

PEER-ON-PEER ABUSE POLICY



THE ARTHUR ELLIS
MENTAL HEALTH FOUNDATION

OVERALL SAFEGUARDING STATEMENT

KEEPING EVERYONE SAFE

AEMHF: Mental Health Support (AEMHF, also known as Arthur Ellis Mental Health Support and The Company throughout this statement) works with a diverse community of individuals ranging from children, young people and adults referred to as 'clients'. Clients on the Mentoring scheme – given their need for Mentoring – are all considered vulnerable. AEMHF Staff refers to any member of AEMHF personnel regardless of position. This includes but is not exclusive to employees, volunteers, student placements, visitors, contractors, and agency staff.

Safeguarding these vulnerable groups is everybody's responsibility. The policy applies to all staff at AEMHF and it is consistent with the procedures of our hometown; Milton Keynes Safeguarding Board (MKSB) or the relevant area that the client is living in. The policy and procedures also apply to offsite activities.

Our DSL and Deputies are:

- Heather Horner DSL
- Elle Walker, DSO

They can be contacted on safeguarding@arthurellismhs.com.

OVERALL SAFEGUARDING STATEMENT

EQUALITY STATEMENT

Some clients have an increased risk of abuse and additional barriers can exist for them with respect to recognising or disclosing it. AEMHF are committed to act against discriminatory practice and recognise client's diverse circumstances and where there may be additional potential vulnerabilities. AEMHF shall ensure that all clients have the same protection, regardless of any barriers they may face.

There is special consideration to clients who:

- Have special educational needs or disabilities,
- Are young carers,
- May experience discrimination due to their race, ethnicity, religion, gender identification and sexuality,
- Have English as an additional language,
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse,
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation, or
- Are asylum seekers.

PEER-ON-PEER ABUSE POLICY

INTRODUCTION

Peer-on-Peer abuse is also known as child-on-child abuse. For this policy where 'children' are referred to – this term includes young people under the age of 18 years old.

AEMHF recognises that children are vulnerable to and capable of abusing their peers. We take such abuse as seriously as abuse perpetrated by an adult. This includes verbal as well as physical abuse. Peer-on-peer abuse will not be tolerated or passed off as part of “banter” or “growing up”.

This policy applies to all staff regardless of their position in AEMHF. The policy will:

- Set out our strategies for preventing, identifying and managing peer on peer abuse,
- Take a contextual approach to safeguarding all children and young people involved, and
- Acknowledging that children who have allegedly abused their peers or displayed harmful sexual behaviour are themselves vulnerable and may have been abused by peers, parents or adults in the community.

We are committed to ensuring the prevention, early identification, and appropriate management of peer-on-peer abuse. All staff regardless of their position in AEMHF, are



expected to have read sexual violence and sexual harassment advice alongside our Child Protection Statement and Policy.

In cases where peer on peer abuse is identified we will follow our child protection procedures, taking a contextual approach to support all children and young people who have been affected by the situation.

