

CHILD SEXUAL EXPLOITATION, SEXUAL VIOLENCE, HARRASSMENT AND CHILD-ON-CHILD ABUSE POLICY**Publication and Availability**

This policy applies to the whole College, including boarding provision. It is published on the College website and is available on request from the College Office. Copies may be provided in large print or other accessible formats where required to ensure accessibility for all members of the College community.

The College recognises the importance of transparency in safeguarding arrangements and ensures that students, parents, staff, volunteers and relevant external agencies are able to access and understand this policy.

Scope

This policy applies to all staff, volunteers, contractors and others working on behalf of the College, including temporary and agency staff. It applies during and outside normal College hours, including activities off site, online activity connected to the College, travel to and from College activities, community-based activity, and residential boarding arrangements.

All staff and volunteers have a responsibility to understand and implement this policy and its associated procedures. All new staff and volunteers are required to confirm that they have read, understood and will comply with this policy by signing the College Policies Register. Failure to adhere to this policy may result in disciplinary action.

This policy applies to all students, including those aged 18 and over, recognising that safeguarding responsibilities continue where there are concerns relating to welfare, exploitation, coercion, abuse or vulnerability.

Legal Status

This policy forms part of the College's safeguarding framework and supports compliance with The Education (Independent School Standards) Regulations 2014 (as amended), in particular:

- Part 3, paragraph 7, which requires proprietors to make arrangements to safeguard and promote the welfare of pupils and to have regard to statutory guidance; and
- Part 3, paragraph 10, which requires an effective strategy to prevent bullying.

This policy has regard to relevant statutory and non-statutory guidance, including Keeping Children Safe in Education, Working Together to Safeguard Children, and Sexual violence and sexual harassment between children in schools and colleges.

This policy must be read alongside the College's Child Protection and Safeguarding Policy, Behaviour Policy, Anti-Bullying Policy (including cyberbullying), Online Safety Policy, Children Missing Education procedures, Boarding policies, SEND policies, and local safeguarding partner procedures.

Monitoring and Review

Overall responsibility for this policy rests with the Principal, who ensures that safeguarding arrangements are effective, appropriately resourced, monitored and reviewed.

The policy is reviewed formally on an annual basis and additionally where there are changes in statutory guidance, local safeguarding arrangements, emerging risks, or where practice indicates a need for revision. The review considers both the content of the policy and the effectiveness of its implementation in practice.

Safeguarding data, trends, low-level concerns and contextual intelligence inform the review process. Any deficiencies or weaknesses identified are addressed promptly. Updated versions are shared with staff and made available electronically and in writing.

Reviewed: January 2026
Next Review: January 2027

Signed

David Game
Proprietor & CEO

John Dalton
Principal

Roles and Responsibilities

The Principal holds overall accountability for safeguarding and ensures that appropriate systems, staffing, training, supervision and resources are in place to support effective safeguarding practice across the College, including boarding provision.

The Head of Safeguarding and Designated Safeguarding Lead (DSL) has day-to-day operational responsibility for safeguarding and child protection. This includes receiving and managing concerns, undertaking safeguarding and contextual risk assessments, making and tracking referrals to children's social care and the Police, liaising with external agencies, maintaining secure safeguarding records, analysing safeguarding data and trends, overseeing contextual safeguarding practice, and ensuring appropriate support for all students involved.

Deputy DSLs support the DSL and act in their absence to ensure continuity, consistency and resilience in safeguarding decision-making.

All staff have a duty to safeguard students, to remain alert to signs of abuse, exploitation and harm, and to report concerns immediately in accordance with this policy. Safeguarding contact details, including out-of-hours and boarding arrangements, are maintained separately and kept up to date.

Immediate Action and Staff Response

Where a student is in immediate danger or at risk of significant harm, staff must contact the Police or emergency services without delay and inform the DSL as soon as possible.

Where a student discloses sexual violence, sexual harassment or child-on-child abuse, staff must listen carefully, remain calm, and respond in a supportive, non-judgemental manner. Staff must not investigate, must not ask leading questions, and must not promise confidentiality. Students must not be made to feel blamed, ashamed or responsible for what has happened.

A clear, factual record of the concern or disclosure must be made as soon as possible and passed to the DSL without delay. Staff must not assume that another person is dealing with a concern.

Where a concern involves online activity, staff must follow searching, screening and confiscation guidance and UKCIS advice. Staff must never view, copy, forward or store illegal images of a child.

