Anti Child-on-Child Abuse Policy

Review Date	
June 2025	
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August 2025	
Next Review Date	
June 2026	
Responsible Directorate	
Safeguarding and Inclusion	

Our Trust

These four critical questions make it clear who we are and what we do.
We ask ourselves these questions to guide our work and our improvement.

Why do we exist?

To **transform life chances** by achieving the highest possible standards and preparing all our students to lead successful lives.

How do we behave?

- **Hard work**
  We are determined to see things through to the end and are resilient when faced with challenges.

- **Integrity**
  We do the right thing because it is the right thing to do.

- **Teamwork**
  We work together to help everyone succeed.

What do we do?

- We educate, safeguard and champion all our learners.

- We set high standards for ourselves and our learners.

- We build the powerful knowledge and cultural capital which stimulate social mobility and lifelong learning.

How will we succeed?

1. Aligned autonomy

2. Keeping it simple

3. Talent development

Contents

1 | Introduction

1.1 At Academy Transformation Trust we are focussed on creating a culture where respectful relationships between students are expected and there is effective challenge and support where behaviour falls below expectations. Positive, healthy relationships are essential for children to experience a sense of belonging and feel psychologically safe and we will model, explicitly teach and reinforce high expectations about this to the young people in our care. Setting high behavioural standards is key to upholding our Trust's core values and mission statement of transforming lives.

1.2 This policy sets out our commitment to preventing, identifying, and responding to child-on-child abuse and bullying. It aligns with **Keeping Children Safe in Education (KCSIE)** and ensures a proactive, safeguarding-first approach where all forms of abuse are unacceptable and will be taken seriously.

1.3 This policy should be read in conjunction with the Trust's Behaviour Policy, Exclusions and Suspensions Policy, Safeguarding Policy and Complaints Policy all of which can be found on the Academy's website. All policies are available in accessible formats if required.

1.4 Child-on child abuse is referred to as **COCA** throughout this policy. A breakdown of types of COCA is included in the 'definitions' section.

2 | Aims and Objectives

2.1 By having effective procedures for preventing, identifying, and responding to all forms of COCA, including bullying the Trust and its academies aim to:

- Create a culture of respect and inclusivity, ensuring all students feel safe and valued.
- Ensure child-on-child abuse, bullying, and discriminatory behaviour are never tolerated.
- Implement a clear reporting system so that students and staff can confidently raise concerns and receive appropriate support.
- Embed anti-bullying education within the curriculum, including PSHE and RSE, to teach students about respectful relationships, consent, and online safety.
- Encourage positive peer relationships, fostering kindness, empathy, and accountability.
- Ensure all students understand the consequences of harmful behaviour and take responsibility for their actions.
- Provide structured interventions and support for both victims and those displaying harmful behaviours, ensuring appropriate safeguarding and restorative approaches.
- Maintain a safe and supportive academy environment, where students feel comfortable reporting incidents without fear of blame or retaliation.
- Train staff regularly to identify, prevent, and respond effectively to child-on-child abuse and bullying.

- Raise awareness of emotional regulation, helping students manage their emotions and reactions in a healthy way.
- Work closely with parents and carers to reinforce a consistent message about respect and positive behaviour.
- Monitor and review policies and incidents to continually improve safeguarding and anti-bullying practices.
- Promote an approach where all forms of COCA are viewed through a safeguarding lens through which we actively seek to understand the reasons a child may harm others and provide appropriate interventions.

3 | Application of the Policy

3.1   This Anti-Bullying & Anti-COCA Policy applies to all members of the Trust and Academy community, including students, staff, parents, and visitors. The word 'child' in this context is used to refer to anyone under the age of 18 in line with Keeping Children Safe in Education. The policy will be applied to all students regardless of age and adaptions may be made for students in adult learning including contact with local authority services for adults where appropriate. The Trust and its academies are committed to tracking, monitoring, and addressing incidents of bullying and child-on-child abuse through its safeguarding and behaviour management systems.

3.2   The academy will address incidents of bullying, harassment, or harmful online behaviour both within and beyond academy premises when it impacts students' safety and well-being.

