has the image been sent to more than one person?
- Does the child understand the possible implications of sharing the image?

- Would there be additional concerns if the parents or carers were informed?

The DSL should hold an initial review meeting with appropriate School staff, and there should be subsequent interviews with the children involved. The College will seek to categorise the incident of making or sharing nudes or semi-nudes:

AGGRAVATED INCIDENTS

1. **Adult offender** – An incident with any adult involvement.
2. **Youth only: intent to harm** – Incidents arising from conflicts such as break-ups, this could involve blackmail, threats, or deception, and / or involve sexual abuse or exploitation.
3. **Youth only: reckless misuse** - No intent to harm, but images are shared thoughtlessly or recklessly without the knowing or willing participation of the person pictured.

EXPERIMENTAL INCIDENTS

1. **Romantic** - Young people in ongoing relationships make images for themselves or each other.
2. **Sexual attention seeking** - Sent between young people who were not known to be romantic partners, with no intent to cause harm or abuse.
3. **Other** - Incidents without aggravating elements that do not fit the romantic or attention-seeking sub-types (e.g., young people taking photos of themselves without sending them, or pre-adolescent children under 9 with no sexual motives).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately. Any report to the police should be considered against the severity of the concerns and/or allegations, the impact on any child who has allegedly experienced the abuse, and the broader context of the production and distribution of the image. Aggravated incidents should always involve a referral to children's social care.

Depending on the facts of the particular concern or allegation, a report to the police does not necessarily mean that the child will be criminalised. Since January 2016, the police are able to record an "Outcome 21" against a reported crime, meaning it is not in the public interest to pursue a charge. The majority of making or sharing nudes or semi-nudes would fall into this category. However, in the

event of coercion, exploitation, further harm or aggravated behaviours, it is valid for police involvement to result in criminal charges.

The College recognises that speaking to parents is vitally important. The College will be specific and clear on what has happened and the impact it has caused. The College recognises this may be distressing for the parents and that they may need support. The College will seek to help the parents to explore why the child is displaying this behaviour. The College will ask parents to respect confidentiality and ask that no information is shared, either online or offline, about the incident. The College recognises that it is better to speak to parents face-to-face rather than over the phone, however, this may not always be possible. The College will discuss the next steps and opportunity for support, as well as any reports that need to be made to the local authority.

The DSL will always follow the procedures and guidance set out in *Sharing nudes and semi-nudes,* UKCIS, March 2024.

Education
Teaching about safeguarding issues in the classroom can prevent harm by providing children with skills, attributes and knowledge to help them navigate risks. The College will provide children with opportunities to learn about the issue of making or sharing nudes or semi-nudes, as part of its commitment to ensure that they are taught about safeguarding, including online, through teaching and learning opportunities – as also referred to in the College's Online Safety policy. Children will be encouraged to share concerns with staff and will be told, for example, that there are ways of removing images from the internet if they are reported quickly. For further details, please see the College's Making and Sharing Nudes and Semi-nudes Policy.

Recording Sexualised Behaviour

Effective recording of HSB is vital as it

- facilitates accurate assessment, action and safety planning.
- Avoids under – or over – estimating risk.
- Helps to identify whether behaviour is escalating or becoming more frequent.
- Evidences and informs proportionate decision making, guides action.
- The person who witnessed the behaviour should complete the form and let the DSL know.

Staff will ensure when they are logging any incidents of HSB that they are specific and record incidents in a non-judgemental way. Vague statements can really impact on placing behaviours on the continuum and referring any incidents on to the DSL.

Staff will endeavour to record incidents as soon as possible, even in rough, and then log on CPOMs as soon as possible afterwards, staff should log incidents quickly as one can quickly forget or confuse detail. Staff should refer to the Hackett continuum and the language used within it for guidance on recording incidents of HSB, recording them as HSB, rather than a serious incident. Staff should use professional judgement and discussions with the DSL about whether to record green behaviours. Staff should use the words used by the instigator, and not be tempted to soften the language. The location of HSB is important to note for future reviewing and this should always be recorded in instances of HSB. It is important that staff distinguish between fact and opinion, opinion can be valuable, however it is important that it is clear that it is an opinion.

College termly Safeguarding Meetings include analysis of all occurrences of HSB, including online, to identify patterns and problematic locations. This is also important to allow the College to intervene early to prevent future abuse.

Managing Sexualised Behaviour

Sanctions
There are a wide variety of sanctions that can be used for those to instigate HSB, examples include fixed-term exclusions, internal removal from lessons, detentions, or removal of privileges. Disciplinary action can be taken whilst other investigations by the police and/or children's services are ongoing. The fact that another body is investigating an incident does not in itself prevent the College from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a sanction accordingly.

