

DRAFT

Anti-Bullying Policy

Contents

1. Aims.....	3
2. Ethos Statement	3
3. The Trust's Responsibilities	4
4. Identifying Bullying	5
5. Possible Signs.....	8
6. Staff Responsibilities/duties in the event of a bullying incident	9
7. Teaching/Support Staff	9
8. Board of Directors	10
9. What a student should do if they are being bullied.....	10
10. The aims of the HAT anti-bullying strategies and intervention systems are:.....	10
11. Training	10
12. Individual Academy Policy Statements.....	11
12.1. Sir Christopher Hatton Academy implementation statement:.....	11
12.2. Victoria Primary Academy implementation statement:	12
12.3. Oakway Academy implementation statement:.....	13
12.4. Ecton Village Primary Academy implementation statement:.....	14
12.5. Earls Barton Primary School is committed to:	15
Appendix 1 – Sharing nudes and semi-nudes.....	18

1. Aims

Hatton Academies Trust is a diverse and inclusive community based upon mutual acceptance, respect and values. Bullying, intimidation and harassment of any member of our community are examples of unacceptable behaviour and as such reference is made to the Behaviour and Online Safety policies. Staff record incidents and set sanctions for all forms of bullying as they do for all other negative behaviours. For detail on the range sanctions available please refer to the Behaviour Policy and Online Safety Policies.

Terminology

For the purposes of this policy, the term academy refers to any educational establishment within Hatton Academies Trust and includes academies and schools.

References to Principal within this policy include the Headteacher or Head of School where these titles are used within individual settings.

2. Ethos Statement

Everybody has the right to be treated with respect and to learn in a safe and orderly environment.

We want this policy to:

- Demonstrate that Hatton Academies Trust (HAT) takes bullying, intimidation and harassment in all of its forms seriously and that it will not be tolerated. In all incidences this policy is for the protection of the entire community including students, staff and visitors and is represented directly through the student body at each academy including at Sir Christopher Hatton Academy with the Student Charter, prepared by The Diana Award Anti Bullying Committee
- Take measures to prevent all forms of bullying during school time and during off-site activities, including online safety (please also see the Online Safety and Behaviour and policies)
- Support everyone in reporting and identifying bullying, to protect those who might be bullied or otherwise feel vulnerable and to educate the aggressors who are involved
- Demonstrate to all that the safety and happiness of pupils and staff is enhanced by dealing positively with bullying, and that this encourages mental wellbeing and good mental health
- Further promote an environment where it is acceptable to tell someone about bullying and negative behaviours which affect wellbeing without fear of recrimination or judgement
- Promote positive attitudes and values throughout the HAT community
- Promote positive relationships and the understanding that every member of the HAT community has a responsibility towards the prevention of bullying /

discrimination through an ethos of, “everyone has the right to be themselves and be treated with respect”

- Reduce instances of derogatory or discriminatory language throughout the entire HAT community, through high expectations, role modelling, reporting and the use of sanctions where necessary.

3. The Trust's Responsibilities

As a Trust we have measures and procedures to fulfil our moral and statutory responsibilities as outlined in:

Malicious Communications Act 1988 which specifies that any person who sends an electronic communication which conveys a message which is indecent or grossly offensive, a threat, or information which is false and known or believed to be false by the sender, is guilty of an offence if their purpose in sending it was to cause distress or anxiety to the recipient.

Children Act 1989 If there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' the incident should be addressed as a child protection concern. Academy staff will discuss with the school's designated safeguarding lead and, where appropriate, they will report their concerns to their local authority children's social care and work with them to take appropriate action. Where there is no reasonable cause to suspect the suffering or the likelihood of suffering significant harm the academy may need to draw on a range of internal and external services to support the pupil who is experiencing bullying, or to tackle any underlying issue which has contributed to a child engaging in bullying.

The Education and Inspections Act 2006 Section 89 provides that schools must have measures to encourage good behaviour and prevent all forms of bullying amongst pupils. These are part of this and the school's behaviour policy which is communicated to all pupils, school staff and parents including via the academy website.