Aims of the Policy

This policy sets out how the College prevents, identifies and responds to child sexual exploitation, sexual violence, sexual harassment and child-on-child abuse. It defines key concepts and indicators, explains safeguarding procedures, outlines how risks are minimised through a contextual safeguarding approach, and details the support available to students, including the involvement of external agencies where appropriate.

Introduction

The Proprietor, Principal, Senior Leadership Team, staff and volunteers are committed to protecting students from sexual harm and abuse, whether this occurs within the College, during boarding, off site, within the community, or online.

The College recognises that sexual harm between children is a significant and complex safeguarding issue. The College therefore adopts a preventative, whole-college and contextual safeguarding approach, recognising that harm may be influenced by peer dynamics, online platforms, physical environments, social norms and wider community factors.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of sexual abuse that involves an imbalance of power where a child under the age of 18 is coerced, manipulated or deceived into sexual activity in exchange for something the child needs or wants, or for the advantage of another person. A child may be sexually exploited even where the activity appears consensual. CSE can occur online and offline and does not always involve physical contact. It is never the fault of the child.

Indicators of possible child sexual exploitation may include unexplained gifts or money, relationships with controlling or significantly older individuals or groups, persistent unexplained absence or missing episodes, changes in emotional wellbeing or behaviour, substance misuse, sexually transmitted infections or pregnancy, and self-harm or other indicators of distress. The absence of indicators does not mean exploitation is not occurring.

Children may be particularly vulnerable due to previous abuse or neglect, unstable home environments, domestic abuse, parental substance misuse or mental health difficulties, bereavement, social isolation, disability or SEND, being in care, economic hardship, homelessness, or issues relating to sexual identity or exploration.

David Game College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Any concern that a child may be at risk of child sexual exploitation must be reported immediately to the DSL, who will consider thresholds for early help, statutory referral or Police involvement in line with professional judgement and local safeguarding arrangements.

Child-on-Child Abuse

Child-on-child abuse refers to any form of physical, sexual, emotional or financial abuse, or coercive control, exercised between children. This includes sexual violence, sexual harassment, harmful sexual behaviour, bullying (including cyber and discriminatory bullying), image-based abuse, initiation or hazing rituals, and abusive relationship behaviour.

Such abuse rarely occurs in isolation and often reflects wider safeguarding concerns, including contextual and environmental factors. The College recognises that peer abuse may be gendered but makes clear that all forms are unacceptable and will never be dismissed as banter, joking or a normal part of growing up.

Children who display harmful behaviour towards others may themselves be vulnerable and may have experienced trauma or abuse. Safeguarding responses therefore consider the needs, risks and welfare of all students involved.

Sexual Violence and Sexual Harassment

Sexual violence includes offences such as rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent. Sexual harassment refers to unwanted conduct of a sexual nature that violates dignity or creates an intimidating, hostile, degrading or offensive environment.

Sexual harassment may include sexual comments or jokes, physical interference, displaying sexualised material, non-consensual sharing of images, online harassment, coercion, threats and upskirting. Sexual violence and sexual harassment may occur online or offline and between individuals or groups.

All such behaviour is treated seriously, responded to promptly and managed as a safeguarding concern.

Consent

For the purposes of this policy, consent is understood as both a safeguarding and legal concept. Consent refers to a person's ability to make a free, informed and unpressured choice.

Consent must be given freely, can be withdrawn at any time, must be specific to each act and circumstance, and cannot be assumed from silence, passivity, previous behaviour or an existing relationship. Consent is not present where there is coercion, manipulation, pressure, intimidation or misuse of power.

Apparent agreement does not necessarily indicate consent, particularly where there is a power imbalance, peer pressure, fear of reputational harm, emotional dependency, substance use, SEND, mental health difficulties or prior victimisation.

Where staff are unsure whether consent was present, the matter must be treated as a safeguarding concern and discussed immediately with the DSL.

Contextual Safeguarding and Assessment of Behaviour

The College recognises that behaviour is shaped by peer relationships, online environments, social norms, physical spaces and wider community influences. Safeguarding therefore extends beyond individual behaviour to consider the contexts in which harm occurs.

Contextual safeguarding informs how the College assesses risk, identifies unsafe environments or peer dynamics, responds to incidents, analyses patterns and trends, and implements preventative and protective measures.