Safety plans
In deciding (a) whether a safety plan would be appropriate; and (b) which children require a safety plan, the DSL should consider:

- the extent to which a child may have experienced or otherwise been affected by the alleged behaviour, and the impact on them. This will depend

not only on the child's involvement in or proximity to the alleged behaviour, but also on factors such as their possible wider circumstances and needs, their age and understanding, and the extent to which the alleged behaviour might trouble or distress other children, or expose them to inappropriate sexual behaviour,
- the importance of early intervention to address and to prevent escalation of inappropriate and/or problematic behaviours, and
- whether there are any wider safeguarding concerns about a child – for example, where a child's behaviour may be considered to be inappropriate or problematic on Hackett's continuum, or at risk of escalating, the DSL and/or external agencies may determine that a safety plan is required to control emerging risks.

In all cases where a safety plan is not considered to be appropriate, the school should nonetheless take steps to safeguard and support the/each child who is allegedly responsible for the behaviour, and any children affected by it, and should continue to monitor the situation. If risks increase consideration should again be given to developing a safety plan. A safety plan should be developed in consultation with key statutory agencies to whom any referral and/or report is necessary.

In developing a safety plan the school should ensure the plan:

- is proportionate and does not stigmatise the child/children involved
- addresses concerns and helps reduce risk, both specifically and more widely
- is completed with the wider professional network and with parents/carers
- reflects the child's view and gives the child an explanation of the plan: it is important that the child receive positive messages about the plan and positive behaviour is supported
- is reviewed approximately every three months, or if/when concerns or risks change
- includes recommended outcomes, such as preventative work, generic work, or understating body-boundaries
- allows for other/future incidents to be recorded
- is in line with the NSPCC Harmful sexual behaviour framework (Hackett, Branigan and Holmes, 2019)

A safety plan should:

- set out relevant background information – including an overview of the context, the specific concern(s) or allegation(s), any relevant detail about the relationships, and any power differentials between the child/children allegedly responsible for the behaviour, and any children affected by it, the frequency of the alleged behaviour and any changes in it over time. Details should also be shared of action taken regarding the alleged concern(s) or allegation(s), and any advice provided by children's social care, and/or other relevant agencies
- set out any relevant information regarding the child/ children concerned. For example, any relevant medical information, any previous concerns about the child's/children's behaviour, needs or harm that the child/children may have been exposed to in the past. Information should be shared on their wishes and feelings regarding the proposed safety plan.
- identify and assess the nature and level of risk that is posed and/or faced by the child/children in school such as that which may arise in relation to locations, activities, contact with particular students, or transport arrangements to and from school; and contexts outside the school, including at home, in relationships with friends, peer groups, interactions in the neighbourhood and/or during online activity,
- set out the steps and controls that can be put in place to reduce or manage any risk. Issues that may be addressed include:
    - how safety will be ensured in the classroom, out of the classroom, on transport, and during unstructured or co-curricular activities, including trips and residential stays away from school. This may involve separating the child/ children who present risk from other children who may be affected by the alleged child-on-child abuse,
    - how to ensure that the child/children reportedly affected by the alleged behaviour feel(s) supported, including by appointing a trusted member of staff with whom they can speak if they have existing concerns or if there are any future developments which cause them concern,
    - how best to draw on any other trusting relationships where these exist, and create them where they do not, to provide the children concerned with support and a sense of belonging,
    - where relevant, how to manage the child's/ children's behaviour – this can be done in a number of ways including, for example, by way of a de-escalation plan for staff which identifies any triggers,
    - whether the behaviour is of such high risk that suitable controls cannot be put in place within the school setting which would enable it to be adequately managed. In this case consideration will need to

be given to alternative plans for the child/children presenting the alleged behaviour.

- identify and consider how to build on strengths and positive aspects that the/each child possesses and/or is exposed to, such as those emanating from activities or lessons that the child enjoys and engages with; positive characteristics and skills that the child possesses; and/or trusting relationships with the child's family, other students or staff,
- include the child and parents views regarding the child's sexual behaviour and other concerns
- be reviewed at regular intervals, or if there is a change in perceived risks or circumstances. Reviews should be carried out in light of the children's ongoing needs to ensure that real progress is being made which benefits the children concerned. If at any stage the risk increases, there is a further alleged incident, or any individual child's needs escalate, the DSL should contact children's social care, and/or other relevant agencies, to determine the appropriate course of action. In the event that any new information is disclosed at any time indicating a child may have been harmed, is at risk of harm, or is in immediate danger, the school should make a new referral to children's social care and, if appropriate, report to the police.

Support

In addition to sanctions, support to the instigated and impacted can prevent future incidents and tackle any underlying causes of harmful sexual behaviour. These include the school counsellor, pastoral support, educative approaches and the involvement of families and social care and external agencies. The College recognises that in some cases this support will need to be long term.

One impacted by sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While the College does not want to isolate those impacted, in particular from peer groups which can act as a support, there may be times when a full timetable of lessons is not deemed to be in the child's best interest. This will always be because the impacted wants to in order to better manage the situation.