The Equality Act 2010 A key provision is the Public Sector Equality Duty (PSED), which came into force on 5 April 2011, covers age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It requires public bodies to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act
- advance equality of opportunity between people who share a protected characteristic and people who do not share it
- foster good relations between people who share a protected characteristic and people who do not share it.

Academies will follow the latest DfE Searching, Screening and Confiscation Guidance when considering the search, examination or confiscation of electronic devices.

The Education (Independent School Standards) Regulations 2014 The proprietor of an Academy or other independent school ensures that bullying at the school is prevented in so far as reasonably practicable, by the drawing up and implementation of an effective anti-bullying strategy, as outlined in this policy.

The Trust's Responsibilities With Regards to Incidents Outside of School Hours

Sections 90 and 91 of the Education and Inspections Act 2006 state that a school's disciplinary powers can be used to address pupils' conduct when they are not on school premises and are not under the lawful control or charge of a member of school staff, (if it would be reasonable for the school to regulate pupils' behaviour in those circumstances). This includes bullying incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in a town centre.

Where incidents occurring outside school are reported to the academy, the academy will consider whether the matter has a clear impact on pupils' safety, wellbeing or behaviour within school, or whether it raises safeguarding concerns or involves potential criminality. Where appropriate, the academy will take reasonable and proportionate action in accordance with its behaviour and safeguarding procedures.

The Trust recognises that many online incidents occur outside school hours through personal devices, social media platforms and messaging applications. Parents and carers are responsible for monitoring and supervising their child's access to digital technologies, including compliance with platform age restrictions and family expectations regarding device use.

Where online behaviour occurring outside school has a direct impact on the safety, wellbeing or education of pupils within school, or raises safeguarding concerns, the academy may take reasonable action. However, the academy cannot investigate or resolve every dispute, disagreement or inappropriate interaction that occurs through social media or personal devices outside school. Parents and carers may be directed to the platform provider, police or other appropriate agencies where responsibility sits outside the school's remit.

The academy will only impose disciplinary sanctions (and implement that sanction) on the school premises or when the pupil is under the lawful control of academy staff such as on a school trip.

4. Identifying Bullying

Bullying is behaviour by an individual or group, repeated over time, that intentionally causes physical, emotional or psychological harm to another individual or group. Bullying often involves an imbalance of power, whether real or perceived, and may occur face-to-face, online or through the use of technology.

Bullying can take many forms, including physical, verbal, relational, prejudice-related and cyberbullying. It may be motivated by actual or perceived differences, including protected characteristics such as race, religion or belief, disability, sex, sexual orientation or gender reassignment, or because a child is looked after, previously looked after, adopted, has caring responsibilities, has special educational needs and/or disabilities, or is otherwise vulnerable.

Some incidents of bullying may also constitute child-on-child abuse or raise wider safeguarding concerns and should be considered in line with the Trust's Child Protection Policy and Procedures.

What Bullying Is Not

Whilst all unkind, inappropriate or harmful behaviour will be taken seriously, not all conflict or negative behaviour constitutes bullying.

The following, whilst still requiring support, intervention or sanctions where appropriate, would not normally be considered bullying in isolation:

- occasional disagreements between friends;
- one-off arguments or disputes;
- isolated incidents of unkind behaviour;
- age-appropriate friendship difficulties and social disagreements;
- accidental hurt or offence;
- rough-and-tumble play which is not intended to cause harm;
- a single incident of inappropriate behaviour without evidence of repetition or power imbalance.

Academy staff will exercise professional judgement when determining whether behaviour meets the definition of bullying.

Bullying as a Safeguarding Concern

Whilst not all bullying will constitute abuse, bullying may be linked to safeguarding concerns and, in some cases, may form part of child-on-child abuse. Where bullying involves:

- sexual harassment or sexual violence
- prejudice-related incidents or hate incidents
- repeated targeting of vulnerable pupils
- serious emotional harm
- online exploitation or coercion
- threats, intimidation or criminal behaviour

Staff will consider whether safeguarding procedures should be followed in addition to behaviour procedures and consult the DSL immediately.

