Sexual Violence and Sexual Harassment Policy

2025-2026

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MORE HOUSE SCHOOL
KNIGHTSBRIDGE

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1. Policy Statement

This policy outlines More House School's (the School's) response to dealing with child on child sexual violence and sexual harassment in or out of School and is for pupils, parents/carers, staff and governing bodies. This policy is written in accordance with the Department for Education guidance 'Keeping Children Safe in Education 2025'.

2. Introduction

2.1 Key Personnel

Role/Organisation	Name	Contact details
Designated safeguarding lead (DSL)	Miss Della-Porta (Director of Pastoral Care)	Tel : 020 7235 2855 sdella-porta@morehousemail.org.uk
Deputy DSLs	Ms Claire Phelps (Head) Mr Michael Keeley (Head of Operations)	Tel : 020 7235 2855 cphelps@morehousemail.org.uk mkeeley@morehousemail.org.uk
Head	Ms Claire Phelps (Head)	Tel : 020 7235 2855, office@morehousemail.org.uk
Heads PSHE and RSE	Miss Tia Williams	twilliams@morehousemail.org.uk
Governor with oversight of Safeguarding	Ms Sue Shale	office@morehousemail.org.uk
Chair of Governors	Mr Ian Bogle	office@morehousemail.org.uk

2.2 Context

More House School, as an all girls' school, operates under the assumption that '*it happens here, even when there are no specific reports as it may be the case that it is just not being reported,*' and thus we put in place a whole-School approach to treat any issues, concerns, allegations and reports very seriously and in line with the procedures set out below. Our approach is underpinned by the principle that there is a **zero-tolerance** approach to Sexual Violence and Sexual Harassment, that it is never acceptable and will not be tolerated. The School recognises that girls are more likely to be the victim of sexual violence and sexual harassment, and that boys are more likely to be perpetrators. However, in educating students about sexual violence and sexual harassment, care is taken not to demonise any individuals based on their gender.

2.3 Legal responsibilities

We have due regard to our statutory duty to safeguard and promote the welfare of the children at their school. As part of this duty, More House School is required to have regard to guidance issued by the Secretary of State including Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023). Furthermore, we have a statutory duty to co-operate with our local safeguarding partners. Equally, safeguarding partners are expected to collaborate with us in a meaningful way.

Our responsibilities are reflected in this and associated policies, including our Behaviour and Discipline Policy, Anti-Bullying Strategy and RSE and PSHE policy and programme.

Furthermore we are aware of our obligations under the Human Rights Act 1998 (HRA). We are also to comply with relevant requirements as set out in the Equality Act 2010 (the Equality Act).

3. Definitions

3.1 Victims and Alleged Perpetrators

There are many different ways to describe students who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have carried out any form of abuse. For the purposes of this policy, the term 'victim' will be used. We also acknowledge, as a School, that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a victim or would want to be described in this way. As a School we will be conscious of this whilst managing any incident and be prepared to use any term with which the individual pupil is most comfortable.

For the purpose of this policy, we use the term 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)'. The use of this terminology will be determined, as appropriate, on a case-by-case basis. The School will take care to not demonise any student.

3.2 Sexual Violence and Sexual Harassment

- **Sexual violence** means rape, assault by penetration, or sexual assault (intentional sexual touching). This may include an online element which facilitates, threatens and/or encourages sexual violence.
- **Sexual harassment** means unwanted conduct of a sexual nature – such as sexual comments, sexual jokes or taunting, physical behaviour like interfering with clothes, or online harassment such as sexting.

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and into college. It can occur through a group of

children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

Children who are victims of sexual violence and sexual harassment, wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. As set out in Part one of KCSIE (2025), we are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school, including intimate personal relationships (also known as 'teenage relationship abuse'.