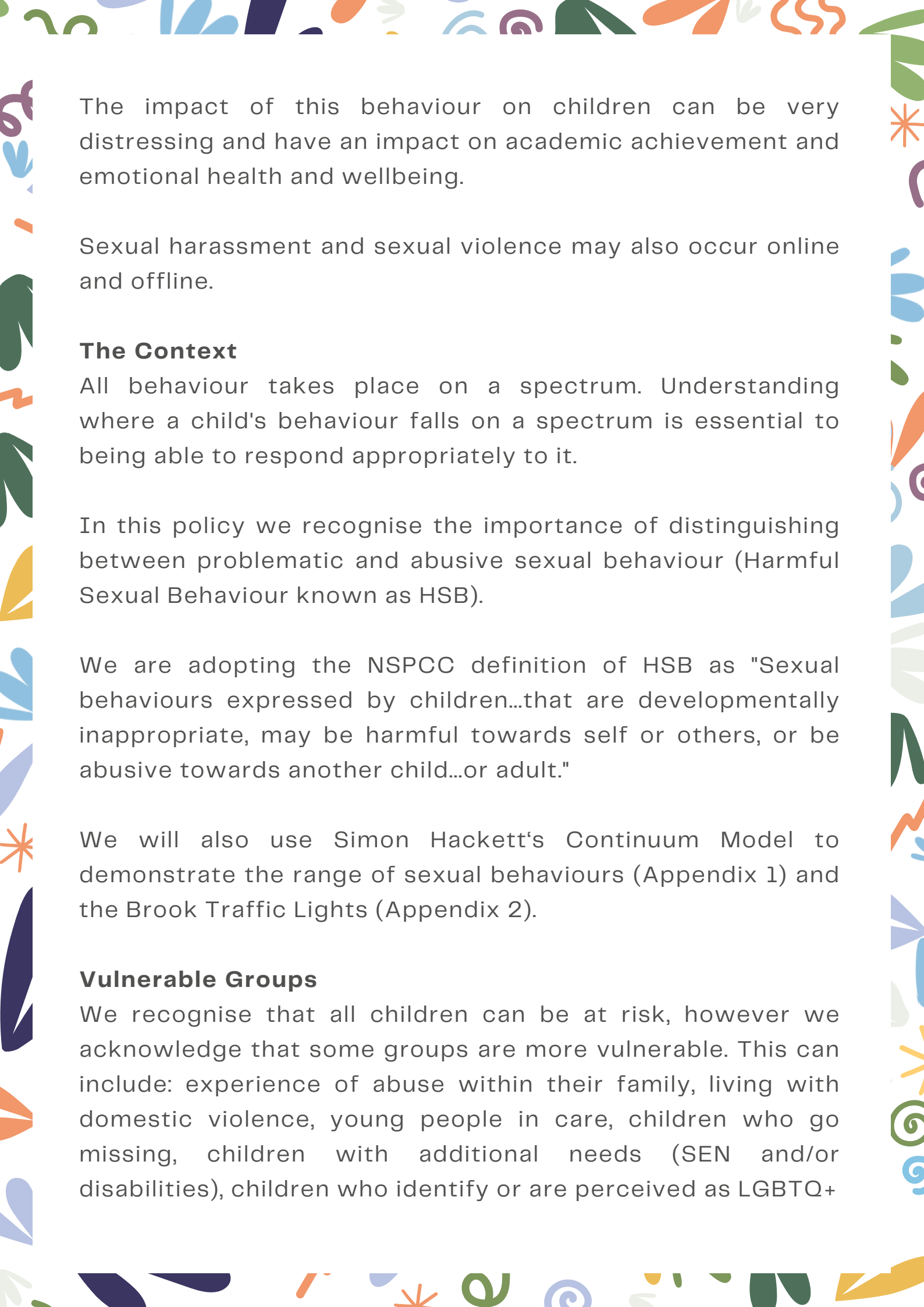
We recognise that peer-on-peer abuse can manifest itself in many ways such as:

- Child Sexual Exploitation,
- Sexting or youth produced digital imagery,
- Up-skirting
- Bullying,
- Radicalisation,
- Abuse in intimate relationships,
- Children who display sexually harmful behaviour,
- Gang association and serious violence (County Lines), and
- Technology can be used for bullying and other abusive behaviour.

Some of these behaviours will need to be handled in partnership with other agencies and with reference to their policies such as the behaviour policy, anti-bullying policy, child protection policy and online safety policy.

Understanding Peer-on-Peer Abuses

Sexual violence and sexual harassment can occur between two children of any age and sex or a group of children sexually assaulting or sexually harassing a single child or group of children.



The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing.

Sexual harassment and sexual violence may also occur online and offline.

