



## PA001: Peer on Peer Abuse, Sexual Harassment & Anti-Bullying Policy

SMT owner	DHP
Reviewed by SMT	January 2025
Effective from	March 2025
Next review	January 2026
Governor approval (Y/N)? Approved by Board of Governors (if Y)	Y

### References

The Human Rights Act 1998  
The Equality Act 2010.  
[www.gov.wales/school-bullying](http://www.gov.wales/school-bullying)  
The Independent School Standards (Wales) 2024 Regulations

This policy applies to all pupils, staff, governors and volunteers working in the school, and includes the requirements of the following: WG Guidance document No: 050/2011 and National Assembly for Wales Circular No: 23/2003

### 1. The School's responsibilities

The Governors, SMT, and all Christ College staff are committed to the prevention, early identification and appropriate management of peer on peer abuse (as defined below) both within and beyond the school. This policy is the school's overarching policy for any issue that could constitute peer-on-peer abuse. It relates to and should be read alongside our Safeguarding Policy.

In particular, we:

Believe that all schools should be aware of the nature and the level of risk to which their pupils may be exposed and take a whole-school community approach to preventing and responding to this abuse;

Regard the introduction of this policy as a preventative measure rather than merely as a reactive measure.

For these purposes peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse and coercive control exercised between children.’ (Firmin: Abuse between young people; 2017). Same sex relationships will be treated no differently and the assessment of risk will use the same protocols as for all sexual relationships.

It can take various forms, including (but not limited to)

- Child Sexual Exploitation
- Sexting or youth produced digital imagery
- Upskirting
- Bullying (including online, homophobic, gender or race based)
- Radicalisation
- Abuse in intimate relationships
- Children who display sexually harmful behaviour
- Gang association and serious violence (County Lines)
- Technology can be used for bullying and other abusive behaviour
- Prejudice-based violence including, but not limited to, race and gender-based violence

## 2. Important definitions

### 2.1 Sexual Harassment

This can be defined as ‘unwanted conduct of a sexual nature’ that can occur online and offline. In the context of this guidance this means in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. It 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;

### 2.2 Sexting

The sharing of sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages. This is also known as youth produced sexual imagery.

The UK Council for Internet Safety (UKCIS) Education Group has published Advice for Schools and Colleges on Responding to Sexting Incidents [www.gov.uk/government/publications/sexting-in-schools-and-college](http://www.gov.uk/government/publications/sexting-in-schools-and-college)

### 2.3 Up-skirting

This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment. Cases of 'up skirting' have a mandatory requirement for being reported.

### 2.4 Sexual Violence

This refers to sexual violence in the context of child on child sexual violence. Children can and do abuse other children. Sexual violence covers a spectrum of behaviour. It can refer to sexual offences under the Sexual Offences Act 2013. This includes: - Rape and Sexual Assault.

### 2.5 Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. It is important to know that a child under the age of 13 can never consent to any sexual activity;

#### - **Young people between 13 and 16**

The Sexual Offences Act 2003 recognises that whilst mutually agreed, non-exploitative sexual activity between teenagers does take place and that often no harm comes from it, the age of consent remains at 16. This acknowledges that this group of young people is still vulnerable, even when they do not view themselves as such.

If sexually active young people in this age group are considered to be at risk by the DSPs, we will follow the school's Safeguarding Policy.

#### - **Young People Between 16 and 18**

Although sexual activity in itself is no longer an offence over the age of 16, young people under the age of 18 are still offered protection under the Children Act 1989.

If sexually active young people in this age group are considered to be at risk by the DSPs, we will follow the school's Safeguarding Policy. Consideration still needs to be given to issues of sexual exploitation and abuse of power in circumstances outlined above. Young people over the age of 16 and under the age of 18 are not deemed able to give consent if the sexual activity is with an adult in a position of trust or a family member as defined by the Sexual Offences Act 2003. Sexual intercourse without consent is rape and is a matter for the police. It is also important to differentiate between consensual sexual activity between children of a similar age and that which

involves any power imbalance, coercion or exploitation, this will include pupils in school where there is a significant difference in age. Due to their additional training, the Designated Safeguarding Person (DSP) or Head will lead the school's response. If in any doubt, they will seek expert advice.