3.3   When determining whether it is appropriate to act regarding incidents that occur outside of academy premises, staff will consider:

3.4   Whether the behaviour occurred during an academy-organised activity, on an academy trip, or while the student was travelling to or from academy.

3.5   Whether the student was wearing academy uniform or otherwise identifiable as a member of the academy community at the time of the incident.

3.6   The seriousness of the behaviour, including whether it involved threats, harassment, or harm to another student or child from another academy.

3.7   The potential impact on the academy environment, including whether the behaviour affects the safety, welfare, or emotional well-being of students or staff.

3.8   Whether the behaviour poses a safeguarding risk that requires intervention under the academy's child protection and safeguarding procedures.

3.9   Whether the behaviour could damage the reputation of the academy and/or Trust and undermine the academy's values.

3.10   Where appropriate, disciplinary measures and safeguarding interventions will be implemented, and external agencies (such as the police or children's social care) may be contacted in line with statutory guidance and academy procedures.

4 | Roles and Responsibilities

4.1   This Anti-COCA Policy applies to all members of the Trust and Academy community, including students, staff, parents, and visitors. The word 'child' in this context is used to refer to anyone under the age of 18. The Trust and its academies are committed to tracking, monitoring, and addressing incidents of bullying and child-on-child abuse through its safeguarding and behaviour management systems.

4.2   **Board of Trustees** - The Trustees will work with the Central Team and the academy's Senior Leadership Team to set the ethos and a set of core values that promote high standards of expected behaviour from students attending its academies. Trustees will monitor and evaluate the impact of the policy and will hold the CEO and Principals to account for its implementation. Trustees will ensure that they and local governors receive regular relevant training on anti-bullying and anti-COCA procedures.

4.3   **The Chief Executive Officer** - The CEO will ensure that this Anti-Bullying & Anti-COCA Policy is applied consistently across the academies within the Trust and will report back to the Trustees on strategies, interventions and data in relation to implementation of this policy. They will ensure that senior staff receive regular continued professional development and receive regular training on managing COCA cases.

4.4   **Local Governing Body** - Local governors in each academy will review and monitor the application and implementation of this policy by receiving regular termly reports from the academy Principal on COCA cases at the respective academy. Local governors will scrutinise relevant data and act as a point of challenge for decisions taken by the Principal. Where COCA cases fall disproportionately on any group or groups, they will consider whether any actions should be taken to prevent this.

4.5   **Principal** - Each academy Principal, with support from their respective Senior Leadership Team, will ensure that staff are supported and up to date with policy changes. They will ensure that all staff understand how to identify, report and respond to cases of COCA. They will ensure that any incidents of bullying, discrimination, aggression, and derogatory language (including name calling) are dealt with quickly and effectively. The Principal will monitor how staff implement this policy to ensure COCA cases are managed effectively and do not have a disproportionate effect on students sharing particular protected characteristics.

4.6   **Staff** – All staff will;

- Communicate the contents of this policy to all students and parents to ensure that the Trust's expectations are transparent. Staff deliver these messages through assemblies, tutor time, PSHE lessons, pastoral programmes, welfare checks and as part of induction to the academy (including at non-standard entry points or reintegration).
- Apply this policy fairly, consistently, proportionately, and without discrimination, considering SEND as well as the additional challenges that some vulnerable students may face
- Make reasonable adjustments for disabled and/or SEN students as required

- Model positive behaviour and mutual respect
- Deal with incidents of bullying, discrimination, aggression and derogatory language quickly and effectively
- Record all concerns about unkind, harmful or discriminatory incidents between students on students' safeguarding files.
- Contribute to the development of systems which support and reinforce positive relationships and challenge discrimination.
- Recognise that where a child exhibits harmful behaviour towards others, this can be communication of their own needs.
- Identify students who are experiencing difficulties in developing or sustaining appropriate healthy relationships and put in place general and targeted interventions. This could include welfare checks, more frequent communication with home, interventions to support the development of healthy relationships, SEMH skills or working with external agencies.
- Contact parents or carers, following timelines set out in section 11, where there are concerns about unkind behaviour or COCA or other matters such as attendance where COCA can be an impacting factor.
- Attend and engage with training on anti-COCA strategies and procedures.