The DSL undertakes contextual risk mapping using safeguarding records, low-level concerns, student voice, staff observations and information from external agencies. Where concerns arise, safeguarding action may target individuals, peer groups, environments or systems, including supervision arrangements, use of space, boarding routines, curriculum content, online activity or staffing deployment.

Behaviour is understood as existing on a spectrum. Staff use professional judgement, consultation with the DSL and recognised tools, including the Brook Sexual Behaviours Traffic Light Tool, to inform proportionate responses. Early intervention is prioritised to prevent escalation.

Identification of Harm

Students affected by child-on-child abuse may present in a wide range of ways, including changes in attendance, behaviour, mental health, emotional wellbeing or physical health.

David Game College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Power imbalances may arise from age, social status, confidence, popularity, online exposure, disability, mental health or group dynamics. Staff are trained to remain alert to such indicators and to respond appropriately.

Prevention, Education and Culture

Through PSHEE, RSE and the wider curriculum, the College teaches students about healthy and unhealthy relationships, consent, boundaries, respectful behaviour, online safety and bystander responsibility.

Staff actively challenge language, behaviour and attitudes that normalise sexual harassment, sexism or abuse. Low-level concerns are taken seriously and addressed early to prevent escalation.

Students are encouraged to share concerns about environments, peer dynamics or online spaces that make them feel unsafe. Student voice informs preventative work and contextual safeguarding responses, and where appropriate the College feeds back on actions taken.

Parents are engaged as partners in safeguarding through communication, consultation and policy review.

Boarding and Out-of-Hours Safeguarding

This policy applies fully to boarding provision. The College maintains clear out-of-hours safeguarding arrangements, ensures safe disclosure procedures during evenings and weekends, and implements proportionate supervision, separation or accommodation adjustments where risk assessments indicate this is necessary.

Responding to Concerns and Allegations

All concerns and allegations are managed by the DSL in line with Keeping Children Safe in Education and Working Together to Safeguard Children.

Each case is considered individually, taking into account the nature and seriousness of the concern, the needs and vulnerabilities of the students involved, any power imbalance or coercion, contextual and environmental factors, and any wider safeguarding issues.

Where a criminal offence may have been committed, the DSL will liaise with the Police and children's social care. The College will not delay protective action while external investigations are ongoing.

Concerns relating to incidents that occur outside the College, including online, during evenings, weekends or holidays, are managed in accordance with this policy.

All concerns, discussions, decisions and reasons for decisions are recorded in writing and stored securely.

Risk Assessment, Information Sharing and Confidentiality

Where sexual violence or serious sexual harassment is reported, the DSL completes a written risk and needs assessment. Risk assessments consider the safety and wellbeing of the student who has reported harm, the potential risk posed by the student alleged to have caused harm, the impact on other students including witnesses, the risk of further harm or retaliation, and contextual factors linked to environments, peer groups or online spaces.

Protective measures may include adjustments to timetables, supervision, activities or boarding arrangements. Such measures are protective and precautionary and do not imply guilt.

Information is shared on a need-to-know basis to protect students. Confidentiality cannot be promised. Parents are normally informed unless doing so would place a child at increased risk of harm.

Safeguarding records are retained securely and transferred appropriately where a student moves to another education provider.

Support for Students and Witnesses

The College provides appropriate support to students affected by child-on-child abuse, including emotional support, counselling referrals, adjustments to learning or accommodation, and longer-term monitoring where required.

Students alleged to have caused harm are also supported as safeguarding concerns, with attention given to unmet needs and reducing the risk of further harm.

Students who witness sexual violence or sexual harassment are offered appropriate pastoral support, and steps are taken to prevent bullying, intimidation or retaliation.

David Game College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Disciplinary Action

Disciplinary measures may be applied alongside safeguarding actions. Any sanctions are proportionate, informed by risk assessments, and balanced against the safeguarding needs of all students.

The College recognises that some behaviours described in this policy may constitute criminal offences and will not inappropriately manage such matters solely through internal disciplinary procedures.

Exclusion is used only as a last resort where necessary to ensure safety.

False or Malicious Reports

All reports are recorded and reviewed. Where a report is found to be false or malicious, the DSL considers whether the reporting student requires support or whether the report may reflect unmet needs or previous harm.

Where appropriate, disciplinary action may be taken in line with the Behaviour Policy.

Ongoing Review, Learning and Multi-Agency Working

The College works proactively with local safeguarding partners, including children's social care, the Police and other agencies.