Sexual activity of any kind on school site or during school trips is a breach of school rules.

## **2.6 Harmful Sexual Behaviour (HSB)**

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two. Harmful sexual behaviour should be considered in a child protection context.

## **2.7 Hazing/Initiation**

The practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.

# **3. Contextual Safeguarding**

The context within which incidents and/or behaviours occur should be considered. This is known as contextual safeguarding, which means assessments of children should consider whether wider environmental factors are present in a pupil's life that are a threat to their safety and/or welfare.

When considering harmful sexual behaviour, ages and the stages of development of the child are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is two years' difference. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

We use Simon Hackett's continuum model to demonstrate the range of sexual behaviours (Appendix 1).

# **4. Prevention of peer on peer abuse**

## **4.1 School culture**

Christ College actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by: educating all Governors, Senior Management Team, staff, volunteers and pupils about this issue. This will include;

- the importance of taking seriously all forms of peer-on-peer abuse (no matter how low-level they may appear) and ensuring that no form of peer-on-peer abuse is ever dismissed as horseplay or teasing. Educating children about the nature and prevalence of peer-on-peer abuse via PSE and the wider curriculum;
- Ensuring that all peer-on-peer abuse issues are fed back to the DSP so that they can spot and address any concerning trends and identify pupils who maybe in need of additional support. This is done by way of a weekly Safeguarding meetings and separate weekly Houseparents' meetings at which all concerns about pupils (including peer-on-peer abuse issues) are discussed;
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom);
- Working with all staff and pupils to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community;
- Creating conditions in which our pupils can aspire to and realise safe and healthy relationships;
- Creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to;
- Responding to cases of peer-on-peer abuse promptly and appropriately.

#### 4.2 Pupils

All pupils are briefed thoroughly on the school's expected standards of behaviour.

A proactive approach is employed to complement the strategies for dealing with incidents. This is underpinned by our pastoral support system, and by our programme of wellbeing education delivered through the whole curriculum. Issues covered include, but are not limited to;

- Healthy and respectful relationships;
- What does respectful behaviour look like?
- Consent;
- Gender roles, stereotyping, and equality;
- Body confidence and self-esteem;
- Prejudiced behaviour;
- Tackling cultures of sexual harassment

We use appropriate assemblies to explain the school policy on peer on peer abuse. Our Chapel and PSE programme is structured to give pupils an awareness of their social and moral responsibilities as they progress through the school. The programme is structured to enforce messages about community involvement and taking care of each other;

All pupils know how to report anxieties to their Houseparent, the Designated Safeguarding Person (DSP) or to another member of the pastoral team. All pupils are made aware of online/telephone support -

Childline (0800 1111). The telephone number of the school's Independent Listener is posted in all houses and on school display boards. Our Welfare Centre, our boarding houses and day hubs display advice on where pupils can seek help, including details of additional confidential help lines and websites connecting to external specialists.

We provide leadership training to our School and House Prefects which specifically covers the importance of offering support and assistance to younger and to vulnerable pupils; and Houseparents remain alert to any signs of peer-group hazing in the houses.

#### **4.3 Staff**

- Our pastoral team gives support and guidance to other staff on handling and reporting incidents, and on the follow-up work with both victims and bullies. Inset sessions are held regularly;
- Our trained Pupil Counsellor is an important part of our pastoral support service, providing specialist skills of assessment and counselling. She is available to give advice and counselling support to pupils who can refer themselves to her via the Welfare Centre staff when they have social, emotional or behavioural concerns.
- In boarding houses, there are strong teams of tutors supporting the Houseparents who act in loco parentis. The informal house environment is important in reinforcing a pupil's standards and values, providing the opportunity for friendly, informal discussion of matters of concern to the individual pupil outside the formal classroom.
- All reported incidents are recorded and investigated at once. We always monitor reported incidents. Records of incidents are kept securely in the office of the Deputy Head (Pastoral) in order that patterns of behaviour can be identified and monitored;

#### **4.4 Parents**

- We encourage close contact between the Houseparents and parents/guardians, and will make contact if we are worried about a pupil's wellbeing; and
- We welcome feedback from parents and guardians on the effectiveness of our preventative measures and all other aspects of pupil wellbeing. We encourage parents to work collaboratively with the school to find the best way forward for all pupils.