4. Key considerations

Sexual Violence and Sexual Abuse can happen anywhere, and all More House Staff working with children are advised to assume that ***'it happens here'***. We will respond appropriately to all reports and concerns, including those outside the School and/or online. We acknowledge through the 'Everyones Invited' website and Ofsted's report that Sexual Violence and Sexual Harassment is prevalent in Schools and we take an active approach to develop a culture where such behaviours are not accepted. Victims should be reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

More House School wishes to reiterate and make clear that there is a **zero-tolerance** approach to Sexual Violence and Sexual Harassment and it is never acceptable, and it will not be tolerated and it should never be passed off as "banter", "just having a laugh", "part of growing up" or "girls/boys being girls/boys". We acknowledge that challenging physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts must be addressed. Dismissing or tolerating such behaviours risks normalising them. Not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour and an unsafe environment. In worst case scenarios they can lead to a culture that normalises abuse such that children accept it as normal and don't come forward to report it.

We also understand that all of the above can be driven by wider societal factors beyond the School, such as everyday sexist stereotypes and everyday sexist language. This is why a whole School approach (especially preventative education) as described below is important.

4.1 Vulnerable Students

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. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- The potential for pupils with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs, and/or
- Communication barriers and difficulties overcoming these barriers.

Any reports of abuse involving pupils with SEND will therefore require close liaison with the DSL and Deputy DSL and the special educational needs co-ordinator (SENCO).

In addition, pupils who are lesbian, gay, bi, trans or questioning their sexuality (LGBTQ) can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBTQ (whether they are or not) can be just as vulnerable as a pupil who identifies as LGBTQ.

As well as providing support to pupils who are victims of Sexual Violence or Sexual Harassment, the School will continue to provide the alleged perpetrator(s) with an education and safeguarding support, as appropriate and implement any disciplinary sanctions.

We also acknowledge that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

4.2 Sexual Violence

More House School demonstrates an awareness of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school. When referring to sexual violence in this policy, we do so in the context of child on child sexual violence.

For the purpose of this policy, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: 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. (As a School we are aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

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

4.3 Definition of 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, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual consent:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16; and
- sexual intercourse without consent is rape.

4.4 Sexual Harassment

For the purpose of this policy, 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. 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.

Whilst 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 (the School will consider when any of this crosses a line into sexual violence noting that it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- Upskirting (a criminal offence),and
- Online Sexual Harassment which could be stand alone, or part of a wider pattern of sexual harassment and/or Sexual Violence. This may include:

- Consensual and non-consensual sharing of nude and semi-nude images and videos;
- Sharing of unwanted explicit content;
- Sexualised online bullying or unwanted sexual comments and messages, including on social media;
- Sexual exploitation; coercion and threats, and
- Coercing others into sharing images of themselves or performing acts they're not comfortable with online.

More House School considers 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.

4.5 Harmful Sexual Behaviour

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 inappropriate and may cause developmental damage. A useful umbrella term is "Harmful Sexual Behaviour" (**HSB**). The term has been widely adopted in child protection and is used in this policy. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

When considering HSB, ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is a difference of more than two years or if one of the children is pre-pubescent and the other is not. 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. Confidential, specialist support and advice on HSB is available from the specialist sexual violence sector:

- Rape Crisis (England & Wales) or The Survivors Trust for information, advice, and details of local specialist sexual violence organisations;
- NICE guidance contains information on, amongst other things: developing interventions; working with families and carers; and multi-agency working;
- The Lucy Faithfull Foundation has developed a HSB toolkit;
- The NSPCC provides free and independent advice about HSB.

Children displaying HSB have often experienced their own abuse and trauma. We acknowledge that it is important that they are offered appropriate support.

5. The whole school approach to preventing child on child Sexual Violence and Sexual Harassment

More House School is aware that the best responses to child Sexual Violence and Sexual Harassment are those which take a whole School approach to safeguarding and child protection. This means involving everyone in the School including the governing body, all the staff, children, adult students and parents and carers. Safeguarding and child protection is a recurrent theme running through policies and procedures.

More House School's approach to Sexual Violence and Sexual Harassment reflects and is part of the broader approach to safeguarding. Ultimately, all systems, processes and policies will operate with the best interests of the child at their heart.