4.7   **Parents** - Parents play an important role in ensuring good behaviour from their children. Parents are expected to:

- Support the academy in the application and enforcement of this policy
- Sign and reinforce the Acceptable Use Policy and Home-Academy Agreement
- Inform the academy of any challenging behaviour exhibited at home, special education needs or changes in circumstances that may account for changes in their child's behaviour
- Support the work of the academy to resolve any COCA incidents involving their child
- Attend virtual or in person meetings at the academy with staff to discuss their child's behaviour, including where this involves COCA and adhere to any parenting contracts put in place

4.8   **Students** - Students at our academies are expected to adhere to the following key principles and expectations described in the Behaviour Policy: **Be Safe, Be Kind, Be Respectful, Be Responsible, and Be Inclusive.**

- Students are expected to engage with learning about healthy relationships, anti-COCA and discrimination and contribute to a respectful and inclusive academy environment.
- Students will receive regular education in relation to anti-COCA through assemblies, tutor time, PHSE lessons and induction. This will include how to report concerns, including non-verbal routes available, and what will happen following a disclosure.
- Students are expected to avoid being 'bystanders' and to report concerns to staff where they are aware of unkind, discriminatory or bullying behaviour.

5 | Definitions

5.1   For the purposes of this policy, child-on-child abuse is defined as any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children, and within children's relationships (both intimate and non-intimate), friendships and wider peer associations.

5.2   Child-on-child abuse can take various forms, including, but not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Abuse in intimate personal relationships between peers
- Financial Abuse (Including fraud)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, (physical, verbal and online) such as sexual comments, remarks, 'jokes' and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Consensual and non-consensual sharing of 'nudes' and 'semi-nudes' images and or videos (also known as sexting or youth produced/involved sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission
- Initiation/hazing type violence and rituals (this includes abusive or humiliating activities as a way of initiating a person into a group and may also include an online element).

5.3   Bullying is a specific form of child-on-child abuse. There is no legal definition of bullying. However, it's usually defined as behaviour that is:

- intended to hurt someone either physically or emotionally
- repeated and/or with a power imbalance
- often aimed at certain groups, for example because of race, religion, gender or sexual orientation

5.4   The Trust and its academies recognise that even isolated incidents can be serious and require prompt intervention. Bullying is not always characterised by repeated actions; it may involve discrimination, exploitation of a power imbalance, or other harmful behaviours. We acknowledge that all negative behaviour among children, whether intentional or not, can cause harm. Therefore, all instances of unkind behaviour will be taken seriously and addressed appropriately, to uphold psychological safety and maintain our high expectations for respectful and supportive relationships.

5.5   The Trust and its academies recognise that some children may be more likely to experience COCA than others due to certain characteristics such as sexual orientation, ethnicity, race, or religious beliefs and will ensure that prejudice related incidents are dealt with in line with this policy.

6 | Harmful Sexual Behaviour

6.1   Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour displayed by children and young people which is harmful or abusive. HSB can include, but is not limited to;

- Using inappropriate language.
- Undertaking mutual sexual activity they are not ready for with peers.
- Sending and receiving illegal images.
- Sexual image sharing.
- Sexual interactions where there are significant power differences, lack of consent, or through force or threats.
- Sexual name-calling.
- Sexual harassment.
- Online sexual bullying.
- Sexual assault.

6.2   Sexual harassment is defined as any unwanted behaviour of a sexual nature. Sexual violence and sexual harassment are never acceptable and will not be tolerated. The Trust will act swiftly in response to instances of alleged child-on-child abuse and will follow its safeguarding policy, Keeping Children Safe statutory guidance and the DfE guidance on sexual violence and harassment between children.