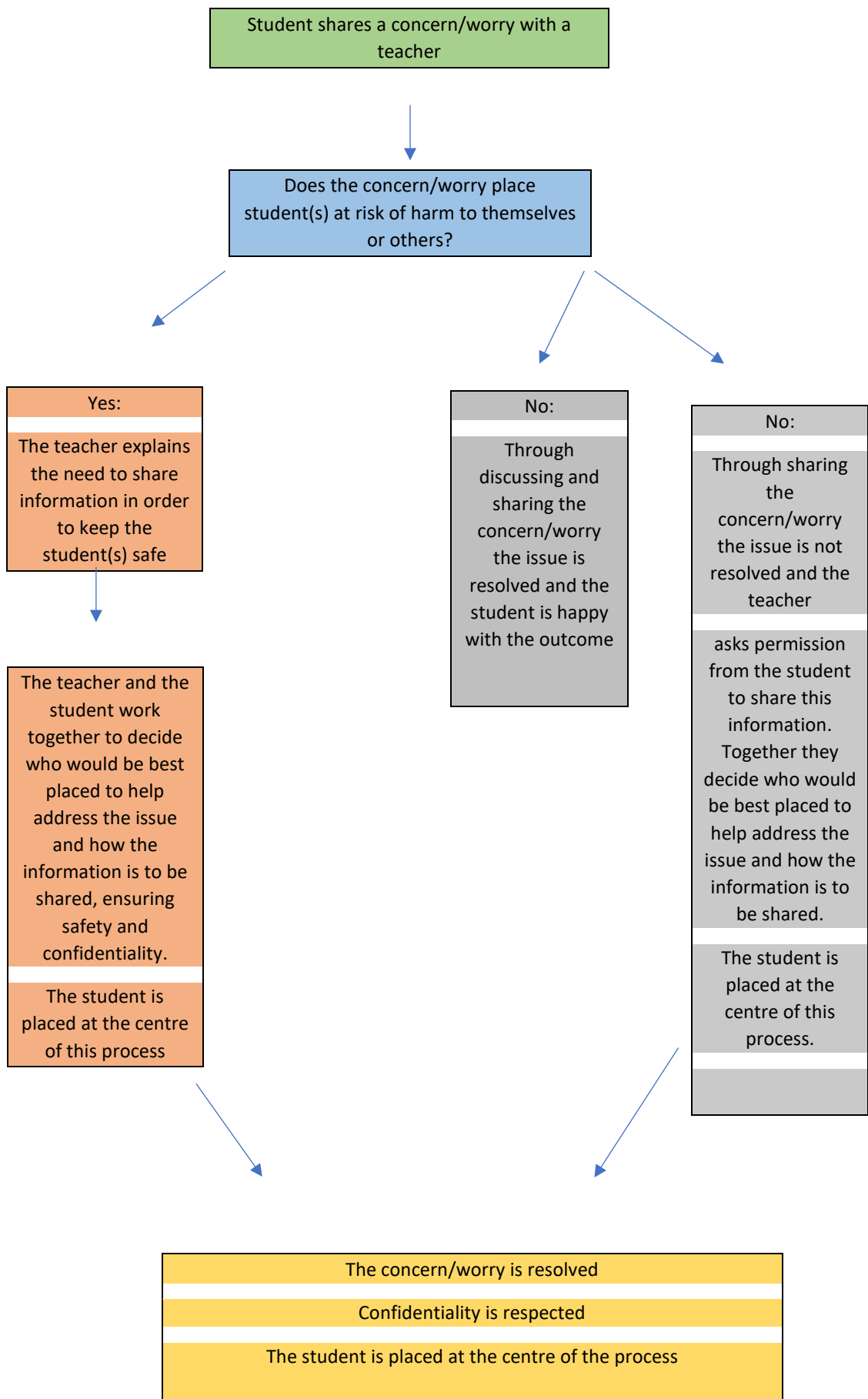
The DSL reviews safeguarding concerns collectively to identify patterns, themes and emerging risks, including contextual risks linked to environments or peer dynamics. Learning from incidents informs staff training, curriculum development, supervision arrangements and preventative work across the College.

Appendix: Youth-Produced Sexual Imagery

Any incident involving sexual imagery of a person under the age of 18 is treated as a safeguarding concern and managed in line with UKCIS guidance. Staff must not view, copy or distribute images and must report immediately to the DSL, who will determine appropriate action and escalation.