Staff must be alert to harmful attitudes and behaviour linked to misogyny, misandry, incel ideology and online extremism, recognising that these may contribute to bullying, harassment or abusive behaviours.

The Trust recognises that some groups of children may be disproportionately affected by bullying, including:

- pupils with SEND
- looked after and previously looked after children
- pupils with social workers
- young carers

- pupils questioning their gender identity
- LGBTQ+ pupils
- pupils from minority ethnic or faith communities
- children experiencing domestic abuse

Additional support, monitoring and intervention may be required.

Bullying may be motivated by prejudice, discrimination or hate towards a protected characteristic including:

- race
- religion or belief
- disability
- sex
- sexual orientation
- gender reassignment
- pregnancy or maternity

All incidents of prejudice-related bullying or hate-related behaviour will be recorded and monitored separately.

No form of bullying, harassment or intimidation will be tolerated within the HAT academies; this includes the use of any kind of discriminatory language.

ALL parents and carers, staff and students need to be vigilant, looking out for the following and reporting incidents using the relevant behaviour policy for their specific HAT setting.

Bullying can be/include:

- **Physical:** involving pushing, punching, hitting or kicking
- **Verbal:** involving name calling, teasing, taunting and threatening
- **Silent Exclusion:** involving the isolation of the victim by ignoring him or her or by excluding him or her from group activities (may be as a result of conflict within a friendship group and/or refusal to accept a request for a youth produced sexual image etc.)
- **Emotional:** being unfriendly, excluding, tormenting, undermining
- **Racist:** racial taunts, graffiti, gestures
- **Sexual:** unwanted physical contact, sexually abusive comments or demands for sexually explicit images ("Youth produced sexual imagery" – may also be cyber)
- **Homophobic:** because of or focussing on the issue of sexuality or sexual preference
- **Biphobic:** because of or focussing on the issue of sexuality or sexual preference
- **Transphobic:** because of or focussing on the issue of gender identity or gender preference
- **Cyber:** abuse conducted through digital technologies, including social media, messaging applications, gaming platforms, livestreaming services,

- image or video sharing, AI-generated imagery, deepfakes, group chats, anonymous messaging services and other online environments.
- Image-based abuse: sharing, manipulating, creating or threatening to share photographs, videos or AI-generated images to embarrass, harass, intimidate or control another person.
- **Stealing:** taking other students' property without their permission.

The forms that bullying can take include:

- **Rude gestures or mimicry** of any kind
- **Deliberate damage** to the victim's property
- **Taking property** without permission
- **Extortion** of money, sweets or other belongings
- **Malicious gossip**, negative 'banter' or the purposeful generation/spread of rumour (including online/text)
- **Forcing (coercion)** the victim to do something against their will (e.g. see "Sexual" above)
- **Gangs or groups** of students who gather in large groups with the sole purpose of intimidation
- **Holding power** over other students by the use of intimidation

5. Possible Signs

Adults and students must be aware of these possible signs and that they should investigate as appropriate and inform the Anti-Bullying Lead if anybody shows any of these signs. These possible warning signs could include:

- Being frightened of travelling to or from the academy or asks to be driven
- Changes their usual routine
- Begins to truant/attendance patterns change
- Becomes withdrawn, anxious or lacking in confidence
- Attempts/threatens suicide
- Runs away
- Cries themselves to sleep, has nightmares or starts sleepwalking/ bedwetting
- Performance deteriorates
- 'Loses' possessions inexplicably
- Asks for extra money or starts stealing
- Has unexplained cuts or bruises (including self-harm)
- Becomes aggressive, disruptive or unreasonable
- Starts bullying others
- Reduced emotional wellbeing, deteriorating mental health, feeling down etc.
- Stops eating
- Is afraid to use internet /phone or is nervous when a call is received
- Is nervous or jumpy when a cyber/text message or call is received
- Spends too much of time in school alone

These signs and behaviours could indicate other problems, but bullying should be considered. (Also see the Behaviour and Online Safety policies).