The Context

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

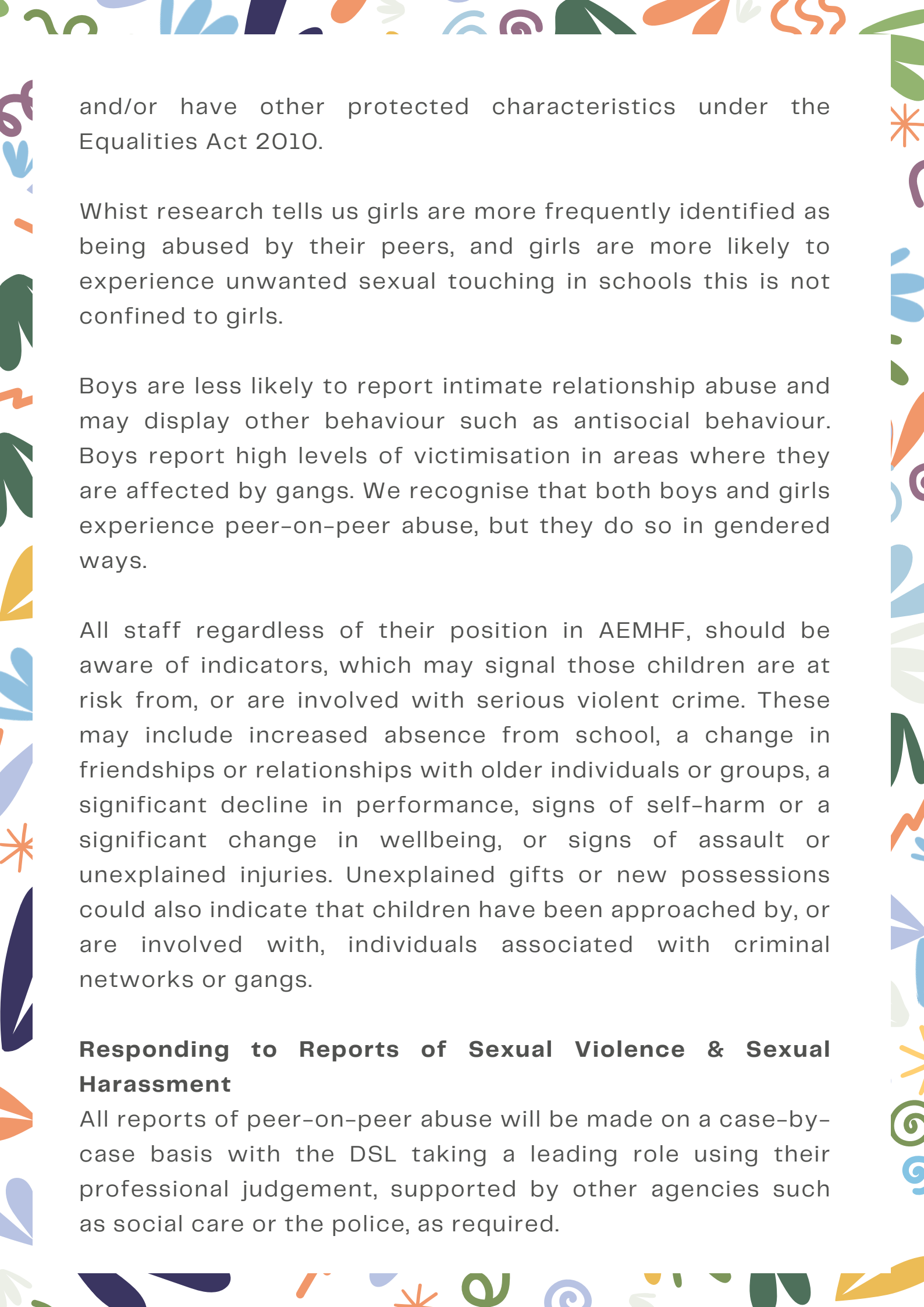
In this policy we recognise the importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour known as HSB).

We are adopting the NSPCC definition of HSB as "Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult."

We will also use Simon Hackett's Continuum Model to demonstrate the range of sexual behaviours (Appendix 1) and the Brook Traffic Lights (Appendix 2).

Vulnerable Groups

We recognise that all children can be at risk, however we acknowledge that some groups are more vulnerable. This can include: experience of abuse within their family, living with domestic violence, young people in care, children who go missing, children with additional needs (SEN and/or disabilities), children who identify or are perceived as LGBTQ+



and/or have other protected characteristics under the Equalities Act 2010.

Whist research tells us girls are more frequently identified as being abused by their peers, and girls are more likely to experience unwanted sexual touching in schools this is not confined to girls.

Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour. Boys report high levels of victimisation in areas where they are affected by gangs. We recognise that both boys and girls experience peer-on-peer abuse, but they do so in gendered ways.

All staff regardless of their position in AEMHF, should be aware of indicators, which may signal those children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Responding to Reports of Sexual Violence & Sexual Harassment

All reports of peer-on-peer abuse will be made on a case-by-case basis with the DSL taking a leading role using their professional judgement, supported by other agencies such as social care or the police, as required.

The Immediate Response to a Report

- AEMHF will take all reports seriously and will reassure the victim that they will be supported and kept safe,
- All staff regardless of their position in AEMHF will be trained to manage a report,
- Any suspicion, allegation or incident of abuse must be reported to our Designated Safeguarding Leads by a member of staff as appropriate.
- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the DSL or social care) staff will however only share the report with those people who are necessary to progress it,
- A written report will be made as soon after the disclosure as possible recording the facts as presented by the child. These may be used as part of a statutory assessment if the case is escalated later,
- Where the report includes an online element AEMHF staff will inform DSL, parents/guardians and any appropriate agency. AEMHF staff will not search, screen and confiscate any devices unless instructed to do so by statutory services like the police. AEMHF staff will not view or forward images unless unavoidable and only if another member of staff (preferably the DSL) is present/asked to do so by statutory services like the police.

This report is completed exclusively on the **Arthur Ellis Mentor Hub** and will be picked up by an on-duty DSL. Our DSL and Deputies are:

- Heather Horner, DSL
- Elle Walker, DSO

They can be contacted on safeguarding@arthurellismhs.com.

Risk Assessment

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

- The victim, especially their protection and support,
- The alleged perpetrator, and
- Actions that are appropriate to protect will be taken for all children and, if appropriate, other adults and staff should they also need protection.

Risk assessments will be recorded using our internal Safeguarding and Welfare Concern form and be kept under review.

The DSL will ensure they are engaging with MASH.