Appendix 2

Student Concern/Worry Procedure for All Issues – Inclusive of Sexual violence and sexual harassment Inc Peer on Peer Abuse



- **Appendix 3**

- **Sexual violence and sexual Harassment Protocol**

Concern or allegation is shared with a member of the David Game College faculty/staff. Case is handled sensitively, appropriately and promptly

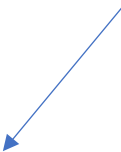


Imminent Threat of harm –
Call Police - 999

Concerns or allegation is recorded on MyConcern or concern form



DSL assigns actions and gathers information about concerns/allegation and the wider context in which they occurred. Reference is made to the Brook Traffic Light tool and Hackett's continuum of sexual behaviours presented by children



Manage Internally:
Handle concerns or Allegations internally – seek advice from external

Early Help Assessment:
Referral to CAHMS, a specialist sexual behaviour team and/or youth offending team

Refer to Social Care:
Section 17 – child in need or Section 47 statutory assessment

Report to the Police:
Alleged criminal behaviour will be reported to the police



- **Appendix 4**

- **Sexual violence and sexual harassment/HSB Record**

Case is addressed, recorded and reviewed. The purpose of the case review is to address any contextual safeguarding issues that may have arisen and to ensure that any threats to future safety are recognised and managed.

- **Section 1: Details of those involved:**

• Alleged Victim(s)

• Name	• Age	• Gender	• Grade	• HP/Advisor
•	•	•	•	•

• Alleged Perpetrator(s)

• Name	• Age	• Gender	• Grade	• HP/Advisor
•	•	•	•	•

• Section 2: Details of the incident:

• Type of Alleged Sexual violence and sexual harassment	• Date	• Type of Alleged Sexual violence and sexual harassment
<ul style="list-style-type: none"> • Sexual activity: • Rape • Oral sex • Masturbation • Kissing • Rubbing and touching • Looking at/creating sexual images • Up skirting 	•	<ul style="list-style-type: none"> • Sexual Abuse: • Forcing or enticing a child to take part in sexual activity
<ul style="list-style-type: none"> • Sexual Harassment: • Unwanted conduct of a sexual nature • Online or in person 	•	<ul style="list-style-type: none"> • Bullying: • Emotional Cultural Perceived Status • Physical Sexist Religious • Cyberbullying Sexual SEN/Disability • Racist Homophobic Verbal • Written
<ul style="list-style-type: none"> • Sexual Violence: • Rape • Assault by penetration • Intentional sexual touching 	•	<ul style="list-style-type: none"> • Banter: • Emotional Cultural Perceived Status • Physical Sexist Religious • Cyberbullying Sexual SEN/Disability • Racist Homophobic Verbal • Written

• Section 3: Location and context of the incident:

•
• Location/Context

•

- **Section 4: Outcomes**

• • Outcomes		
• • Disciplinary	• • Pastoral	• • Contextual
•	•	•

- **Appendix 5**

• Risk Assessment for David Game College		
• Risk Assessment for: Sexual violence and sexual harassment Inc Peer on Peer Abuse	•	• RA Review Date: January 2027
• Carried out by:	• Approved by: The Principals and College Wide Safeguarding Team	• RA Date: January 2026

• <u>What are the Hazards?</u>	• <u>Level of risk</u>			• <u>Who might be harmed and how?</u>	• <u>Control Measures</u>			
	• L o w	• M e d	• H i g h		• Action to be taken to lower the risk.	• Action by whom?	• Action by when?	• Level of risk reduced to low
• Bullying				• Students, through being the victim of bullying behaviour by peers, both in person and online. Such actions may also take place outside of college.	<ul style="list-style-type: none"> • David Game College will have a clear and accessible anti-bullying policy that is reviewed, minimally, on an annual basis. • David Game College will have anti-bullying coordinators in every division of the college. These people will be responsible for ensuring that David Game College follows the procedures and ethos outlined in the anti-bullying policy. • The mission and ethos of the college and SMSC development actively promotes an appreciation for diversity and respect for all cultures and people. • David Game College, will communicate to students that we do not tolerate such behaviour and what to do if you are either the victim of bullying and/or witness such acts. 	• David Game College SLT, teachers, staff, parents and students	• Ongoing throughout the college year	