The safeguarding procedures with regard to Sexual Violence and Sexual Harassment are transparent, clear and easy to understand for staff, pupils, parents and carers. Systems are in place for pupils to confidently report abuse, Sexual Violence and Sexual Harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback. These are set out in our Safeguarding and Child Protection Policy.

Due to a wider societal culture of victim blaming, some students may be afraid of how reporting incidents of abuse and harassment will reflect on them. Creating a culture and ethos of respect, tolerance, acceptance and diversity makes it easier for pupils to call out incidents and harder for anyone to get away with sexist or inappropriate sexual behaviour. The School aspires to create a culture of respect underpinned by our Behaviour and Discipline Policy.

5.1 Extra-familial harms

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online; this can take the form of abusive, harassing, and misogynistic/misandry messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the DSL or a Deputy DSL.

5.2 The Role of Education in Prevention

More House School plays an important role in preventative education. Keeping Children Safe in Education sets out that all Schools should ensure children are taught about

safeguarding, including how to stay safe online. More House School considers this as part of providing a broad and balanced curriculum. The most effective preventative education programme is through our whole School approach that prepares pupils for life in modern Britain. More House School has a clear set of values and standards, and these will be upheld and demonstrated throughout all aspects of School life. This will be underpinned by our behaviour policy and pastoral support system, and by a planned programme of content delivered through the whole curriculum. This will tackle issues such as:

- Healthy and respectful relationships;
- What respectful behaviour looks like;
- Consent;
- Stereotyping;
- Equality;
- Body confidence and self-esteem;
- Prejudiced behaviour;
- That Sexual Violence and Sexual Harassment is always wrong; and
- Addressing cultures of sexual harassment.

More House School delivers a rigorous and robust PSHE programme and the statutory RSE that covers all the relevant laws and issues. The topic of 'Being Safe' in RSE covers consent. Advice and lesson plans provided by the PSHE Association are used to teach consent at Key stages 3 and 4. The concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, forced marriage, rape, domestic abuse and FGM and how these can affect current and future relationships are also examined.

The focus on healthy relationships in More House School will help those pupils who are experiencing or witnessing unhealthy relationships know where to seek help and report abuse. Good practice allows pupils an open forum to talk things through.

6. More House School's response to reports of Sexual Violence or Sexual Harassment

6.1 Responding to reports

Reports of sexual violence or sexual harassment are often complex and require difficult professional decisions to be made, often quickly and under pressure. Any decisions are to be made on a case-by-case basis with the DSL or a Deputy DSL taking the lead role, using their professional judgement, and being supported by other agencies, such as children's social care and the police as required.

Some situations are statutorily clear:

- A child under the age of 13 can never consent to any sexual activity.

- The age of consent is 16.
- Sexual intercourse without consent is rape (as defined in law).
- Creating and sharing sexual photos and videos of under 18s is illegal (often referred to as sexting). This includes children making and sharing sexual images and videos of themselves.

At More House School we acknowledge that pupils may not find it easy to speak to staff about their abuse and may offer information on a piecemeal basis. Pupils may show signs or act in ways that they hope staff will notice and react to. In some cases, the victim may not make a direct report. We endeavour to ensure that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. As with all safeguarding concerns, staff will take appropriate action in accordance with the More House School Safeguarding and Child Protection policy. Staff will, if in doubt, speak to the DSL or Deputy DSLs.

The discussion will be handled sensitively and with the support of children's social care if required. We are aware that there may be reports where the alleged sexual violence or sexual harassment involves pupils from More House School but is alleged to have taken place away from the School premises, or online. The safeguarding principles, and the School's duties to safeguard and promote the welfare of their pupils and students, remain the same. In such circumstances, appropriate information sharing and effective multi-agency working will be important.