Taking disciplinary actions and still providing appropriate support are not mutually exclusive actions. They can, and will occur, at the same time as necessary. The correct support may be necessary to stop the instigator re-offending and address any underlying trauma that may be causing this behaviour. The College understands that following allegations of HSB there is an increased risk of

self-harm and suicide amongst those who have been accused, therefore comprehensive support of all those included in incidents is vital. The College will do everything it reasonably can to protect not only the impacted, but also the instigator(s) from any bullying or harassment as a result of the report that has been made. A child abusing another child may also be a sign that they have been abused themselves or a sign of side issues that require addressing.

The College will also give consideration to supporting children who have witnessed HSB.

Relationship and Sex Education

The importance of RSE cannot be underestimated in creating a culture where HSB is not tolerated. A curriculum-based approach to tackle a culture where reporting is perceived as 'snitching,' is best achieved in the small group setting of PSMEE and RSE lessons. The OFSTED report into HSB acknowledged that pupils benefit from small group discussions. The Safeguarding Team regularly audit the PSMEE curriculum and survey pupils to gauge the effectiveness of lessons. These allow the curriculum to reflect current issues of concern for young people in a language they use and recognise. External experts are also invited into the College to speak to pupils about the issues relating to HSB.

In RSE pupils tackle such issues as:

- healthy and respectful relationships
- what respectful behaviour looks like
- consent
- body confidence and self-esteem
- identifying and challenging prejudiced, sexist, or misogynistic behaviour
- that sexual violence and harassment is always wrong

Parents are included in the teaching of RSE. The College uses the TenTen program and parents have access to a parent education module, access to which is shared with parents annually.

Pupil Voice

The correct culture cannot be brought about by adults alone. Pupil voice is vital and at the forefront of College responses to HSB. The College regularly survey pupils on HSB and it is included in pupil voice meetings.

Staff training

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Staff training regarding HSB is something that the College takes very seriously. HSB is included in the new staff Safeguarding induction, as well as the annual Safeguarding update. Staff will also have specific training at strategic points in the academic year on HSB. Every year staff training will include:

- the College definition of sexual harassment and sexual violence, Hackett 2014
- how to identify early signs of child-on-child abuse
- how to consistently uphold standards in their responses to sexual harassment and online sexual abuse
- understand the prevalence of HSB in schools
- know good practice when handling disclosures and support children

The College-wide definition of HSB, along with the Hackett continuum, are also in the Staff handbook, which is given to all members of staff and updated annually.

Staff also have access to high-quality training in the teaching of RSE provided by the Catholic Education Service. Annual Safeguarding training also includes the delivery of successful RSE lessons.

The DSL and selected deputies also undertake further HSB training, including the NSPCC managing sexualised behaviour in secondary schools and the Brook Traffic Light Tool. These are specifically trained staff to deal with HSB. Governors all undertake Safeguarding training, and this includes specific training on HSB. There is an appointed Safeguarding governor, who meets with the DSL at least once a term, which involves reviewing incidents, policies and procedures relating to HSB.

Agreed by:	Chair of Governors and Governing Body
Date:	September 2021

Effective date of the policy:	September 2021,
Reviewed	September 2022, September 2023, September 2024, Sept 2025, Sept 2026
Date of following revision:	September 2027

Appendix I – Support for schools and colleges

- **Part one of** Keeping Children Safe in Education and What To Do If You're Worried a Child is Being Abused (DfE) provides information for all staff on indicators to look out for and advice on what they should do if they have concerns about a child.

- **The police** will be important partners where a crime might have been committed. The following advice may help schools and colleges decide when to engage the Police and what to expect of them when they do: When To Call the Police.

- Child Exploitation and Online Protection command: CEOP is a law enforcement agency which aims to keep children and young people safe from sexual exploitation and abuse. Online sexual abuse can be reported on their website and a report to one of their Child Protection Advisors.

- **The NSPCC** provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies).

- Support from **specialist sexual violence sector organisations** such as Rape Crisis or The Survivors Trust.

- **The Anti-Bullying Alliance** has developed guidance for schools about Sexual and sexist bullying.

- **The UK Safer Internet Centre** provides an online safety helpline for professionals at 0344 800 2382 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for school and college staff with regard to online safety issues and will be especially useful for the designated safeguarding lead (and their deputies) when a report of sexual violence or sexual harassment includes an online element.

- **Internet Watch Foundation**: If the incident/report involves sexual images or videos that have been made and circulated online, the impacted can be supported to get the images removed by the Internet Watch Foundation

(IWF). The IWF will make an assessment of whether the image is illegal in line with UK Law. If the image is assessed to be illegal, it will be removed and added to the IWF's Image Hash list.

- Childline/IWF: Remove a nude image shared online *Report Remove* is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

- **UKCIS Sharing nudes and semi-nudes advice**: Sharing indecent images of a child (including by children) is a crime. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides support in responding to reports of children sharing non-consensual nude and semi-nude images and or videos (previously known as sexting and youth produced sexual imagery).

- Thinkuknow from NCA-CEOP provides support for the children's workforce, parents and carers on staying safe online.

- **Shore Space:** A dedicated, safe online resource run by *Stop It Now!* for children and young people who have concerns about their own or someone else's sexual behaviour (shorespace.org.uk).