### **5. Online peer on peer abuse**

#### **5.1 Definition**

Online peer-on-peer abuse is any form of peer-on-peer abuse with a digital element, for example sexting, online abuse, coercion, grooming, the distribution of sexualised content and harassment.

Cyberbullying can be defined as "the use of information and communication technologies to support deliberate, repeated, and hostile behaviour by an individual or group that is intended to harm

others" (Belsey, [www.cyberbullying.org](http://www.cyberbullying.org)). It is an aggressive, intentional act, often against a victim who cannot easily defend himself/ herself. Online abuse could involve communications by various electronic media, including for example:

- Texts, instant messages or calls on mobile phones;
- The use of mobile phone camera images to cause distress, fear or humiliation;
- Posting threatening, abusive, offensive or humiliating material or comments on websites (including blogs, personal websites and social networking sites such as Facebook, Instagram, X [formally Twitter], TikTok, Snapchat or YouTube);
- Using social media to message others in a threatening or abusive manner; or
- Cloning social media accounts.

## **5.2 Online peer on peer abuse - preventative measures**

In addition to the measures described in pages 5&6, Christ College:

- Provides a programme of information sessions by year group delivered by professionals from the police and other agencies covering the educational, moral and legal angles of peer group relationships;
- Offers guidance on the appropriate use of technology;
- Expects all pupils to adhere to its Acceptable Use Policy. Certain sites are blocked by our filtering system, access times are restricted and our IT Department and Designated Safeguarding Person are able, when required, to monitor pupils' use;
- May impose disciplinary sanctions for the misuse, or attempted misuse, of the internet and social media;
- Issues all pupils in years 7-13 with their own personal school email address;
- Does not allow the filming of others without their permission.

## **6. Procedures for dealing with a report of peer on peer abuse**

In cases where peer on peer abuse is identified we will follow our procedures, taking a contextual approach to support all children and young people who have been affected by the situation.

Some of these behaviours will need to be handled with reference to other policies in school such as the behaviour policy and/or the safeguarding policy.

Christ College ensures that all instances of or concerns about bullying and online bullying on and away from school premises are recorded properly. Records of instances of bullying and allegations of bullying will be kept by the Deputy Head (Pastoral). The school will also use this information to identify patterns of behaviour and locations of incidents (hotspot maps) to evaluate the effectiveness of our systems. If an incident of peer on peer abuse is reported, the following procedures will be adopted:

- i. The member of staff to whom it was reported, or who first discovers the situation, will control the situation, reassure and support the pupils involved;
- ii. He/she will inform an appropriate member of staff as soon as possible;
- iii. The staff member concerned will convene a meeting as soon as possible with the Houseparent of all parties to determine who will take responsibility for which elements of the investigation;
- iv. The victim will be spoken to and may be asked to write an account of events if appropriate;
- v. All others who were involved, will be spoken to as soon as possible and may be asked to write an account of events if appropriate;
- vi. The incident should be recorded by completing a signed and dated 'Incident Report Form' which is then given to the Deputy Head (Pastoral) who is responsible for keeping all records of bullying and other serious disciplinary offences securely;
- vii. Once the basic facts have been established and the Houseparents and/or Deputy Head (Pastoral) is confident they have sound knowledge of the issue, parents of both the alleged victim and the alleged perpetrator should be informed without delay, ideally by phone. It is good practice to inform parents of the next steps in concluding the investigation and the possible outcomes for the alleged perpetrator. The Deputy Head (Pastoral) will also ensure communication with all relevant staff of both victim(s) and perpetrator/s. In serious incidents, the Head will be informed;
- viii. The victim will be spoken to again at a later stage by a member of the pastoral team, separately from the alleged perpetrator. He/she will be offered support to develop a strategy to help him or herself. It will be made clear to him/ her why revenge or retaliation is inappropriate;
- ix. The perpetrator will be interviewed again at a later stage by a member of the pastoral team, separately from the victim, and it will be made clear why his/ her behaviour was inappropriate and caused distress. He/ she will be offered education, guidance and support on modifying his or her behaviour;