6.3   The Trust and its academies will consider HSB through a safeguarding lens, using a traffic light approach to assessing behaviour as represented through 'Hackett's Continuum'. All forms of sexual behaviour including those that are 'green' will require a response which balances education, safeguarding and consequences. The Trust will also support its academies in the use of the Brook Traffic Light Tool to refine assessment.
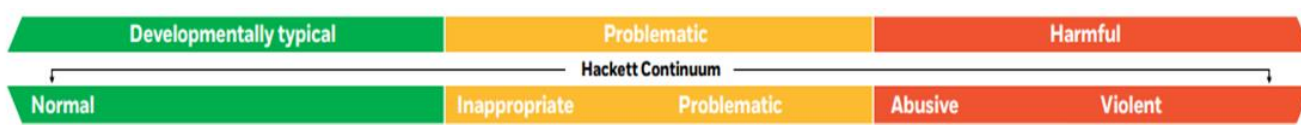
7 | Children with SEND

7.1   This Anti-Bullying & Anti-COCA Policy applies to all members of the Trust and Academy community, including students, staff, parents, and visitors. The word 'child' in this context is used to refer to anyone under the age of 18. The Trust and its academies are committed to tracking, monitoring, and addressing incidents of bullying and child-on-child abuse through its safeguarding and behaviour management systems. The Trust and its academies recognise that children with Special Educational Needs and/or Disabilities (SEND) are more likely to experience COCA than their peers without SEND and additional barriers exist when recognising this. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration.
- The potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs.
- The potential for children with SEND to have difficulties with social skills that may be mis-interpreted and/or may cause harm to others.

- Communication barriers and difficulties overcoming these barriers.

7.2   In implementing this policy, The Trust and its academies will implement appropriate adjustments and adaptive practice to meet the needs of students with SEND including;

- Staff training
- Adaptive practice in RSE lessons and targeted support where needed
- Adaptive practice to support social skills development
- Tailored support in relation to individual needs
- Collaboration with specialists to support understanding and intervention where required.

8 | Disadvantaged Students

8.1   We recognise that some students, including those eligible for pupil premium, may face socio-economic challenges that can impact behaviour. These challenges may stem from factors such as unmet needs, external stressors, or barriers to engagement. As a trust, we are committed to supporting our academies in monitoring these factors and intervening early to promote inclusion and avoid exclusions.

9 | Prevention

9.1   This policy adopts a contextual safeguarding approach, which includes:

- Understanding the impact of wider social contexts outside the home and academy on students and their interactions.
- Identifying where early Intervention can prevent issues from escalating and engaging external agencies including Local Authority Early Help where appropriate.
- Identifying any risky areas in the academy and community where COCA may occur and considering these in our assessment of risk.
- Being alert to and monitoring changes in students' behaviour and/or attendance that may be indicators of COCA.

9.2   **Preventative COCA Risk Assessment**
The academy conducts an annual preventative risk assessment to identify risks and plan mitigating actions linked to COCA. Risks will be assessed linked to the academies specific environmental or contextual factors. The Preventative Risk Assessment Includes;

- What training staff will need to recognise and prevent COCA
- What education students will need on appropriate behaviours, respectful relationships, and digital safety to keep themselves safe and how/when this will be included in the PHSE/Safeguarding curriculum.
- How student voice will be used to identify COCA risks
- What routes to self-referral mechanisms are required for students to remove barriers to disclosure
- How children who are more vulnerable to experiencing COCA will be identified and supported

- How safety mapping will be used to identify academy COCA 'hot spots' and enhance supervision
- How data will be used to review incidents and reduce risks
- How information sharing at transition points will be used to prevent COCA
- What systems need to be in place to prevent COCA happening via academy technology and online platforms.

10 | Recording and Internal Reporting

10.1   Any concerns must be reported to the DSL via accurate recording on CPOMS as soon as they come to light. If CPOMS is not available a paper recording form should be used. Where there are concerns that a child is at imminent risk of harm, they should be reported in person to the DSL to ensure an immediate response. Concerns may include but are not limited to;

- Observations made of unkind behaviour, bullying or COCA
- Incidents of prejudice related/discriminatory language and behaviour
- Disclosures from students about unkind behaviour, bullying or COCA
- Reports from parents or carers about unkind behaviour, bullying or COCA
- Concerns about a child's presentation that could be indicators of COCA eg pastoral concerns such as wellbeing concerns or poor attendance

10.2   When recording a disclosure, staff will take the child's concerns seriously, listen non-judgmentally and capture specific details accurately including any specific examples of abuse given by the child.

10.3   Students will regularly be made aware of the academy's routes for self-referral. This includes who the Safeguarding Team are and how to use the academy's non-verbal referral routes.