Action Following a Report of Sexual Violence & Sexual Harassment

- Following an incident, we will consider:
- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment,
- The nature of the alleged incident(s), including whether a crime may have been committed and identification of any harmful sexual behaviour,
- The ages of the children involved,
- The developmental stages of the children involved,
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?

- If the alleged incident is a one-off or a sustained pattern of abuse, and
- Are there ongoing risks to the victim, other children, adult students or school or college staff, and other related issues and wider context?

Actions For Children Attending Group Work Intervention

Whilst AEMHF establishes the facts of the case and starts the process of liaising with children's social care and the police:

- The perpetrator will be removed from any classes they share with the victim, and
- We will identify how best to keep the victim and alleged perpetrator a reasonable distance apart on the premises and on transport to and from where the group is being held.

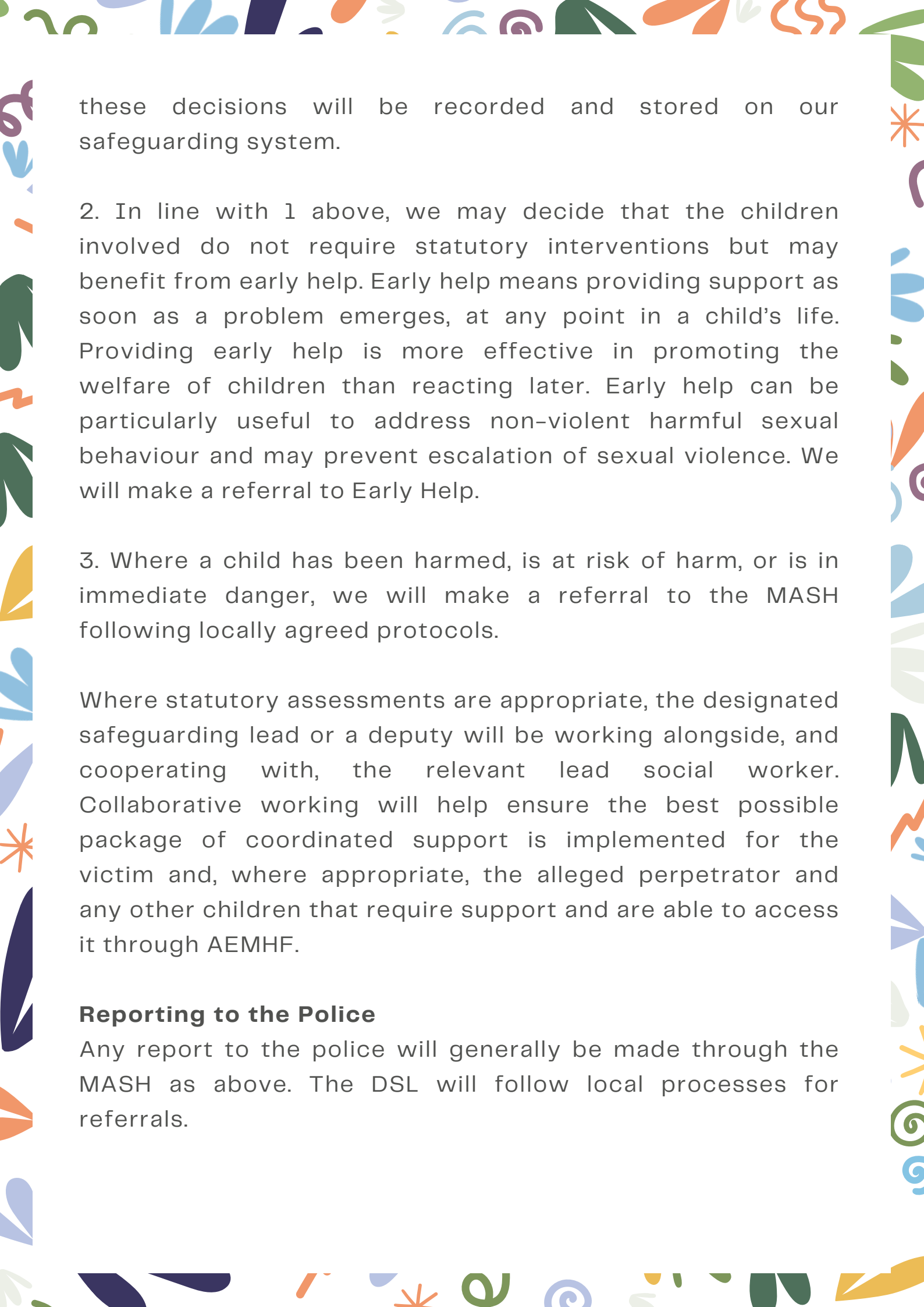
These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

Options to Manage The Report

Manage Internally

1. In some cases of sexual harassment, for example, one-off incidents, we may decide that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, through utilising other policies like child protection, working in partnership with parent/carers and by providing support.