## **7. Bullying**

Bullying is a specific form of peer on peer abuse that will not be tolerated. All forms of bullying are unacceptable at our school and any instances will be recorded and, where appropriate, will result in disciplinary action.

## 7.1 Definition

Bullying can be defined as "behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally" (Guidance for schools on preventing and responding to bullying, Department for Education, July 2017). Put another way, bullying is the intentional hurting, harming or humiliating of another person by physical (including any threat of or use of violence of any kind), sexual, verbal (including via email, social media or other instant messages), and emotional (including by excluding, being sarcastic, name-calling, tormenting or spreading malicious rumours) means. It can involve manipulating a third party to tease or torment someone, or actions that fall short of direct participation, where someone encourages others to bully, or joins in with laughing at a victim. Bullying is often hidden and subtle. It can also be overt and for the purposes of intimidation.

Bullying may involve actions or comments that are sexual or sexist, homophobic, racist, which focus on religion or cultural or family background, special educational needs, disabilities or physical attributes (such as hair colour or body shape). It may also be unpleasant in other ways. Bullying can happen anywhere and at any time and can involve anyone - pupils, other young people, staff and parents.

At Christ College, we always treat bullying very seriously. It conflicts sharply with the school's social and moral principles, and will not be tolerated. Bullying can be so serious that it causes physical, emotional and psychological damage, eating disorders, self-harm and even suicide. No one deserves to be a victim of bullying: everybody has the right to be treated with respect. Pupils who are victims of bullying will be supported. Pupils who have engaged in bullying behaviour will be subject to appropriate disciplinary sanction and will also, where possible, be supported in learning different ways of behaving. Bullying which occurs on school trips will not be tolerated any more than bullying on school premises.

## 7.2 Signs of bullying

Changes in behaviour that may indicate that a pupil is being bullied include:

- Unwillingness to return to school;
- Displays of excessive anxiety, becoming withdrawn or unusually quiet;
- Failure to produce work, or producing unusually poor work, or work that appears to have been copied, interfered with or spoilt by others;
- Books, bags, money and other belongings suddenly go "missing", or are damaged;
- Change to established habits (e.g. giving up music lessons, change to accent or vocabulary);
- Diminished levels of self-confidence

- Frequent visits to the Welfare Centre with symptoms which may relate to stress or anxiety, such as stomach pains or headaches;
- Unexplained cuts and bruises;
- Frequent absence, erratic attendance or late arrival to class;
- Choosing the company of adults rather than peers;
- Displaying repressed body language and poor eye contact;
- Difficulty in sleeping or experiencing nightmares; or
- Talking of suicide or running away from home or school.

Although there may be other causes of some of the above symptoms, a repetition or combination of these possible signs of bullying should be investigated by parents and teachers and reported/recorded as appropriate (see below).

### **7.3 The immediate response to a report of bullying**

The school will take all reports seriously and will reassure the victim that they will be supported and kept safe.

- All staff are trained to manage a report.
- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the DSP or Childrens' Services) staff will however only share the report with those people who are necessary to progress it. A written report will be made as soon after the interview as possible recording the facts as presented by the pupil. These may be used as part of a statutory assessment if the case is escalated later.
- Where the report includes an online element the school or college will follow advice on searching, screening and confiscation. The staff will not view or forward images.
- The DSP will be informed immediately.

### **7.4 Physical Abuse**

While a clear focus of peer on peer abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, may be reported to the police.