6. Staff Responsibilities/duties in the event of a bullying incident

All Staff are expected to:

- Know the policy and current academy procedures (also the Behaviour, and Online Safety policies)
 - Be observant and ask students what is happening to them and follow up with a student after an incident
 - Be aware of the signs of changes in emotional wellbeing and mental health and report via CPOMS / MyConcern
 - Deal with incidents according to the policies and seek support from the Anti-Bullying Coordinator, Heads of Year or a Senior member of staff as required
 - Never let any incidence of bullying or use of derogatory/discriminatory language pass by unreported, whether on-site or during an off-site activity
 - Work with the Anti-Bullying Coordinator or relevant Senior Leader to set appropriate sanctions for the perpetrator
 - Participate in the anti-bullying and online safety training to keep abreast of local and national developments
 - Participate in Life Skills/PHSE/Citizenship and / or other personal development curricular activities offered by their academy setting
- Any incident involving sexual harassment, sexual violence, image sharing, prejudice-related bullying, hate incidents, exploitation concerns or significant emotional harm must be treated as a safeguarding concern and recorded in accordance with the Child Protection Policy.

7. Teaching/Support Staff

All members of staff are responsible for dealing with issues of bullying which they witness or that are reported to them by any pupil, seeking support from the Anti-Bullying Coordinator or Senior Leader as required. Any issue must be reported (through the system relevant to the specific academy setting) promptly and be dealt with using the Academy's Behaviour policy (and where necessary with reference to the Online Safety policy).

- In all cases incidents will be recorded by staff (see above) – including the name of the aggressor/s, victim/s and a full description of the incident including the time of day that the incident occurred and the actions taken by the reporting member of staff
- Parents and carers will be informed as necessary and they may be asked to attend a meeting to discuss the problem
- If necessary (and appropriate) the police and or external agencies will be consulted e.g. for incidents involving indecent images of minors or threats through social media (see appendix)
- Issues will be dealt with promptly. Relevant accounts will be obtained from those involved and any witnesses, where appropriate. The method used to gather information will be determined by the nature of the incident and may include verbal discussions, written statements or other appropriate evidence-gathering approaches.

- A serious attempt will be made to help the perpetrator change their behaviour (through interventions, restorative justice, anger management training, peer mentoring etc.)

8. Board of Directors

The Principal will liaise with the relevant senior staff over all anti-bullying strategies and individual cases where appropriate. The CEO will discuss, review and endorse agreed strategies to evaluate their effectiveness.

9. What a student should do if they are being bullied

They must tell someone – a member of staff/an adult in their class / member of the peer support team. If a pupil is unsure about whether they are being bullied or not, they should still tell someone. Pupils should be supported to retain screenshots, online messages and other digital evidence where safe to do so and report concerns to a trusted adult immediately.

10. The aims of the HAT anti-bullying strategies and intervention systems are:

- To prevent, de-escalate and/or stop any continuation of harmful/inappropriate behaviour
- To safeguard our students, visitors and staff
- To react to incidents in a prompt, reasonable, proportionate and consistent way
- To safeguard any victim who has experienced bullying/harassment and to trigger appropriate sources of support
- To apply disciplinary sanctions to anyone causing or instigating bullying and ensure they learn from the experience, possibly through multiagency support and /or disciplinary action
- To make the use of discriminatory language and inappropriate use of E-communications unacceptable across HAT. (See the HAT Online Safety policy).
- We proactively gather intelligence from a number of sources about any issues between students which might cause conflict as well as developing strategies to prevent bullying occurring in the first place. This involves talking to students about issues of difference, perhaps in lessons, through dedicated events and projects, through assemblies, resilience building, the development of social responsibility and through initial support programmes for vulnerable students, for example. We actively encouraging a culture of mutual respect, community and tolerance.

11. Training

The Trust is committed to providing relevant, comprehensive training to all staff regarding Anti-Bullying best practice and will create opportunities for this to happen through training days, staff meetings, briefings and twilight sessions as required.

