



Managing Allegations against Pupils Policy			
Reviewed by	Hattie Henderson	Authorised by	WGB Committee
Last Review	Spring 2026	Date	January 2026
Next Review	Spring 2029	Review Cycle	3 years

Section 1 - Introduction

DfE guidance Keeping Children Safe in Education (2026) says that ‘governing bodies should ensure that there are procedures in place to handle allegations against other children’. The guidance also states the importance of minimising the risks of child on child abuse. In most instances, the conduct of pupils towards each other will be covered by the school’s behaviour policy. Some allegations may be of such a serious nature that they may raise safeguarding concerns. These allegations are most likely to include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is also likely that incidents dealt with under this policy will involve older pupils and their behaviour towards younger pupils or those who are vulnerable.

At Freegrounds Infant School we believe that all pupils have a right to attend school and learn in a safe environment. Pupils should be free from harm by adults in the school and other pupils.

We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s behaviour policy.

Section 2 – Definition of Child on Child Abuse

Child on child abuse includes physical, emotional, sexual, financial or coercive behaviours committed by one child towards another, both in person and online. This includes bullying, sexual harassment, sexual violence, exploitation, harmful sexual behaviour (HSB), sharing of sexual images, and coercive control. This aligns with national child on child abuse definitions used in recent safeguarding research and practice.

Section 3 - The safeguarding implications of sexual activity between young people

The intervention of child protection agencies in situations involving sexual activity between child on child can require difficult professional judgments. Some situations are statutorily clear – for example, a child under the age of 13 cannot consent to sexual activity. But it will not necessarily be appropriate to initiate safeguarding procedures where sexual activity involving children and young people below the age of legal consent (16 years) comes to notice. In our society generally the age at which children become sexually active has steadily dropped. It is important to distinguish between consensual sexual activity between children of a similar age (where at least one is below the age of consent), and sexual activity involving a power imbalance, or some form of coercion or exploitation. It may also be difficult to be sure that what has or has been alleged to have taken place definitely does have a sexual component.

As usual, important decisions should be made on a case by case basis, based on an assessment of the children's best interests. Referral under safeguarding arrangements may be necessary, guided by an assessment of the extent to which a child is suffering, or is likely to suffer, significant harm. Key specific considerations will include:

- The age, maturity and understanding of the children;
- Any disability or special needs of the children;
- Their social and family circumstance;
- Any evidence in the behaviour or presentation of the children that might suggest they have been harmed;
- Any evidence of pressure to engage in sexual activity;
- Any indication of sexual exploitation.

There are also contextual factors. Gender, sexuality, race and levels of sexual knowledge can all be used to exert power. A sexual predator may sometimes be a woman or girl and the victim a boy.

Section 4 - Prevention

As a school we will minimise the risk of harm and of allegations against other pupils by: -

- Delivering a developmentally appropriate PSHE and RSHE curriculum teaching respectful relationships, boundaries, consent, safety, and acceptable behaviour
- Provide clear systems for children to raise concerns safely.
- Deliver targeted work (e.g. assertiveness, emotional regulation, safe relationships) for vulnerable pupils.
- Implement risk assessments and targeted interventions for children who may pose a risk to others.
- This aligns with the whole school preventative approach endorsed in recent safeguarding frameworks.

Section 5 - Allegations against other pupils which are safeguarding issues

Occasionally, allegations may be made against pupils by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation.

To be considered a safeguarding allegation against a pupil, usually some of the following features will be found. If the allegation:

- Is made against a pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other pupils in the school
- Indicates that other pupils may have been affected by this pupil
- Indicates that people outside the school may be affected by this pupil. Examples of safeguarding issues against a pupil could include:
 - Physical Abuse
 - Violence, particularly pre-planned
 - Forcing others to use drugs or alcohol
 - Emotional Abuse

- Blackmail or extortion
 - Threats and intimidation
- Sexual Abuse
 - Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in sexting
- Sexual Exploitation
 - Encouraging other children to engage in inappropriate sexual behaviour (For example - having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight)
 - Photographing or videoing other children performing indecent acts

Section 6 – Updated section 6 Procedure (Aligned with KCSIE 2025):-

Step 1 – Immediate Action

Staff receiving an allegation must:

- Listen, reassure the child, record factual information only, and not investigate
- Inform the Designated Safeguarding Lead (DSL) without delay

Step 2 – Safeguarding Assessment by DSL

The DSL will:

- Assess whether the allegation meets the threshold for child on child abuse
- Refer to Children's Services where necessary
- Consult the police via the Multi-Agency Safeguarding Hub if a criminal offence may have been committed

These steps reflect statutory duties under KCSIE2025. [assets.pub...ice.gov.uk]

Step 3 – Informing Parents

Parents/carers of both children (alleged victim and child of concern) must be informed, unless doing so puts a child at increased risk (as outlined in KCSIE)

Step 4 – School Response

Depending on the outcome from safeguarding partners, the school may:

- Apply behaviour policy consequences (including temporary suspension)
- Carry out a full school investigation when neither police nor social care take the case.

Step 5 – Risk Assessment & Safety Planning

Where risk remains, the school will create a Child on Child Safety Plan, including:

- Supervision adjustments
- Support for the alleged victim
- Support and intervention for the child of concern
- Review dates and monitoring

This aligns with the national child on child abuse responsibilities.

Section 7 – Recording and Information Management

The DSL must ensure:

- Records clearly detail allegations, decisions, actions and outcomes
- Files for all pupils contain relevant safeguarding documentation
- Information is shared following KCSIE 2025's reinforced expectations around data protection, filtering/monitoring, and multi-agency working. [\[learning.n...pcc.org.uk\]](https://www.pcc.org.uk/learning-n...)

Section 8 – Online Harms and Technology Related Allegations

KCSIE 2025 includes enhanced clarity regarding online risks, including misinformation, digital coercion, and AI related risks. School must:

- Treat online allegations with the same seriousness as offline
- Consider device searches, filtering, monitoring and digital safeguarding responsibilities

Section 9 – Review Cycle

This policy will be reviewed every 3 years or sooner if statutory guidance changes.

Version Control	V2 January 2026 Policy updated with Managing Allegations guidance
-----------------	--