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum (Appendix 1) to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- involves a single incident or has occurred over a period of time
- is socially acceptable within the peer group
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability

- involves an element of coercion or pre-planning
- involves a power imbalance between the pupils allegedly responsible for the behaviour
- involves a misuse of power

### **7.5 School's Response**

In deciding what action to take towards the perpetrator, the School will listen carefully to the views of the victim. The School will endeavour to gain the support of all parties in deciding what action to take. The school will take into account any disabilities or additional learning needs of the perpetrator when considering what, if any, disciplinary action is taken. Actions the School will consider, depending on the individual circumstances of the issue, include:

- i. Restorative justice, where reconciliation is sought, education for the perpetrator is instigated and disciplinary sanctions are not required. As part of this process, a meeting involving all the parties, with close staff supervision, may be convened to help develop a strategy which enables all concerned to close the episode;
- ii. If the behaviour is considered to be primarily due to a disability or ALN issue, further reasonable adjustments may be made, and/or a risk assessment produced or updated.
- iii. Disciplinary sanctions in line with the school's policy. Sanctions under the policy include detention, gating, a contract of behaviour or suspension from school. The school may exclude a pupil, either temporarily or permanently, in cases of severe or persistent bullying or if the support put in place for the perpetrator does not result in the modification of behaviour;
- iv. When the course of action towards the perpetrator is decided upon, the Deputy Head (Pastoral) or Head will contact the parents of the perpetrator providing an overview of the issue, what action has been taken and the likely disciplinary consequences of a repeat offence. This communication should also indicate the support, education and guidance the perpetrator will receive in helping direct their behaviour in the future;
- v. As part of the process, a meeting involving all parties, with close staff supervision, may be convened to help develop a strategy which enables all concerned to close the issue and move forwards;
- vi. In very serious cases, and only after the Head has been involved, it may be necessary to make a report to the Police or to Children's Services and guidance set out in the Safeguarding Policy will be followed.

## **8. Multi-agency working**

The School actively engages with outside agencies in relation to peer-on-peer abuse, and works closely with the School's Police Officer, Counselling and Social Services.

**A continuum of behaviours**

It is vital for professionals to distinguish normal from abnormal sexual behaviours. Chaffin, Letourneau and Silovsky (2002, p208) suggest a child's sexual behaviour should be considered abnormal if it:

- occurs at a frequency greater than would be developmentally expected
- interferes with the child's development
- occurs with coercion, intimidation, or force
- is associated with emotional distress
- occurs between children of divergent ages or developmental abilities
- repeatedly recurs in secrecy after intervention by caregivers.

**Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:**

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> <li>• Developmentally expected</li> <li>• Socially acceptable</li> <li>• Consensual, mutual, reciprocal</li> <li>• Shared decision making</li> </ul>	<ul style="list-style-type: none"> <li>• Single instances of inappropriate sexual behaviour</li> <li>• Socially acceptable behaviour within peer group</li> <li>• Context for behaviour may be inappropriate</li> <li>• Generally consensual and reciprocal</li> </ul>	<ul style="list-style-type: none"> <li>• Problematic and concerning behaviours</li> <li>• Developmentally unusual and socially unexpected</li> <li>• No overt elements of victimisation</li> <li>• Consent issues may be unclear</li> <li>• May lack reciprocity or equal power</li> <li>• May include levels of compulsivity</li> </ul>	<ul style="list-style-type: none"> <li>• Victimising intent or outcome</li> <li>• Includes misuse of power</li> <li>• Coercion and force to ensure victim compliance</li> <li>• Intrusive</li> <li>• Informed consent lacking, or not able to be freely given by victim</li> <li>• May include elements of expressive violence</li> </ul>	<ul style="list-style-type: none"> <li>• Physically violent sexual abuse</li> <li>• Highly intrusive</li> <li>• Instrumental violence which is physiologically and/or sexually arousing to the perpetrator</li> <li>• Sadism</li> </ul>

# 1

Responses

# 2

Prevention

# 3

Assessment

# 4

Interventions

# 5

Developments