This decision will be made based on the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All decisions, and discussions around making



these decisions will be recorded and stored on our safeguarding system.

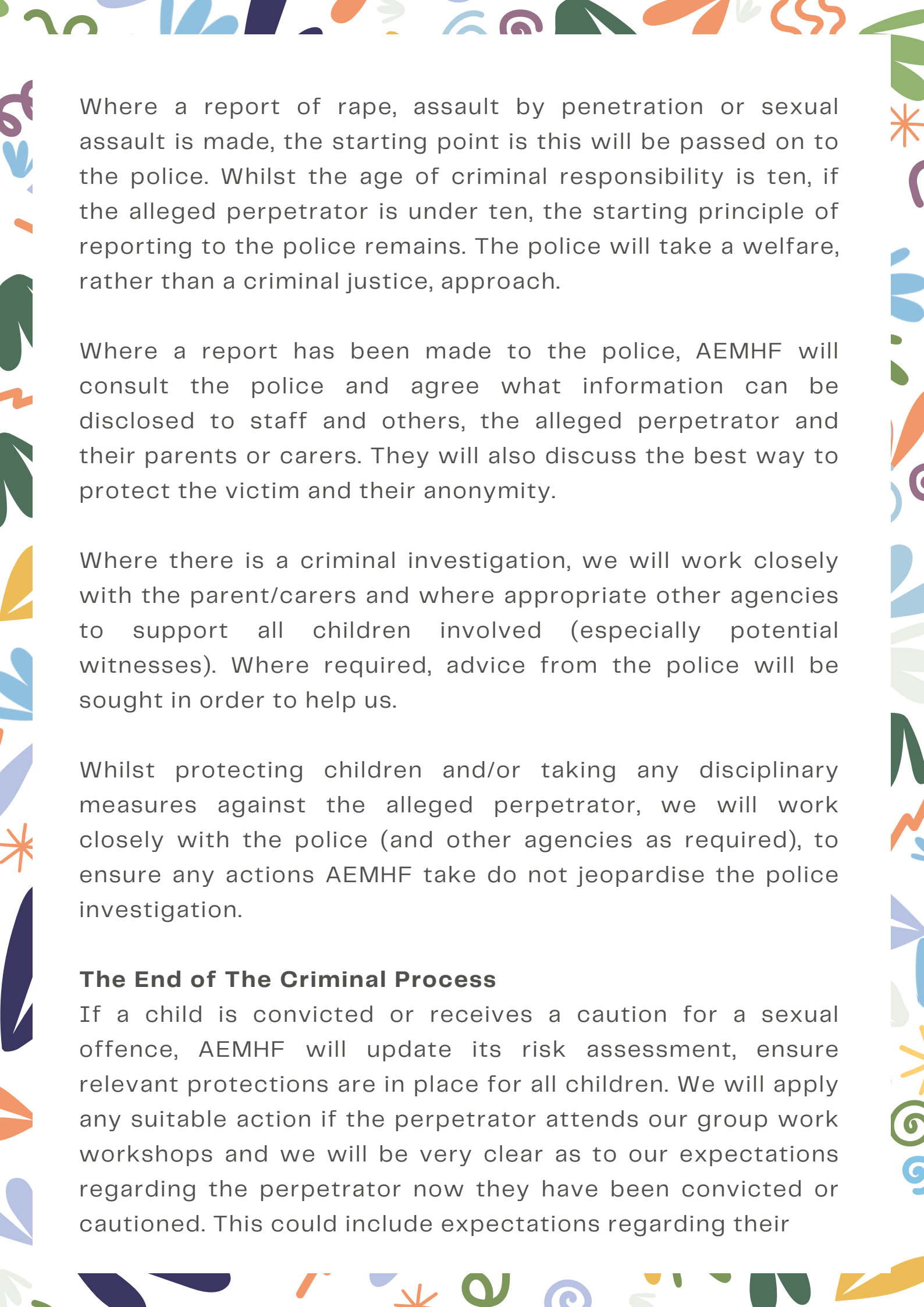
2. In line with 1 above, we may decide that the children involved do not require statutory interventions but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence. We will make a referral to Early Help.

3. Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to the MASH following locally agreed protocols.

Where statutory assessments are appropriate, the designated safeguarding lead or a deputy will be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support and are able to access it through AEMHF.

Reporting to the Police

Any report to the police will generally be made through the MASH as above. The DSL will follow local processes for referrals.



