



# **Harmful Sexual Behaviour Policy**

## **Priestley Smith Specialist VI School**

**January 2024**

Policy review date: January 2026

Policy status: Statutory

Responsible member of SLT: Liz Clabon Deputy Headteacher

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## *Statement of Intent*

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Our school has a zero-tolerance approach to any harmful sexual behaviour involving children and acknowledges that it could be occurring at Priestley Smith School or otherwise in the lives of our children. The school is proactive in its approach to assessing prevalence, responding to incidents and challenging and changing behaviour. This policy applies to all governors, staff and pupils.

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 stage appropriate education within the curriculum to reduce the likelihood of the situations occurring. We adapt our support and teaching to the SEND present for our pupils. All have a vision impairment and thus will have gaps in their incidental and experiential learning that sighted children would have. Many of our pupils have cognition or sensory autistic linked needs that will require bespoke approaches of support including **the use of mobility aids and adapted technology**.

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 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 updates where possible. We also use the PSHE and 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.

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## *Related Policies*

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- Safeguarding policy
- Whistleblowing
- Behaviour policy
- Anti-bullying policy
- Online safety
- Acceptable Use Agreements

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## *Leaders and Designated Safeguarding Leads (DSLs)*

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Our 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 procedures. We ensure that our DSLs 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 have an in-depth working knowledge of key documentation, particularly the latest KCSIE. 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 DSLs to ensure that all staff and Governors receive training specific to harmful sexual behaviour and that it is included as part of induction.

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### *Staff*

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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 pupils to understand safe and healthy relationships and appropriate behaviour through delivery of our curriculum.

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### *Governors*

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

As part of the headteacher's report, our governing body 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/carer engagement. It is the responsibility of the trustees/governors to ensure that risks relating to these issues are identified, that a number of reporting routes are available, and that risks are effectively mitigated.

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### *Pupils*

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All pupils have the right to learn in a safe, healthy and respectful school environment **which recognises the person and set of circumstances behind the disability**. Our pupils benefit from a broad and balanced curriculum which is planned to support their stage of learning, their cognition and adapted to their VI needs. They are taught about healthy relationships and how and when to report and that a range of different reporting routes are available to them. Our pupils are encouraged to report any harmful sexual behaviour, even if they are not directly involved. All pupils will be listened to if they make a disclosure and will be treated sensitively - whilst we cannot guarantee confidentiality, their requests will be considered when supporting them.

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### *Parents/Carers*

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We work hard to engage parents and carers by:

- Sharing safeguarding issues in newsletters
- Sharing information **and student real life lived experiences**
- Providing curriculum information
- Close early help conversations between families and school learning mentors
- Ensuring they know we are working within the Operation encompass Framework

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.

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### *Vulnerable Groups*

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We recognise that our pupils who all have a vision impairment, **use mobility aids**, and many have cognition and sensory needs are vulnerable and may be more likely to be at risk of experiencing HSB.. Other vulnerabilities may include

- 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

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### *Training*

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Through the provision of good quality training and support, we strive to foster in our DSLs, 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 safeguarding policy and incorporating the approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding. The training includes:

- [Brook traffic light tool](#)
- Whole staff training
- Advice from the Birmingham SHTB
- **Collaboration with disability charities and community support groups**

Our training strategy supports staff to respond effectively to different types of harassment and sexual misconduct incidents.

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.

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### *Helpful links*

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#### **[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 Safeguarding Advisors.

#### **[The NSPCC](#)**

Provides a helpline for professionals at 0808 800 5000 and [help@nspcc.org.uk](mailto: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).

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### *Specialist Sexual Violence Sector Organisations*

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- **Local visual impaired societies can provide children and young people with impartial advice for example around peer support and acceptable behaviour, for example Focus Birmingham, Beacon Vision and national sight loss charity RNIB .**

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 <mailto: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.

#### **[The Centre of Expertise on Child Sexual Abuse](#)**

Has developed a range of helpful resources to identify and respond to child sexual abuse, including a [guide for professionals supporting children following incidents of HSB](#).

#### **[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.

### *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 RSHE with additional opportunities provided through assemblies, working with the Umbrella nursing project in KS5, and in bespoke 1-1 programmes for individuals.

### *Reporting*

Our learning mentor systems are well promoted and easily accessible for 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. 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.

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### *Responding to an Incident or Disclosure*

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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 pupil at the centre of all decisions made.