As per Part One of Keeping Children Safe in Education, if More House staff have any concerns about a pupil's welfare, they will endeavour to act on them immediately. As per Part One of Keeping Children Safe in Education, **all staff will be trained to manage a report.**

We acknowledge that effective safeguarding practice includes:

- If at all possible, managing reports with two members of staff present, (preferably one of them being the DSL or a Deputy DSL);
- Where the report includes an online element, being aware of searching, screening and confiscation advice including the UK Council for Internet Safety (UKCIS) Sharing nudes and semi nudes: advice for education settings working with children and young people. The key consideration is for More House staff not to view or forward illegal images of a child. *Note that there may be occasions where viewing an image is unavoidable. In such cases, it may be more appropriate to confiscate any devices to preserve evidence and hand them to the police for inspection*;
- Staff not promising confidentiality as it is very likely a concern will have to be shared (for example, with the DSL and/or children's social care). Staff should only share the report with those who need to know in order to progress it. It is important that the victim understands to whom the report will be passed and what the next steps will be;
- Recognising that a pupil is likely to disclose information to someone they trust: this could be anyone on the school staff. It is important that the staff member in whom

the pupil confides recognises that the pupil has placed them in a position of trust. They should be supportive and respectful of the pupil;

- Recognising that an initial disclosure to a trusted adult may not indicate a single incident, it could be that there is ongoing abuse and this is the first time that a pupil has felt able to report it; also being aware that trauma can impact memory, i.e pupils may not be able to recall all details or timeline of abuse;
- Keeping in mind that certain pupils may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation, and
- Listening carefully to the pupil, reflecting back, using the pupil's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc.

It is important to note that whilst leading questions should generally be avoided, staff can ask pupils if they have been harmed and ask what the nature of that harm was, ensuring that:

- A written record is made;
- Only the facts as the pupil presents them are recorded, and
- The DSL or a Deputy DSL is informed as soon as practically possible, if neither of them is involved in the initial report.

6.2 Considering confidentiality and anonymity

More House staff should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and to engage appropriate agencies. More House School will endeavour only to engage staff and agencies who are required to support the pupils involved and/or be involved in any investigation.

The victim may ask the School not to tell anyone about the Sexual Violence or Sexual Harassment. We acknowledge that there are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. On such occasions, the DSL and/or a Deputy DSL will consider the following:

- Parents or carers should normally be informed (unless this would put the victim at greater risk);
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care, and

- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the DSL or the Deputy DSLs will have to balance the victim's wishes against their duty to protect the victim and other pupils and to follow statutory guidance. If the DSL or a Deputy DSLs decide to go ahead and make a referral to children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

Anonymity

Where an allegation of Sexual Violence or Sexual Harassment is progressing through the criminal justice system, we will be aware of anonymity, witness support and the criminal process in general so they can offer support and act appropriately. Please note, it is not the role of More House School to provide legal advice or support to victims, alleged perpetrators or parents in respect of a criminal justice process.

As a matter of safeguarding practice, we will do all that we reasonably can to protect the anonymity of any pupils involved in any report of Sexual Violence or Sexual Harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the pupil(s) involved. We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

6.3 Risk Assessment

When there has been a report of sexual violence, the DSL or a Deputy DSL should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- The victim, especially their protection and support;
- Whether there may have been other victims;
- The alleged perpetrator(s);
- All the other pupils (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm,
- The time and location of the incident, and any action required to make the location safer, and
- In the case of an intra-familial harm, the School will also assess the needs of siblings.

Risk assessments will be recorded (written or electronic) and should be kept under review. More House School will actively be considering the risks posed to all pupils and endeavour to put adequate measures in place to protect them and keep them safe.

The DSL or a Deputy DSL will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above referenced school assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform More House School's approach to supporting and protecting their pupils and updating our own risk assessment.