Where a report of rape, assault by penetration or sexual assault is made, the starting point is this will be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

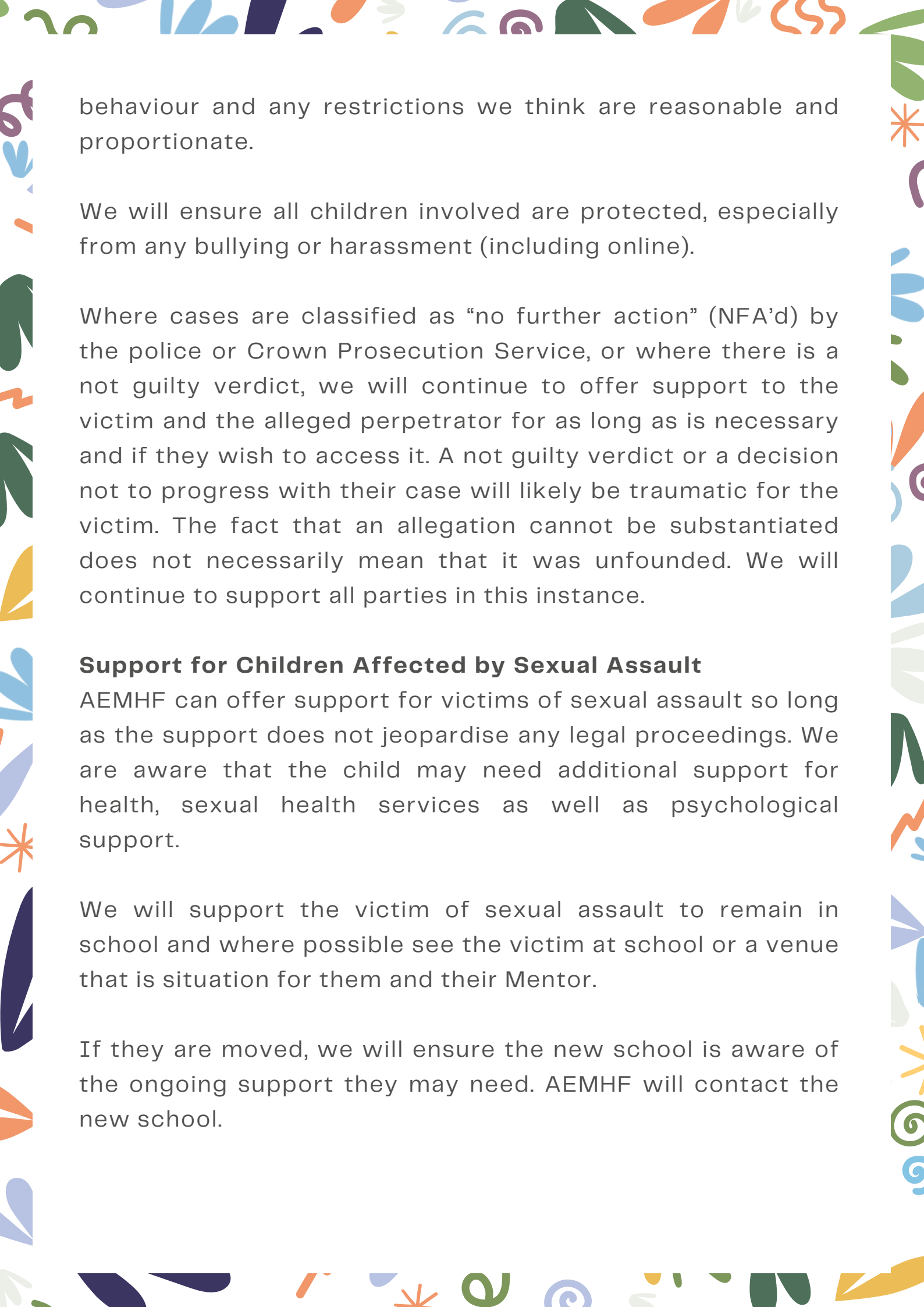
Where a report has been made to the police, AEMHF will consult the police and agree what information can be disclosed to staff and others, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity.

Where there is a criminal investigation, we will work closely with the parent/carers and where appropriate other agencies to support all children involved (especially potential witnesses). Where required, advice from the police will be sought in order to help us.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, we will work closely with the police (and other agencies as required), to ensure any actions AEMHF take do not jeopardise the police investigation.

The End of The Criminal Process

If a child is convicted or receives a caution for a sexual offence, AEMHF will update its risk assessment, ensure relevant protections are in place for all children. We will apply any suitable action if the perpetrator attends our group work workshops and we will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their



behaviour and any restrictions we think are reasonable and proportionate.

We will ensure all children involved are protected, especially from any bullying or harassment (including online).

Where cases are classified as “no further action” (NFA’d) by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary and if they wish to access it. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will continue to support all parties in this instance.

Support for Children Affected by Sexual Assault

AEMHF can offer support for victims of sexual assault so long as the support does not jeopardise any legal proceedings. We are aware that the child may need additional support for health, sexual health services as well as psychological support.

We will support the victim of sexual assault to remain in school and where possible see the victim at school or a venue that is situation for them and their Mentor.