12. Individual Academy Policy Statements

All academies operate in accordance with the Trust Anti-Bullying Policy. The following academy statements identify local procedures, named personnel and academy-specific arrangements that complement, but do not replace, the requirements of this policy.

12.1. Sir Christopher Hatton Academy implementation statement:

At Sir Christopher Hatton Academy, every student has the right to learn in a safe, inclusive and supportive environment. Guided by our commitment to Excellence, Aspiration, Achievement, Inspiration and Community, we nurture positive relationships and empower all members of Team Hatton to stand against bullying in all its forms. Through the development of our Hatton Character Qualities, including empathy, responsibility, resilience, social intelligence, citizenship and courage, we encourage students to treat others with kindness, respect and understanding. We take all concerns seriously and act swiftly and effectively to resolve issues, ensuring that every student can flourish, achieve their potential and feel valued as part of our academy community.

Academy Anti-Bullying Lead(s)

Name(s): Kate Peel

Contact: peelk@hattonacademy.org.uk

How pupils can report concerns

- Trusted adult which is collected through the whole school and can be found on SIMs
- DSL
- Anti-bullying coordinator: Kate Peel
- Email teaching staff/Head of year

How incidents are recorded

- Class Charts / CPOMS
- Who monitors incidents: Pastoral team overseen by K Peel
- Frequency of review- Every term with actions and a report to Co-Principals

Support available for pupils

- A quiet space during Break and Lunch (B1, Library) with pastoral support
- Trained welfare and pastoral team
- Restorative work
- Pastoral support
- ELSA
- Counselling

- Peer mentoring

Prevention and education

- Assemblies
- RSHE/PSHE
- Anti-Bullying Week
- Online safety education
- Student leadership opportunities
- We are proactive and adopt our PSHE/assembly process if we have a concern that arises

Monitoring and evaluation

- Data analysis
- Student voice
- Parent feedback
- Safeguarding review

12.2. Victoria Primary Academy implementation statement:

At Victoria we are committed to creating a safe, inclusive and nurturing school environment where every child feels safe, respected and supported. Through the promotion of our school values, alongside a culture of kindness, empathy and mutual respect, we aim to prevent bullying, foster positive relationships and empower all members of our community to challenge unacceptable behaviour. We are committed to ensuring that any bullying concerns are addressed promptly and effectively so that all pupils can feel safe, confident and able to thrive.

Academy Anti-Bullying Lead(s)

Name(s): Ian Pearson, Liz Meredith, Natasha Thomas, Katie Osborne, Hope Preston

Contact: Anti-Bullying@victoriaprimaracademy.org.uk

How pupils can report concerns

- Trusted adult
- DSL
- Anti-bullying ambassador
- Worry box
- Email address
- Online form

How incidents are recorded

- Class Charts / CPOMS

- Bullying incidents are monitored regularly, alongside weekly monitoring of behaviour across the school. All reported incidents are formally reviewed at the end of each academic term to identify patterns, trends and any areas requiring further action or support. This is reviewed by 2 Anti-Bullying leads.

Support available for pupils

- Restorative work
- Pastoral support
- ELSA
- Counselling
- Peer mentoring
- Buddy systems

Prevention and education

- Assemblies
- RSHE/PSHE
- Anti-Bullying Week
- Online safety education
- Student leadership opportunities

Monitoring and evaluation

- Data analysis
- Student voice
- Parent feedback
- Safeguarding review

12.3. Oakway Academy implementation statement:

At Oakway Academy, every pupil has the right to learn in a safe, inclusive, and supportive environment. Grounded in our Academy Values and Character Qualities, we foster strong relationships and empower our entire community to stand up against bullying. We take all concerns seriously, acting swiftly and decisively to resolve issues so every child can thrive and enjoy their time at school.