6.4 Immediate action following a report of Sexual Violence and/or Sexual Harassment

What to consider

We will carefully consider any report of sexual violence and/or sexual harassment both online and offline, including those that have happened outside School. The DSL or a Deputy DSL will endeavour to consider:

- The ongoing wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with More House's duty and responsibilities to protect other pupils;
- The nature of the alleged incident(s), including: whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed;
- The ages of the pupils involved;
- The developmental stages of the pupils involved;
- Any power imbalance between the pupils. For example, is an alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- Are there ongoing risks to the victim, other pupils, adult students or school staff; and
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation or if the case is intrafamilial and there are siblings that require additional support.

As always, when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, More House will follow general safeguarding principles as per Keeping Children Safe in Education. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

The school's response will be:

- Proportionate
- Considered
- Supportive
- Decided on a case-by-case basis

Whilst the school will make it clear that Sexual Violence and Sexual Harassment will not be tolerated, no student will feel demonised.

The alleged perpetrator(s) will be offered support so that they can change their behaviour.

Where there is an online element to a report, More House follows effective safeguarding practice which includes being aware of Searching for screening and confiscation advice and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Sanctions considered may include:

- A verbal warning;
- Keeping the pupil behind after class to apologise to their peer;
- A letter or phone call to parents;
- Detention;
- A period of internal exclusion (length dependent on incident), or
- Suspension (fixed-term exclusion) - length dependent on incident - or permanent exclusion.

After all incidents

- A record will be made on CPOMS, and
- Parents will be informed (All incidents of Sexual Violence and Sexual Harassment will involve parental contact unless it is deemed unsafe to do so).

After serious incidents

- The Local Authority will be informed for further guidance as necessary and/or
- The police will be contacted through the DSL.

6.5 Sexist comments in School

We want everyone to feel included, respected and safe in our School. We will not tolerate verbal abuse, which includes name-calling and sexist comments.

Sexist comments are those which discriminate based on sex, particularly against women.

Sexism also includes behaviour or attitudes that create stereotypes of social roles based on sex.

All staff and pupils are encouraged to call out and/or report this behaviour. If pupils make these comments, we will:

- Ask them to apologise to anyone the comment was directed at;
- Support and educate them to improve their behaviour;
- Monitor their behaviour for any recurrence, and
- Escalate the sanction to a phone call to parents if the pupil refuses to apologise in the first instance.

Our PSHE curriculum will cover what healthy and respectful behaviour towards one another looks like.

Why added: This demonstrates our zero-tolerance approach better by making the following things clearer:

- *What the unacceptable behaviour involves*
- *What we want the culture in our school to be*
- *How we will respond to this behaviour*
- *How we will support the victim(s) and alleged perpetrator(s)*

6.6 'Lower level' concerns

'Lower-level' incidents are far more frequent than severe incidents, and can underpin the problematic 'normalised' culture Ofsted refers to in its review (see Section 4).

Pupils will be encouraged to call out and report anything that makes them uncomfortable, no matter how 'small' they think it is.

Staff will let pupils know that the School will:

- Take their safety and wellbeing seriously;
- Listen to them;
- Act on their concerns, and
- Not tolerate or accept abuse

Staff will highlight the supportive and protective aspect of a 'zero-tolerance' approach. The School acknowledges that reporting incidents benefits everyone, including:

- The victim(s): by stopping the problem and getting the help and support they need;
- Other people: by preventing it happening to someone else, and

- The alleged perpetrator(s): catching problematic behaviour early can help them avoid criminal offences later in life.

6.7 Options to manage the report

As a School we will assess every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be a decision that will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, More House School will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, in accordance with general safeguarding principles, this does not and should not stop us taking immediate action to safeguard the pupils, where necessary.

There are four likely scenarios to consider when managing any reports of Sexual Violence and/or Sexual Harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is also important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the School will decide on a course of action.

The Head, DSL and the Deputy DSLs will determine the approach from the following four options:

1. Manage internally

- In some cases of Sexual Harassment, for example, one-off incidents, More House may take the view that the pupils concerned do not need Early Help or require referrals to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour and bullying policies and by providing pastoral support, and
- All concerns, discussions, decisions and reasons for decisions will be recorded (in hand written or electronic form and stored on CPOMS).
- Parents will be informed of what the child has said or done and the School will request support from home in condemning the behaviour.