If they are moved, we will ensure the new school is aware of the ongoing support they may need. AEMHF will contact the new school.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, we may take suitable action, if we have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a criminal offence. In case of group work we may not allow the perpetrator to attend further session and alternative support will be offered. The welfare of the victim and potentially serious harm to other children is paramount.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator. Appropriate support will be offered to both as required and decisions around any group work situation and potential contact as required on a case-by-case basis.

All the above will be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review.

Physical Abuse

While a clear focus of peer-on-peer abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from peer to peer can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, AEMHF staff can draw on aspects of Hackett's Continuum Model (Appendix 1) to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- Is socially acceptable,
- Involves a single incident or has occurred over a period,
- Is socially acceptable within the peer group,
- Is problematic and concerning,
- Involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability,
- Involves an element of coercion or pre-planning,
- Involves a power imbalance between the child/children allegedly responsible for the behaviour, or
- Involves a misuse of power.

Online Behaviour

Many forms of peer-on-peer abuse have an element of online behaviour including behaviours such as cyberbullying and sexting.

Policies and procedures concerning this type of behaviour can be found in many school's anti-bullying policy, online safety policy, and child protection policy.

Prevention

AEMHF actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by educating all AEMHF staff regardless of position, volunteers, work experience, visitors, contractors, and agency staff on the nature, prevalence, and effect of peer-on-peer abuse, and how to prevent, identify and respond to it.

This includes:

- Contextual Safeguarding,
- The identification and classification of specific behaviours; and the importance of taking seriously all forms of peer-on-peer abuse (no matter how low level they may appear) and ensuring that no form of peer-on-peer abuse is ever dismissed as horseplay or teasing,
- Educating children about the nature and prevalence of peer-on-peer abuse where appropriately needed in Mentoring sessions,
- Educate children on what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse,
- Engaging parents on this issue by;
 - –Talking about it with parents, both in groups and one-to-one where needed and/or appropriate;
 - –Asking parents what they perceive to be the risks facing their child and how they would like to see the those risks addressed;
 - –Engaging parents to get involved in the review of School policies and lesson plans at their child's school; and
 - –Encouraging parents to hold the School to account on this issue.



Ensuring that all peer-on-peer abuse issues are fed back to the School's safeguarding team also, so that they can spot and address any concerning trends and identify children who maybe in need of additional support,

- Support parents and carers to challenging the attitudes that underlie such abuse (both inside and outside the classroom) with the school if needed,
- AEMHF will creating a culture in which our young clients feel able to share their concerns openly, in a non-judgmental environment, and have them listened to, and
- Responding to cases of peer-on-peer abuse promptly and appropriately.

The DSL takes lead responsibility for child protection and safeguarding. They are available during working and extended (where required) hours to discuss any safeguarding concerns In the absence of the DSL or Deputies, contact MK Together Safeguarding Partnership or in emergency and extreme cases, the police.

When the matter regards children, the nominated safeguarding lead shall telephone and report the matter to the Milton Keynes Multi Agency Safeguarding Hub who can be contacted on 01908 253169 or 01908 253170 during working hours Monday – Friday 9–5pm (excluding bank holidays) or out of hours 01908 265545. Alternatively you can email children@milton-keynes.gov.uk.

Children resident out of county but attending our services will be reported to their home MASH or equivalent Social Care.



In cases involving children who are subject to risk, harm and abuse and who have LAC status, the children's social worker must be informed and a coordinated approach to address any incidents or concerns will be required.