11 | Response to Incidents

11.1   All concerns and allegations of child-on-child abuse, including bullying, are handled sensitively, appropriately, proportionately, and promptly using professional judgement and listening to the wishes of the students involved and their parents. A one-page visual flow chart summarises the response in appendix 1.

11.2   Concerns and allegations of COCA will be responded to in the following ways:

11.3   **Immediate Response**
All concerns will be addressed in the following ways:

- Taken seriously
- Investigated as quickly as possible to establish the facts
- The incident will be reported to the DSL on CPOMS; depending on how serious the case is, it may be reported to the Principal

- A case log will be opened on the child's safeguarding file which will clearly indicate the type of COCA and the rationale for identifying COCA as opposed to a pastoral concern. The case log will include the child/children who have been harmed and the child/children who have caused harm
- Support and reassurance will be provided to the victim
- The victim will be consulted regarding their wishes and feelings about the next steps. Decisions will be made in their best interests
- Parents or carers of the victim and any children alleged to have caused harm will be notified of any incident on the same day it is reported. This may initially be a 'holding call' to ensure parents know that the academy is aware of an issue where a full investigation is yet to take place. If immediate communication is not feasible, they will be informed early the following day. Communication will occur either in person or via telephone. A detailed explanation of the subsequent steps will be provided, including the timeline for investigation, when they will next be contacted and support for their child
- All home communication will be recorded on CPOMS
- Details of any investigations including student interviews and/or statements will be logged on CPOMS
- It will be made clear to the child that has engaged in COCA/bullying behaviour that this behaviour will not be tolerated. If there is a group of people involved, they will be spoken to individually and as a whole group. It is important that children who have harmed another, either physically or emotionally, redress their actions, and staff will make sure that they understand what they have done and the impact of their actions
- The matter will be discussed with both parties, bringing them together where appropriate and educating the child who has caused harm on seeing the other person's point of view
- The focus will be on preventing further incidents. Sometimes the no blame approach will be used, sometimes negotiation and sometimes consequences.
- Any consequences will be proportionate to the seriousness of the incident and the child that has caused harm will be told why it is being used
- Suspension, off site direction or exclusion may be considered dependent on the circumstances
- Disciplinary actions align with the academy's behaviour policy, with measures including mediation, education, and restorative practices where appropriate
- Referral to appropriate agencies will be made dependent on the circumstances. This includes referrals to the police and children's social care where the academy has a statutory responsibility to do so
- Where harmful images of a child have been shared online staff may support children and families to access the NSPCC 'Report/Remove' tool to have this taken down
- Staff must never look at or try to assess nude or semi-nude images of children themselves but can use their powers of reasonable force to secure a child's device so that it can be handed to the police for investigation
- If a child is at immediate risk, the police and children's social care will be contacted.
- Staff will follow statutory guidance for handling reports of sexual violence and harassment, ensuring victims feel supported
- Reports of sexual offences must be escalated to the police and social care services

11.4   Balance of Safeguarding and Disciplinary Measures

Academies will implement a balance of safeguarding and disciplinary measures for children involved in COCA cases to ensure the following;

- Support is provided to both the alleged victim and the alleged perpetrator.
- Behaviour of a child who has caused harm is explored through the lens of what their behaviour might be communicating.
- Multi-agency engagement (social services, police, specialist counsellors) where required.
- Information sharing with families maintains appropriate levels of confidentiality.
- Where appropriate, risk assessments will be conducted to safeguard all students involved. This includes where there is a statutory requirement for a risks and needs assessment following an allegation of sexual violence.

Proactive Follow Up

11.5   Following the initial response, cases will continue to be monitored closely for a minimum period of 4 weeks and kept open for a further minimum period of 6 weeks. All actions will be recorded in the COCA/Bullying case log. COCA cases will only be closed when all children involved, and their families have confirmed that there have been no further incidents.

11.6   During the initial 4 week period a named appropriate staff member will be allocated to have oversight of the case. The child should be made aware of who to report any further incidents to, but this should never be relied on or used instead of proactive checks by staff. The child's wishes and feelings should be considered when planning the best way to undertake these checks as should the risk of exposing them in front of their peers. Where a holiday occurs during the 4 week period a check in should conducted on the last day of term

11.7   Parents or carers will be updated at weekly intervals during the 4 week period. The most appropriate method of communication will be agreed between the parent/carer and the staff member managing the case.