2. Early Help

- More House School may decide that the pupils involved do not require referral to statutory services but may still benefit from Early Help. Early Help means providing support as soon as a problem emerges, at any point in a child's life. Providing Early Help is more effective in promoting the welfare of pupils than reacting later. Early Help can be particularly useful to address non violent HSB and may prevent escalation of sexual violence;
- Multi-agency Early Help will work best when placed alongside School policies, preventative education and engagement with parents and carers;

- Early Help and the option to manage a report internally do not need to be mutually exclusive: More House School could manage internally and seek Early Help for both the victim and perpetrator(s).
- Once again, all our approaches are underpinned by the principle that there is a zero-tolerance approach to Sexual Violence and Sexual Harassment and it is never acceptable and will not be tolerated, and
- All concerns, discussions, decisions and reasons for decisions will be recorded (in hand written or electronic form on CPOMS).

3. Referrals to Children's Social Care

- Where a pupil has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to local children's social care;
- At the point of referral to children's social care, we will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision will be made with the support of children's social care;
- If a referral is made, children's social care will then make enquiries to determine whether any of the pupils involved are in need of protection or other services;
- Where statutory assessments are appropriate, the DSL and a Deputy DSL will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support;
- The School recognises that the distress experienced by students who are victims will likely find the experience stressful and distressing, which is likely to adversely affect their educational attainment and will be exacerbated if the alleged perpetrator attends the same School;
- As a School we should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other pupils in the school. The DSL and a Deputy DSL will work closely with children's social care (and other agencies as required) to ensure any actions the School takes do not jeopardise a statutory investigation. The risk assessment will help inform any decision. Consideration of safeguarding the victim, the alleged perpetrator(s), any pupils directly involved in the reported incident and all children (and adult students) at the School will be immediate;
- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The School (the DSL and a Deputy DSL) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL and a Deputy DSL will consider other support mechanisms such as Early Help, specialist support and pastoral support;

- Once again, all More House School approaches are underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated, and
- All concerns, discussions, decisions and reasons for decisions will be recorded (in hand written or electronic form on CPOMS).

4. Reporting to the police

- Any report to the police will generally be in parallel with a referral to children's social care (as above);
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is to pass it on to the police, even if the alleged perpetrator is under ten, the age of criminal responsibility. The police will take a welfare, rather than a criminal justice, approach;
- At this stage, we will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the School supports the pupil in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies;
- When a report has been made to the police, More House will agree with them what information can be disclosed to staff and others and, in particular, to the alleged perpetrator(s) and their parents or carers. We will also discuss the best way to protect the victim and their anonymity;
- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces;
- In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that we continue to engage with specialist support for the victim and alleged perpetrator(s) as required;
- Once again, all our approaches are underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated,
- All concerns, discussions, decisions and reasons for decisions will be recorded (in hand written or electronic form).

Unsubstantiated, unfounded, false or malicious reports

In line with Part One of Keeping Children Safe in Education, all concerns, discussions, and decisions made, and the reasons for those decisions, will be recorded in writing. Records

will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL and Deputy DSLs, in conjunction with the Head, will consider whether the pupil who has made the allegation is in need of support or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, More House may need to consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's policy on Behaviour and Discipline.

6.8 Ongoing response: Safeguarding and supporting the victim

The following principles are based on safeguarding practice and should help shape any More House decisions regarding safeguarding and supporting the victim.

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim - if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the School is a safe space for them;
- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report, and
- Consider the proportionality of the response. Support should be tailored on a case by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape. Support can include:
    - Early Help and children social care support as set out in Part One of Keeping Children Safe in Education;
    - Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence;
    - Child and adolescent mental health services (CAMHS). CAMHS is used as a term for all services that work with children and young people who have difficulties with their emotional or behavioural wellbeing;
    - The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis

(England & Wales) or The Survivors Trust for details of local specialist organisations;

- NHS - Help after rape and sexual assault - NHS (www.nhs.uk) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics;
- Rape and sexual assault referral centres services can be found at: **Rape and sexual assault referral centres**. Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111;
- Childline provides free and confidential advice for children and young people, and
- Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.