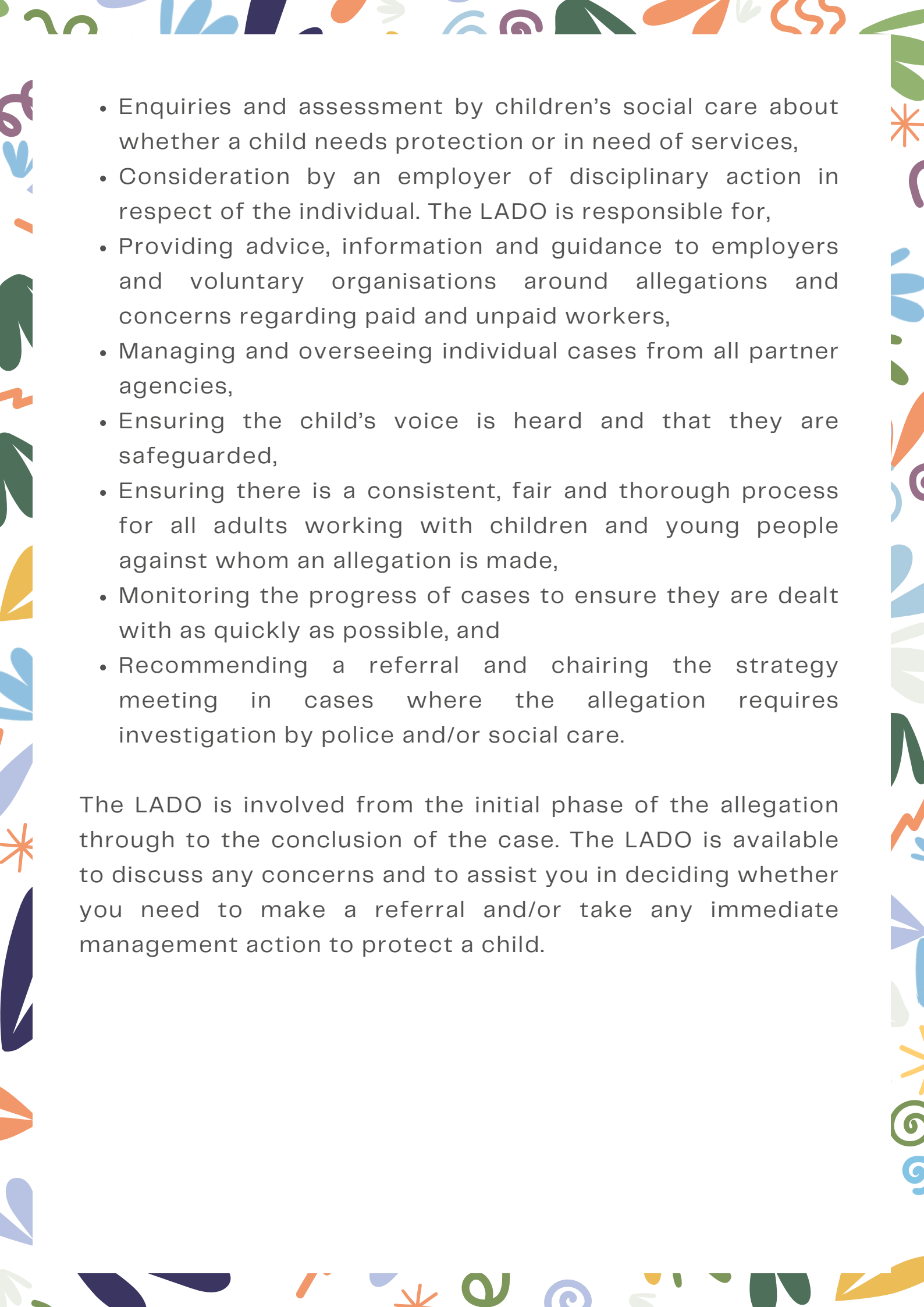
A written record of the date and time of the report shall be made, and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the relevant local authority adult social services department within 24 hours.

The Role of The LADO (Local Authority Designated Officer)

The role of the LADO is set out in Working Together to Safeguard Children (2015) and is governed by the Authorities duties under section 11 of the Children Act 2004 and MKSCB Inter-Agency Policy and Procedures (Ch 2.8). This guidance outlines procedures for managing allegations against people who work with children who are paid, unpaid, volunteers, casual, agency or anyone self-employed.

The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed a child,
- Possibly committed a criminal offence against or related to a child,
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children. There may be up to three strands in the consideration of an allegation,
- A police investigation of a possible criminal offence,

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- Enquiries and assessment by children's social care about whether a child needs protection or in need of services,
 - Consideration by an employer of disciplinary action in respect of the individual. The LADO is responsible for,
 - Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers,
 - Managing and overseeing individual cases from all partner agencies,
 - Ensuring the child's voice is heard and that they are safeguarded,
 - Ensuring there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made,
 - Monitoring the progress of cases to ensure they are dealt with as quickly as possible, and
 - Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO is available to discuss any concerns and to assist you in deciding whether you need to make a referral and/or take any immediate management action to protect a child.

If you wish to discuss any concerns and are unsure if the above criteria have been met, please complete and return a LADO Notification form to lado@Milton-keynes.gov.uk or lado@milton-keynes.gcsx.gov.uk prior to contacting her on 01908 254300. If the above criteria have been met then you should make a referral to the Multi Agency Safeguarding Hub (MASH) by completing the Multi-Agency Referral Form (MARF).

If the LADO is not available, you should refer to Multi Agency Safeguarding Hub on 01908 253169/3170.

Jon Manning, Founder and CEO of AEMHF, will review and approve this policy annually, hold other DSLs to account for the implementation of this policy, will monitor the effectiveness of this policy and will act as a case manager in the event of an allegation of abuse made against the DSL.

REVIEW

Written: January 2025

Adapted: September 2026

For review: September 2027

Updated on Website: September 2026

ARTHUR ELLIS

CHARITY NUMBER 1207350



THE ARTHUR ELLIS
MENTAL HEALTH FOUNDATION