- The incident or issue will be reported swiftly to a DSL who will decide on next steps
- The incident or issue will be reported on My Concern

A number of actions may be appropriate depending on the nature of the incident/issue but will include

- Talking with all pupils involved
- Talking with all parents necessary
- Interventions led by Learning Mentor/Form Team/DSL

Where relevant the school will adopt a multi-agency approach and seek external support and guidance. This may include:

- LA MASH team – social services, nurses, police
- LA SHB team
- FTB or CAMHS

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### *Risk Assessment*

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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 pupils 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.

## Appendix 1: Brooke Traffic Light Indicators

### What is a Green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- Displayed between children or young people of similar age or developmental ability
- Reflective of natural curiosity, experimentation, consensual activities and positive choices

Expressing sexuality through sexual behaviour is natural, healthy and a part of growing up. Green behaviours provide an opportunity to positively reinforce appropriate behaviour, and to provide further information and support.

#### **AGE 0-5 YRS**

- Holding or playing with own genitals
- Attempting to touch or curiosity about other children's genitals
- Attempting to touch or curiosity about breasts, bottoms or genitals of adults
- Games e.g. mummies and daddies, doctors and nurses
- Enjoying nakedness
- Interest in body parts and what they do
- Curiosity about the differences between boys and girls

#### **AGE 5-9 YRS**

- Feeling and touching own genitals
- Curiosity about other children's genitals
- Curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- Sense of privacy about bodies
- Telling stories or asking questions using swear and slang words for parts of the body

#### **AGE 9-13 YRS**

- Solitary masturbation
- Use of sexual language including swear and slang words
- Having girl/boyfriends who are of the same or opposite gender
- Interest in popular culture, e.g. fashion, music, media, online games, chatting online
- Need for privacy
- Consensual kissing, hugging, holding hands with peers

#### **AGE 13-17 YRS**

- Solitary masturbation
- Sexually explicit conversations with peers
- Obscenities and jokes within the current cultural norm
- Interest in erotica / pornography
- Use of internet / e-media to chat online
- Having sexual or non-sexual relationships
- Sexual activity including hugging, kissing, holding hands
- Consenting oral and / or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- Choosing not to be sexually active

## What is an Amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy development. They may be:

- Unusual for that particular child or young person
- Of potential concern due to age or developmental differences
- Of potential concern due to activity type, frequency, duration or the context in which they occur

Amber behaviours signal the need to take notice and gather information to consider appropriate action.

Please refer to internal guidance or safeguarding frameworks to decide on the next steps to take or talk to a designated safeguarding lead.

### **AGE 0-5 YRS**

- Preoccupation with adult sexual behaviour
- Pulling other children's pants down / skirts up / trousers down against their will
- Talking about sex using adult slang
- Preoccupation with touching the genitals of other people
- Following others into toilets or changing rooms to look at them or touch them
- Talking about sexual activities seen on TV / online

### **AGE 5-9 YRS**

- Questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- Sexual bullying face to face or through texts or online messaging
- Engaging in mutual masturbation
- Persistent sexual images and ideas in talk, play and art
- Use of adult slang language to discuss sex

### **AGE 9-13 YRS**

- Uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- Verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- Exhibitionism, e.g. flashing or mooning
- Giving out contact details online
- Viewing pornographic material
- Worrying about being pregnant or having STIs

### **AGE 13-17 YRS**

- Uncharacteristic and risk-related behaviour, e.g. sudden and / or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- Concern about body image
- Taking and sending naked or sexually provocative images of self or others
- Single occurrence of peeping, exposing, mooning or obscene gestures
- Giving out contact details online
- Joining adult- only social networking sites and giving false personal information
- Arranging a face to face meeting with an online contact alone
- Accessing exploitative or violent pornography



## What is a Red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- Excessive, secretive, compulsive, coercive, degrading, or threatening
- Involving significant age, developmental, or power differences
- Of concern due to the activity type, frequency, duration, or the context in which they occur

Red behaviours indicate a need for immediate intervention and action, though it is important to consider actions carefully.

Please refer to internal guidance or safeguarding frameworks to decide on the next steps to take or talk to a designated safeguarding lead.

### **AGE 0-5 YRS**

- Persistently touching the genitals of other children
- Persistent attempts to touch the genitals of adults
- Simulation of sexual activity in play
- Sexual behaviour between young children involving penetration with objects
- Forcing other children to engage in sexual play

### **AGE 5-9 YRS**

- Frequent masturbation in front of others
- Sexual behaviour engaging significantly younger or less able children
- Forcing other children to take part in sexual activities
- Simulation of oral or penetrative sex
- Sourcing pornographic material online

### **AGE 9-13 YRS**

- Exposing genitals or masturbating in public
- Distributing naked or sexually provocative images of self or others
- Sexually explicit talk with younger children
- Sexual harassment
- Arranging to meet with an online acquaintance in secret
- Genital injury to self or others
- Forcing other children of same age, younger or less able to take part in sexual activities
- Sexual activity e.g. oral sex or intercourse
- Presence of sexually transmitted infection (STI) ☒ Evidence of pregnancy