Academy Anti-Bullying Lead(s)

Name(s): Ben Lacy

Contact: b.lacy@oakwayacademy.org.uk

How pupils can report concerns

- Trusted adult: Class teacher or year group TA, Staff Champion
- DSL: J Hollingsworth (Principal), A Aitken (Head of School), R Owen (Lead DSL), K Underwood, T Needs, D Retter, L Nash, T Pugh, J Gordon.
- Worry boxes; there is a physical one in each classroom and an anonymous online one on the school website

How incidents are recorded

- All records related to bullying, safeguarding and behaviour are recorded CPOMS

- Who monitors incidents: the DSL monitors CPOMS regularly throughout each day and triages concerns. The behaviour lead triages behaviour concerns daily and collates a fortnightly summary of patterns and trends. These feed into SLT support, PSHE lessons, assemblies, intervention / behaviour support plans/ informal or formal parent meetings.
- Frequency of review: daily and fortnightly

Support available for pupils

- Restorative work
- Pastoral support; staged response: coaching in the moment; parental support
- ELSA support Drawing and Talking; Lego therapy, bespoke Protective Behaviours work
- Buddy systems
- Sensory Room intervention
- Champion plans

Prevention and education

- Assemblies
- RSHE/PSHE
- Anti-Bullying Week
- Online safety education
- Flourishing Leaders: School Council, Anti-Bullying Ambassador, Eco-Warrior, Maths Champion, Junior Librarian, Reading Champion

Monitoring and evaluation

- Data analysis
- Engagement Audit
- Student voice
- Parent feedback
- Safeguarding review

12.4. Ecton Village Primary Academy implementation statement:

At our small village school, we are dedicated to providing a happy, safe and welcoming environment where every child is known, valued and encouraged to flourish. Through our core values of Independence, Resilience, Excellence, Ambition, Co-operation and Honesty, we promote kindness, mutual respect and a strong sense of community. We aim to build confidence and positive relationships, empowering pupils to make responsible choices and stand up to unacceptable behaviour. We are committed to addressing any concerns promptly and effectively, ensuring that all children feel secure, supported and able to achieve their full potential.

Academy Anti-Bullying Lead(s)

- Name(s): Michelle Gould (Head of School)
- Contact:gouldm@ectonvillageacademy.org.uk

How pupils can report concerns

- Trusted adult – PSHE and protective behaviours work will identify those adults which the children feel safe and supported by.
- DSL – Michelle Gould
- Contact details and online contact form via the website.
- Class Worry boxes reviewed by the teachers and reported as appropriate.

How incidents are recorded

- All incidents relating to safeguarding, behaviour and bullying (proven or otherwise) are recorded via CPOMS
- The DSL receives regular notifications and monitors incidents on CPOM's throughout the school day. Half termly review by head of school of reported incidents also takes place to inform further teaching and schoolwide priorities.
- As above, all incidents are reviewed at least daily and patterns for individuals, groups or whole school reviewed termly.

Support available for pupils

- Restorative work
- Pastoral support which may include in the moment emotion coaching or more intense intervention.
- ELSA – this is accessed via another trust school as appropriate.
- Buddy systems are used across school and also during social times and learning times where a child would benefit from this support.
- Individual behaviour support plans including strategies and additional support available to the child.

Prevention and education

- Assemblies
- RSHE/PSHE
- Anti-Bullying Week
- Online safety education
- Student leadership opportunities

Monitoring and evaluation

- Data analysis
- Student voice
- Parent feedback
- Safeguarding review

12.5. Earls Barton Primary School is committed to:

At EBPS we are committed to creating a safe, inclusive and nurturing school environment where every child feels safe, respected and supported to achieve their personal best. Through the promotion of our school values of Self belief, Honesty, Respect, Excellence and Kindness alongside the promotion of integrity, we aim to prevent bullying, foster positive relationships and empower all members of our

community to challenge unacceptable behaviour. We are committed to ensuring that any bullying concerns are addressed promptly and effectively so that all pupils can feel safe, confident and able to thrive.