Victims may not disclose the whole situation immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the DSL and a Deputy DSL should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or the DSL) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). We will respect and support this choice.

A victim of Sexual Violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. Whilst we would avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, More House will provide a physical space for victims to withdraw.

It may be necessary for More House to maintain arrangements to protect and support the victim for a long time. We will be prepared for this and will work with children's social care and other agencies as required. More House School will do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

Whilst the pupil(s) should be given all the necessary support to remain in More House, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college should be considered to enable them to continue to receive a suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

If for any reason the victim does move to another educational institution, it is important that the new School or college is made aware of any ongoing support needs. The DSL will

take responsibility for ensuring this happens (and should discuss with the victim and, where appropriate, their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

6.9 Safeguarding and supporting the alleged perpetrator(s) and pupils who have displayed Harmful Sexual Behaviour

- It must be stated that this will be a difficult balancing act to consider. On the one hand More House School will need to safeguard the victim (and all other pupils, adult students and staff at the School) and on the other hand potentially provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- A child abusing another child may be a sign they have been abused themselves or be symptomatic of wider issues that require addressing within the School. More House will work with professionals as required to understand why a child may have abused a peer. It is important to remember that, as a child, any alleged perpetrator(s) is entitled to, deserving of, and should be provided with, a high level of support to help them understand and overcome the reasons for their behaviour and help protect other children by limiting the likelihood of them abusing again.
- Consider the age and the developmental stage of the alleged perpetrator(s) and nature and frequency of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. An alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often is) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police.
- It is important that the perpetrator(s) is also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

For further advice see the School's Policy on Behaviour and Discipline. If an exclusion is required, this will be a decision for the Head to make. We are aware that the School can be a significant protective factor for pupils who have displayed HSB, and continued access

to the School, with its comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. If for any reason the alleged perpetrator(s) does move to another educational institution, it is important that the new school or college is not only made aware of any ongoing support needs, but also - where appropriate - of potential risks to other children, adult students and staff. The DSL will take responsibility for ensuring this happens, as well as transferring the child protection file.

6.10 Discipline and the alleged perpetrator(s)

With regard to the alleged perpetrator(s), advice on behaviour and discipline, where conduct falls below the standard which could be reasonably expected of them can be seen in the Behaviour and Discipline Policy. Disciplinary action can be taken whilst other investigations by the police and/or children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent More House School from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a sanction accordingly. This is a matter for the School and will be carefully considered on a case-by-case basis. The DSL and a Deputy DSL, in conjunction with the Head, will lead on this. The School will consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or children's social care should help the school make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is considering the same facts.

Discipline and support

As previously stated, taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. On the one hand there is preventative or forward-looking action to safeguard the victim and/or the alleged perpetrator(s), especially where there are concerns that the alleged perpetrator themselves may have been a victim of abuse; and, on the other, there is disciplinary action to punish a perpetrator for their past conduct. Such action will be in accordance with the law.

7. Working with Parents and Carers

More House School will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence. The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. We will consider what information we provide to the respective parents or carers about the other child involved and when to do so. In some cases, children's social care and/or the police will have a very clear view and it will be important for the School to work with relevant agencies to ensure a consistent approach is taken to information sharing.

It is good practice to meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.

It is also good practice to meet with the alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions should be explained. Support for the alleged perpetrator should be discussed. The DSL and/or a Deputy DSL will lead such discussions. The need for other agencies to be present at these meetings should be considered on a case-by-case basis. Where appropriate, we will aim to:

- Get the parents on board in condemning the behaviour;
- Start an important conversation between the pupil and their parents about acceptable and unacceptable sexual behaviour, and
- Work towards a solution together.