### **AGE 13-17 YRS**

- Exposing genitals or masturbating in public
- Preoccupation with sex, which interferes with daily function
- Sexual degradation/humiliation of self or others
- Attempting/forcing others to expose genitals
- Sexually aggressive/exploitative behaviour
- Sexually explicit talk with younger children
- Sexual harassment
- Non-consensual sexual activity

Use of/acceptance of power and control in sexual relationships ☒ Genital injury to self or others

## **Appendix 2: 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 safeguarding 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 (DSL) 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](#).

### **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.)

### **What is Sexual Harassment?**

Part 5 in the [Keeping children safe in education statutory guidance \(2022\)](#) 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.

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 (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***

This section is included in the policy to help schools understand how 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.

Schools and colleges should recognise 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 below.

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. For this reason, schools should ensure they have an effective safeguarding policy which includes online safety. We suggest that this online policy is robust, up-to-date and comprehensive. [Our online safety policy is an example of good practice.](#)

#### **Key Documents**

[Department for Education: Keeping children safe in education](#)

[Department for Education: Sharing Nudes and Semi-Nudes: Advice for Education Settings working with Young People](#)

[Department for Education: Working together to safeguard children](#)

The [Everyone's Invited](#) website was created with the mission to “expose and eradicate rape culture with empathy, compassion and understanding” and to provide “a safe place for survivors to share their stories completely anonymously”; attracting thousands of testimonials about incidents that occurred in schools in the UK. This highlighted a wide range of abuse scenarios involving children abusing other children. As a result, the then Education Secretary requested a rapid review into sexual abuse in schools and colleges in England. [Ofsted published its findings in June 2021](#). This led to a series of recommendations for schools, multi-agency partners and government, and resulted in Ofsted making changes to the school inspection handbook.

**Appendix 3: HSB Risk Assessment**

**Summary**

Name of child/young person	
D.O.B.	
Any outside agency involvement	
Safeguarding concerns/context including previous behaviours/ incidents recorded and subsequent measures taken.	
SEND status	
Date of SEND Diagnosis	
Additional relevant background information <i>including known vulnerabilities, previous behaviours/ incidents recorded, and subsequent measures taken</i>	
Names and details of current professionals involved	
Date of initial risk assessment	
Review dates	

## Full Risk Assessment

Details of the incident/behaviours that have led to this risk assessment

**Describe the types of behaviour or language observed (linked to KCSIE, policy definitions)**

- Where did it happen?
- When did it happen (date and time) – is this an isolated incident or have there been multiple occurrences?
- Is anyone else involved – who and ages?
- Is there an imbalance of power?
- What was the learner's response?

**What was the response of the parents/carers when behaviour was reported to them**

**Other behavioural concerns, if any**

*E.g. Use of violence/coercion/ distracted or out of character behaviour, incidents and school and out of school, friendship/relationship concerns, disruptive behaviour, emotional wellbeing etc.*

**What are the specific sexual harmful sexual behaviour concerns?(including online)**

*Use the definitions from KCSIE to identify the behaviours*

**Evidence**

**Impact on others - who might be affected or harmed?**

Are there specific concerns about age groups, gender, vulnerable children?

**Evidence**

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<b>Identified or known potential triggers or additional risk, including online</b> <i>E.g. particular lessons, locations, activity using technology, activities, times of day, peers, staff, activity outside of school, transport home etc.</i>	<b>Strategies to mitigate risk</b> <i>E.g. Additional supervision or support, seating arrangements, specific adults that a young persons can contact, managed timetable, transport arrangements etc.</i>

Add extra rows if required

**Child's strengths, interests, positive characteristics**

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**Any current work being undertaken to support the child, eg outside agency intervention, in-school support, and how the child is responding to these measures etc.**

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**Any external agency referrals or contact made with other support agencies and support received (and how the child is responding)**

Include name of agency and contact details, support being sought and who made the referral/contact and any views that they have on the child in question

***Review***

**How will you assess whether the level of risk has changed (decreased or increased) What does the child need to work towards achieving. Avoiding?**

*E.g. Change in the child's attitudes about their behaviour, change in child or young person's approach to others, change in number and type of behavioural incidents of HSB etc.*



Date of next planned review \_\_\_\_\_

Names of those with whom the assessment is shared

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Agreed by:

Name	Role	Signature and date
	Headteacher	
	Designated Safeguarding Lead	
	Child or young person	
	Parents/Carers	
	Other Agencies	