Academy Anti-Bullying Lead(s)

Name(s): Michelle Gould (Deputy Head & behaviour Lead)

Contact: m.gould@eb-pri.northants.sch.uk

How pupils can report concerns

- Trusted adult: a new helping hands document is completed every September as part of protective behaviours work in a focussed week
- DSL: Marie Lally
- Worry boxes; there is a physical one in each classroom and an anonymous online one on the school website
- form

How incidents are recorded

- All records related to bullying, safeguarding and behaviour are recorded MyConcern
- Who monitors incidents: the DSL monitors MyConcern regularly throughout each day and triages concerns. The behaviour lead triages behaviour concerns daily and collates a half-termly summary of patterns and trends. These feed into PSHE lessons, assemblies, intervention / pastoral support / the timetable for the Base and BSW and playtime support plans / interventions.
- Frequency of review: daily and termly

Support available for pupils

- Restorative work
- Pastoral support; staged response: coaching in the moment; coaching programme; coaching with parents
- ELSA support Drawing and Talking; Lego therapy, bespoke Protective Behaviours work
- Buddy systems
- The Base – a social space open every breaktime and lunchtime
- Individual pastoral support plans

Prevention and education

- Assemblies
- RSHE/PSHE

- Anti-Bullying Week
- Protective Behaviours week
- Online safety education
- Student leadership opportunities: Sports Crew

Monitoring and evaluation

- Data analysis
- Student voice
- Parent feedback
- Safeguarding review

Appendix 1 – Sharing nudes and semi-nudes

The sharing of nude or semi-nude images, videos or live streams by or involving children is a safeguarding concern that may constitute child-on-child abuse. Such incidents require an immediate and proportionate safeguarding response and must be managed in accordance with the Trust's Child Protection Policy and Procedures.

All staff should be aware that:

- Sharing nudes and semi-nudes can occur online or offline and may be consensual or non-consensual.
- Children may be pressured, coerced, manipulated or exploited into creating or sharing images.
- Incidents involving nude or semi-nude imagery may be linked to bullying, sexual harassment, sexual violence, child sexual exploitation, child criminal exploitation or online abuse.
- The primary concern should always be the welfare, protection and support of the child or children involved.
- Staff must not copy, print, save, share or forward indecent images of children unless specifically advised to do so by the police.
- Any concern must be reported immediately to the Designated Safeguarding Lead (DSL) and recorded in accordance with the Trust Child Protection Policy and Procedures.

Further guidance on managing incidents involving nude or semi-nude imagery can be found in:

1. Hatton Academies Trust Child Protection Policy and Procedures – Section B5: Child-on-Child Abuse and "Making of Semi-Nudes or Nudes".
2. UK Council for Internet Safety (UKCIS) – Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People
 - <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>
3. Keeping Children Safe in Education 2026
 - Keeping Children Safe in Education

Any incident involving the sharing of nudes or semi-nudes will be managed in accordance with the procedures outlined in the HAT Child Protection Policy and Procedures and relevant national guidance, with safeguarding considerations taking precedence over disciplinary action.

Difficulties in defining harmful sexual behaviours displayed by children and young people are made worse by a general lack of knowledge of childhood sexuality and what constitutes normal sexual development. The Hackett (2012) continuum of children and young people's sexual behaviours (fig.1) shows how behaviours exist on a continuum from normal to highly abnormal.

A continuum of behaviours

It is vital for professionals to distinguish normal from abnormal sexual behaviours. Chaffin et al (2002, p208) suggest a child's sexual behaviour would be considered abnormal if it:

- occurs at a frequency greater than would be developmentally expected
- interferes with the child's development
- occurs with coercion, intimidation or force
- is associated with emotional distress
- occurs between children of divergent ages or developmental abilities
- repeatedly recurs in secrecy after intervention by caregivers

Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:

Normal	Inappropriate	Problematic	Abusive	Violent
• Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making	• Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal	• Problematic and concerning behaviours • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity	• Victimising intent or outcome • Included misuse of power • Coercion and force to ensure victim compliant • Intrusive • Informed consent lacking, or not able to be freely given by victim • May include elements of expressive violence	• Physically violent • Highly intrusive • Instrumental violence which is physiologically and/or sexually arousing to the perpetrator • Sadism

fig 1: Hackett continuum of behaviours²³