



Pewsey Vale School Harmful Sexual Behaviour Policy

Person Responsible	Jo Ronxin
Approved by Directors	
First Written	March 2025

For Review	Reviewed	Signature
March 2025		
July 2026		
July 2027		
July 2028		

*All policies are renewed annually. If no change then just signed.
If an amendment or full change is required, this is recorded.*

Legislative Background and Context

In the Sexual Offences Act 2003, the term Harmful Sexual Behaviour (HSB) covers a wide range of behaviours. HSB can occur online, offline or in a blend of both environments. The term HSB is widely acknowledged in child protection and should be treated in this context.

“Child-on-child” has evolved from the term “peer-on-peer” in recognition that age and development is a factor in making decisions about behaviour. A significant age difference between the children involved in an incident may lead to a decision about the behaviour being harmful or not. For example, this could be an older child’s behaviour towards a pre-pubescent child, or a younger child’s behaviour towards an older child with learning difficulties. It is important that designated safeguarding leads (DSLs) know what is and is not HSB.

Harmful sexual behaviours can be self-directed, for example, using highly sexualised language, persistent private and or public masturbation, prolifically watching or searching for pornographic content/ age-inappropriate materials. To understand more about the range of behaviours that should be recognised as harmful, please refer to the [NSPCC Harmful sexual behaviour framework](#).

Statement of Intent

Our school has a zero-tolerance approach to any harmful sexual behaviour involving children and acknowledges that it could be occurring at Pewsey Vale school and in our school community. The school is proactive in its approach to assessing prevalence, responding to incidents and challenging and changing behaviour. This policy applies to all trustees, academy councillors, staff and learners.

Schools have a statutory duty to safeguard the children in their setting. We work together to foster an environment that creates healthy relationships for children and young people.

Our whole-school approach encourages healthy relationships and works to prevent harmful sexual behaviour. We provide high quality education within the curriculum to reduce the likelihood of the situations occurring.

We recognise that harmful sexual behaviour is harmful to both the child/children affected by the behaviours and the child/children who displayed the behaviour, and provide ongoing support for all involved.

Our approach is to treat everything as a safeguarding incident in the first instance – we distinguish between behaviours that are exploratory and part of healthy age and ability appropriate development, and those that may be harmful.

As a school we provide regular opportunities for school staff to understand what harmful sexual behaviours might look like and what they should do in the event of a report. We do this by providing training and regular updates where possible.

We also use the RSHE curriculum to help educate students about these issues as well as regularly remind and promote reporting routes within school to ensure they know what to do should an incident occur.

Related Policies

School policies that should be read in conjunction with the HSB policy:

- Child protection and safeguarding policy
- Whistleblowing
- Behaviour policy
- Anti-bullying policy

- Online safety
- PHSE Policy
- Acceptable Use Agreements

Leaders and Designated Safeguarding Leads (DSLs)

Our leaders and DSLs have ultimate responsibility in dealing with all incidents of harmful sexual behaviour, including online. It is the expectation that all incidents of harmful sexual behaviour/sexual violence and harassment are reported to the school in line with school safeguarding and child protection procedures. We ensure that our DSLs and their deputies receive appropriate training so that they are confident in school safeguarding processes. They know when it is necessary to escalate and have information on what national specialist support is available to support all children involved in harmful sexual behaviour, and are confident as to how to access this support when required.

Our DSLs and their deputies have an in-depth working knowledge of key documentation, particularly KCSIE 2024. We ensure that they receive appropriate specialist training, commensurate with their role, and provide ongoing training for all school staff.

It is the role of school leaders and DSLs to ensure that all staff receive training specific to harmful sexual behaviour and that it is included as part of induction.

Staff

It is the responsibility of all staff to have read and understood this policy and associated policies. All staff must report any incidents or suspected incidents of harmful sexual behaviour in line with school policy and ensure they are informed of the outcome. It is expected that all staff will challenge any harmful sexual language or inappropriate behaviour. Staff have a duty to ensure that the school environment is one which is safe, and which supports learners to understand safe and healthy relationships and appropriate behaviour through delivery of our curriculum.

Trustees/Academy Council

We ensure our trustees and academy councils receive appropriate training about what harmful sexual behaviour is, when it can pose a risk to children and how to keep children safe. Our trustees/academy councillors receive regular training and updates, both in terms of what sexualised behaviour is, but also how to effectively support establishments and their stakeholders while holding provision to account.

As part of the Head of Safeguarding's termly reports and annual review, our Trust board (via Safeguarding, Standards and Improvement Committee) has the opportunity to monitor and evaluate the approach to harmful sexual behaviour to ensure it is adequate and effective. This includes evaluation of the curriculum, pupil voice activity and evaluation of parent/carers engagement. It is the responsibility of the trustees to ensure that risks relating to these issues are identified, that a number of reporting routes are available and that risks are effectively mitigated.

Learners

All learners have the right to learn in a safe, healthy and respectful school environment. Our learners benefit from a broad and balanced curriculum. They are taught about healthy relationships, how and when to report and that a range of different reporting routes are available to them. Our learners are encouraged to report any harmful sexual behaviour, even if they are not directly involved. All learners will be listened to if they make a disclosure and will be treated sensitively – while we cannot guarantee confidentiality, their requests will be considered when supporting them.

Parents/Carers

We work hard to engage parents and carers by:

- Running regular in-school sessions
- Sharing weekly newsletters and a monthly bulletin
- Sharing information online e.g. website, social media
- Providing curriculum

Our parents and carers are made aware of how and when to report any concerns to the school, that all incidents will be handled with care and sensitivity, and that it may sometimes be necessary to involve other agencies.