					<ul style="list-style-type: none"> • David Game College will be known as a listening college and educate all faculty and staff in how to develop trusting relationships with students, thus encouraging the sharing of information and disclosure about instances of bullying. • Students will be required to read and sign our acceptable use policy, which clearly states that David Game College will not tolerate any form of cyberbullying. This information will be shared with parents. • Student leaders, across the college, will be trained as to how they should look to address all forms of bullying. 			
<ul style="list-style-type: none"> • Sexting 	•	•	•	<ul style="list-style-type: none"> • Both the victim and perpetrator of sharing youth produced sexual imagery. • Students, who have received youth produced sexual imagery but were neither the victim or perpetrator of such actions. • Such actions could have legal implications, especially if the distribution of such images took place. 	<ul style="list-style-type: none"> • David Game College will have a clear and accessible child protection and safeguarding policy and e-safety policy that is reviewed, minimally, on an annual basis. • All students, as part of the PSHEE program, will receive explicit education about sexting and the dangers that this type of behaviour can have for students, including the legal ramifications of such actions. • Faculty and staff will receive training as to how to identify issues of sexting and how to address such issues if a student should disclose such concerns. • Parents, via the college's e-safety website, parent workshops and regular updates will be informed as to how to keep their child safe online and how to support them should they be involved in any aspect of sexting. 	<ul style="list-style-type: none"> • David Game College SLT, teachers, staff, parents and students 	<ul style="list-style-type: none"> • Ongoing throughout the college year 	•

<ul style="list-style-type: none"> Sexual Harassment 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Students, who are both the victim and perpetrator of such actions, including possible legal ramifications of sexual harassment. 	<ul style="list-style-type: none"> David Game College will have a clear and accessible child protection and safeguarding policy and e-safety policy that is reviewed, minimally, on an annual basis. All students, through the PSHEE program, will be taught about healthy relationships and how to recognise and address unhealthy relationships. The mission, ethos and SMSC development of the college will promote healthy and respectful relationships. Students will be involved in the development of a referral process that encourages students to share concerns and worries about such issues. This referral process will be readily accessible to students, via the LMS and posters. Faculty and staff will be trained to recognise and address such instances of sexual harassment and to promote and role model healthy relationships. 	<ul style="list-style-type: none"> David Game College SLT, teachers, staff, parents and students 	<ul style="list-style-type: none"> Ongoing throughout the college year 	<ul style="list-style-type: none">
<ul style="list-style-type: none"> Banter 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Students, who are both the victim and perpetrator of such actions 	<ul style="list-style-type: none"> David Game College will have a clear and accessible child protection and safeguarding policy that is reviewed, minimally, on an annual basis. All college leaders, faculty/staff and student leaders will be expected to challenge all instances of: the telling of sexual stories, lewd comments, sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; 	<ul style="list-style-type: none"> David Game College SLT, teachers, staff, parents and students 	<ul style="list-style-type: none"> Ongoing throughout the college year 	<ul style="list-style-type: none">

					<ul style="list-style-type: none"> All students, through the PSHEE program, will be taught about healthy relationships and how to recognise and address unhealthy relationships. The mission, ethos and SMSC development of the college will promote healthy and respectful relationships. Students will be involved in the development of a referral process that encourages students to share concerns and worries about such issues. This referral process will be readily accessible to students, via the LMS and posters. Faculty and staff will be trained to recognise and address such instances of banter and to promote and role model healthy relationships. 			
<ul style="list-style-type: none"> Sexual violence – rape, assault by penetration and sexual assault 	<ul style="list-style-type: none"> 			<ul style="list-style-type: none"> Students, who are both the victim and perpetrator of such actions, including possible legal ramifications of sexual violence. 	<ul style="list-style-type: none"> David Game College will have a clear and accessible child protection and safeguarding that is reviewed, minimally, on an annual basis. All students, through the PSHEE program, will be taught about healthy relationships and how to recognise and address unhealthy relationships. This program will also type of behaviour can have for students, including the legal ramifications of such actions. The mission, ethos and SMSC development of the college will promote healthy and respectful relationships. Students will be involved in the development of a referral process that encourages students to share concerns and worries about such issues. This 	<ul style="list-style-type: none"> David Game College SLT, teachers, staff, parents and students 	<ul style="list-style-type: none"> Ongoing through-out the college year 	

				<p>referral process will be readily accessible to students, via the LMS and posters..</p> <ul style="list-style-type: none"> • Faculty and staff will be trained to recognise and address such instances of sexual violence and will know and understand the referral process for addressing such issues, in an empathetic and sensitive manner. 			
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• **Review of Assessment**

• Date	• Rating	• Comments	• Signature
•	•	•	•