Parents and carers may well struggle to cope with a report that their child has been the victim of an assault or is alleged to have assaulted another child. Details of organisations that support parents will be provided, as required, by More House School.

8. Safeguarding other children

Consideration will be given to supporting pupils (and adult students) who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required.

Following any report of Sexual Violence or Sexual Harassment, it is likely that some pupils will take "sides". The School will do all we can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed.

Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves.

School transport is a potentially vulnerable place for a victim or alleged perpetrator(s) following any incident or alleged incident. As part of our School risk assessment, we will consider any additional potential support needs to keep all of their children safe.

A whole school approach to safeguarding, a culture that makes clear that there is a zero-tolerance approach to Sexual Violence and Sexual Harassment and that it is never acceptable, and a strong preventative education programme will help create an environment in which all More House pupils are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.

We will keep our policies, processes, and curriculum under constant review to protect all pupils of More House School. Reports of sexual violence and/or harassment (especially where there is evidence of patterns of behaviour) may point to environmental and or

systemic problems that could and should be addressed by updating relevant policies, processes, or relevant parts of the curriculum.

9. Case review

Any sexual violence or sexual harassment incidents will be followed by a review to look for patterns of behaviour across the School and lessons learnt from the case handling. An audit of cases is complete on a termly basis with the DSL and Deputy DSL's, any trends will be looked for and future support will be implemented as necessary.

10. Associated Policies

- Keeping Children Safe in Education 2025
- RSE Policy
- Safeguarding and Child Protection Policy
- PSHE Policy
- Anti-Bullying Strategy
- Policy on Behaviour and Discipline

Appendix 1 - Child-on-child sexual abuse: Risks and needs assessment template

Area of Risk	Considerations	Child 'A'	Child 'B'	Notes	Actions (Immediate or Ongoing)
Details of the incident Record details of the incident from the point of view of both children	· How serious is the incident? Was it a crime? · Were there any other victims? [If yes, add extra columns for each other child] · Do we need to make arrangements to limit contact between the children involved, other than keeping them a reasonable distance apart on School premises including at before and after-school activities? (If the allegation relates to rape, assault by penetration, or sexual assault, the answer is automatically yes) · How did the School find out about it? Was it reported directly or by someone else with knowledge of the incident? · Did the incident take place within an intimate relationship between the children?(young people) · Are there any related issues, including links to child sexual			Use this column to record additional information that may be relevant For example, previous, unrelated behaviour incidents	

	exploitation and child criminal exploitation?				

Social risks	· Do the children (young people) share a peer group? Are people in their friend group likely to take sides? · Do they both attend More House School? · Do other people know about the incident? Do those people understand: o Who they can talk to if they have concerns about the people involved, or about their own safety and wellbeing o The importance of confidentiality o If, and how, they may need to be involved in any further investigations · Are they likely to be the subject of gossip, bullying or further harassment? · Have there been previous incidents of sexually inappropriate behaviour within their peer group(s)? · Do they risk being alienated from their friend group(s) as a result of this incident?				

Physical risks	· Do they feel, or continue to feel, physically threatened by the other child? · Do you have reason to believe there is a continued risk to the safety and wellbeing of the children involved, or other pupils and staff? · Is either party at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers) · Do they share classes/break times/etc.? · Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of school? How can such contact be limited? · Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) on school transport? How can we provide support here?				

Environmental risks	· Do they live in a home where violence or abuse has occurred? · Do they live in or near an area or location known to police to be high risk for sexual harassment or assault? · Are they active on social media? If so, how? Do they know how to protect themselves from online grooming? · What activities do they take part in outside of school? · Are parents clear about: o How the school (and partner agencies) are handling the incident? o Confidentiality? o The conduct expected of them while an investigation is ongoing?				

Date	Updates made	Reasons for updates	Updates made by
	E.g, “Updated lunchtime arrangements”	E.g, “Feedback from Child A”	