Vulnerable Groups

We recognise that, nationally, vulnerable learners may be more likely to be at risk of experiencing HSB. These include:

- A child with additional needs and disabilities
- A child living with domestic abuse
- A child who is at risk of/suffering significant harm
- A child who is at risk of/or has been exploited or at risk of exploited (CRE, CSE)
- A care experienced child
- A child who goes missing or is missing education
- Children who identify as, or are perceived as, LGBTQI+ and/or any of the other protected characteristics
- Children displaying HSB have often experienced their own abuse and trauma. We work to ensure that any vulnerable learner is offered appropriate support, both within and outside school, sometimes via specialist agencies

Training

Through the provision of good quality training and support, we strive to foster in our DSLs, and their deputies, a good understanding of HSB. This will form part of their safeguarding training. Supporting them in planning preventative education and measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding. The training includes:

- [Brook traffic light tool](#)
- National College Training
- Whole staff training
- Training and sharing of good practice within Acorn DSL network meetings

Our training strategy supports staff to respond effectively to different types of harassment and sexual misconduct incidents. An assessment of the training needs of all staff will be undertaken regularly and will form the basis of our training strategy.

Training will be made available on an ongoing basis for all staff and students to raise awareness of harassment and sexual misconduct with the purpose of preventing incidents and encouraging reporting where they do occur.

Education

Our school's educational approach seeks to develop knowledge and understanding of healthy, problematic or sexually harmful behaviours, and empowers young people to make healthy, informed decisions. Our school's approach is delivered predominantly through PSHE and RSE with additional opportunities provided through:

Cross curricular programmes e.g. Spark programme, Dragon's Den, Healthy Relationships Podcast, Blunt Truth

Computing

School Nurse to deliver sexual health programme for Y11.

Local community outreach team from the Police Force.

Our approach is given the time it deserves and is authentic i.e. based on current issues nationally, locally and within our setting. It is shaped and evaluated by learners and other members of the school community to ensure that it is dynamic, evolving and based on need. We do this through:

- Surveys
- Focus groups
- Parental engagement
- Staff consultation
- Staff training

Reporting

Our systems are well promoted in order to be easily understood and easily accessible for children and young people to confidently report abuse, knowing their concerns will be treated seriously. All reports will be dealt with swiftly and sensitively, and outcomes shared where appropriate. We also respond to anonymous reports, or reports made by third parties. This can be done via email to the Safeguarding Team.

We also recognise that incidents will not always be reported directly to us, therefore we also train staff to recognise and spot signs of harmful sexual behaviour.

Responding to an Incident or Disclosure

We recognise the importance of distinguishing between healthy, problematic and harmful sexual behaviour.

Our response is always based on sound safeguarding principles and follows school safeguarding processes. It is considered appropriate and puts the learner at the centre of all decisions made.

The school will always adopt a multi-agency approach and seek external support and guidance, in line with school policy, if deemed necessary. This may include:

Relevant agencies e.g., MASH, Early Help, CAMHS, Police, MHST, EWS.

Risk Assessment

The school may deem it necessary to complete a harmful sexual behaviour risk assessment as part of the response to any reported incidents. The purpose of the risk assessment is to protect and support **all those involved** by identifying potential risk, both in and out of school (e.g. public transport, after school clubs etc) and by clearly describing the strategies put in place to mitigate such risk.

The risk assessment will be completed following a meeting with all professionals working with the learner, as well as parents or carers. Where appropriate, the learners involved will also be asked to contribute.

The risk assessment will be shared with all staff who work with the learner, as well as parents and carers. It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.

Helpful links

[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 made 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).

Specialist Sexual Violence Sector Organisations

You can access 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 381 4772 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for school and college staff regarding online safety issues.

[Internet Watch Foundation](#)

If the incident/report you are dealing with involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF).

[Childline/IWF Report Remove](#)

Is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online.

[UKCIS Sharing Nudes and Semi-nudes Advice](#)

Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also 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.

[Lucy Faithfull Foundation](#)

Is a UK-wide charity dedicated solely to preventing child sexual abuse. They work to prevent abuse from happening in the first place by working with all those affected including adult male and female abusers.

[Marie Collins Foundation](#)

Support people to recover from technology assisted sexual abuse in childhood. We do this directly by supporting individuals and their families, and indirectly through advocacy and education.

[NSPCC National Clinical and Assessment Service](#)

(NCATS) a national service that offers assessment, treatment, consultation and training for and about children and young people where there are concerns about harmful sexual behaviour.

[Project deSHAME from Childnet](#)

Provides useful research, advice and resources regarding online sexual harassment.

Appendix 1 - What is Sexual Violence?

The following are sexual offences under the [Sexual Offences Act 2003](#):

Rape

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

Assault by Penetration

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

Sexual Assault

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

Causing someone to engage in sexual activity without consent

A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engage in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Appendix 2 - What is Sexual Harassment?

Part 5 in the Keeping children safe in education statutory guidance (2024) states:

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so 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.

While not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual "jokes" or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should make clear that when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.

- Sharing of unwanted explicit content
- Upskirting (this is a criminal offence)
- Sexualised online bullying
- Unwanted sexual comments and messages, including, on social media
- Sexual exploitation; coercion and threats

It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Appendix 3 - Online

Online content and contact can be an element of, or impact on, the harmful sexual behaviour being displayed. It is important to understand every aspect of the child's life to ensure a rounded response and this will include their online life. The behaviour may also be facilitated by online technologies.

Our schools recognises that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across social media platforms that leads to repeat victimisation. Online concerns can be especially complicated, and support is available from a range of organisations – see the **Helpful Links** section (pages 6-7).

In the context of harmful sexual behaviour, children and young people may experience inappropriate contact online and threats. Inappropriate contact could include sexualised communications from peers, adults, or unknown people and or grooming. Online threats can include threats to share nude images or expose personal information.