11.8   The victim will be consulted regarding their wishes and feelings about the next steps at key decision points. Decisions will be made in their best interests.

11.9   Further proactive follow up may include but is not limited to;

- Direct child's voice work for either/both victims and perpetrators to understand their lived experience and shape interventions
- Safety planning where appropriate
- Ongoing communication with parents/carers about concerns, interventions, and their child's well-being
- Where appropriate, referrals for counselling or specialist support (e.g., NSPCC, CAMHS)
- Post-incident reviews to ensure lessons are learned and preventative measures strengthened to minimise future risks

12 | Confidentiality and Information Sharing

12.1   The Trust and its academies are committed to handling all concerns related to COCA, including bullying, with sensitivity and in accordance with legal and statutory requirements.

Confidentiality

12.2   Staff will handle all reports of child-on-child abuse and bullying sensitively, ensuring that information is shared on a need-to-know basis only.

12.3   While every effort will be made to respect the privacy of students involved, confidentiality cannot be guaranteed where there is a safeguarding concern. In such cases, information will be shared with relevant agencies in line with statutory guidance and safeguarding procedures.

12.4   Students will be informed when disclosures cannot be kept confidential, and staff will explain how and why the information will be shared.

12.5   The academy understands that parents and carers may wish to know how incidents of child-on-child abuse or bullying have been addressed, particularly if their child has been affected. However, in line with UK GDPR (General Data Protection Regulation) and the Data Protection Act 2018, the academy cannot share information about another child, including any disciplinary actions taken against them.

Information Sharing

12.6   The academy follows the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, ensuring that personal data is processed lawfully, fairly, and transparently.

12.7   Information will only be shared where it is necessary to protect a child from harm, prevent crime, or support a safeguarding investigation.

12.8   Decisions to share information will be based on the principles of information sharing outlined in Working Together to Safeguard Children.

12.9   The academy will not require parental consent to share information with safeguarding partners if doing so could put a child at risk of harm.

13 | Complaints

13.1   If parents have any concerns or complaints over the application or implementation of this policy, they should raise their concerns with a staff member or the Principal in accordance with the Trust's Complaints Policy.

13.2   If the concern or complaint relates to a suspension or permanent exclusion, the procedure set out in the *DFE Guidance on Suspensions and Permanent Exclusions* should be followed.

Appendix 1 Procedural Flow Chart

COCA/Bullying Response Flow Chart

At all times victims should be listened to and taken seriously. They should not be made to feel that they are wasting people's time.

Incident reported on CPOMs
→

Immediate response

Start investigation

Separate students if necessary (pending investigation outcome)

Inform parents/carers (holding call if necessary)

Consider case history (read CPOMS)

Discuss with a colleague if necessary (supervision)

→

Decision making by trained staff

Pastoral Concern

Bullying

COCA – other including assault

HSB

DSL/DDSL assigns Incident on CPOMs

DSL/DDSL updates categories on CPOMs with rationale

DSL/DDSL adds PRI category if appropriate

→

Disciplinary response (consequence)
- Detention
- Internal Suspension

Safeguarding response (intervention)
- Proactive check ins
- Supportive interventions

→

Incident is closed only when there is evidence from proactive check ins that there has been no re-occurrence.

Disciplinary response (consequence)
- Detention
- Internal Suspension
- Suspension
- Managed Move
- Alternative Provision
- Exclusion
- Referral to police if aggravating factors

Safeguarding response (intervention)
- Risk Assessment
- Proactive check ins
- Follow COCA policy timelines
- Supportive interventions
- External referrals

→

Incident is closed when COCA policy timelines have completed and then only when there is evidence from proactive check ins that there has been no re-occurrence.

DSL agrees any closure.

COCA/Anti Bullying Policy Proactive Check In Timelines
- <u>At least</u> 4 weeks initially
- Proactive check in by named staff member every week
- Always check in when breaking up for a holiday during the period
- After minimum of 4 weeks and when all agreed it has stopped check ins can end but DO NOT CLOSE; leave open for a further 6 weeks with named staff member monitoring
- Review with DSL before closing with an agreed reason (decision rationale)