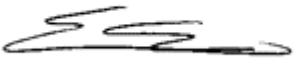




St. Helen's Catholic Primary School

HARMFUL SEXUAL BEHAVIOURS POLICY

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POLICY FOR HARMFUL SEXUAL BEHAVIOURS

MISSION

Our Mission

Respect yourself.

Respect everyone in our school community.

Respect everyone in our local community.

Respect everyone in our global community.

But most of all, respect God our Father in Heaven.

Purpose and Aims

St Helen's Catholic Primary School is committed to providing a safe, respectful and inclusive environment in which every child is valued, protected and able to flourish.

Children are naturally curious about their own bodies, relationships and the world around them. Some sexualised behaviours may form part of normal childhood development. Other behaviours may be inappropriate, problematic, abusive or harmful and may require safeguarding intervention.

This policy aims to:

- establish a consistent, child-centred approach to understanding and responding to sexual behaviour between children;
- distinguish, as far as possible, between developmentally expected behaviour, inappropriate behaviour, problematic behaviour and harmful or abusive sexual behaviour;
- ensure that concerns are recognised, recorded, assessed and responded to promptly;
- safeguard and support any child who has experienced harmful sexual behaviour;
- safeguard and support children who display harmful sexual behaviour, recognising that their behaviour may indicate additional needs, previous experiences of abuse, trauma or exposure to inappropriate material;
- ensure that SEND, developmental age, communication needs and other vulnerabilities are properly considered without minimising the impact of behaviour on another child;
- provide children with age-appropriate education about bodies, privacy, consent, boundaries and seeking help;
- work constructively with parents, carers and external agencies; and
- promote a school culture in which sexual harassment, sexual violence and harmful sexual behaviour are never dismissed as "banter", curiosity or an inevitable part of growing up.

This policy should be read alongside the school's Child Protection and Safeguarding Policy, Rights & Responsibilities Policy, Anti-Bullying Policy, Online Safety Policy, SEND Policy, Relationships and Health Education/RSE Policy and Staff Code of Conduct.

Definition of Harmful Sexual Behaviour

Harmful sexual behaviour (HSB) is an umbrella term used to describe sexual behaviours displayed by children and young people which are developmentally inappropriate, may be harmful towards themselves or others, or may be abusive towards another child.

Sexual behaviour exists on a continuum. Not every sexual behaviour displayed by a child is harmful, and staff should avoid unnecessarily criminalising or stigmatising children for developmentally expected curiosity.

Equally, behaviour must not be dismissed simply because the person displaying it is a child.

The school will consider the nature of the behaviour, the developmental stages of the children involved, the context in which it occurred, issues of consent, power and coercion, frequency, persistence, impact and any wider safeguarding information.

Our Safeguarding Principles

When responding to sexual behaviour between children, St Helen's will work from the following principles:

All children involved are children first.

The language used by adults will therefore be factual, proportionate and non-stigmatising. Terms such as "perpetrator" and "victim" will not routinely be used to define children. Where appropriate, records will refer to the *child who has experienced the behaviour* and the *child who has displayed the behaviour*.

The impact of behaviour matters.

Behaviour does not have to have been intended to cause harm in order to have caused harm.

Consent must be understood developmentally.

An apparent agreement between children does not automatically establish meaningful consent. Staff must consider age, developmental understanding, power imbalance, coercion, pressure, fear and vulnerability.

Context matters, but context does not excuse harm.

SEND, neurodivergence, developmental delay, trauma, communication difficulties or limited understanding may be highly relevant to why behaviour occurred and what support a child requires. They do not remove another child's right to safety.

Children displaying harmful behaviour may also require safeguarding.

HSB can sometimes be associated with previous abuse, exposure to sexual content, domestic abuse, trauma, exploitation, neglect or other adverse experiences. Staff will remain professionally curious about what the behaviour may be communicating.

The absence of a disclosure does not mean the absence of harm.

Staff will consider behaviour, presentation and contextual information alongside what children are able or willing to say.

Understanding Sexual Behaviour: The Hackett Continuum

The school uses the principles of Professor Simon Hackett's continuum of children and young people's sexual behaviour to support professional judgement.

Behaviour may broadly be understood as:

Normal / developmentally expected

Consensual, mutual and reciprocal behaviour between children of a similar developmental age, which reflects developmentally expected curiosity and does not cause distress.

Inappropriate

Behaviour that may be developmentally unusual, socially inappropriate or occur in an inappropriate context. There may be limited understanding of boundaries or consent, but the behaviour may be isolated and responsive to correction and education.

Problematic

Behaviour that is developmentally concerning, repeated, intrusive or preoccupying; may involve significant differences in age or developmental ability; or may cause distress to the child or others.

Abusive

Behaviour involving coercion, intimidation, manipulation, exploitation, significant power imbalance or lack of meaningful consent. The behaviour may cause physical or emotional harm.

Violent

Sexual behaviour involving significant physical force, aggression, threat or violence.

The continuum is not used as a diagnostic instrument. Behaviour may move across categories as additional information becomes available, and assessment must consider the individual circumstances of each child.

Brook Sexual Behaviours Traffic Lights®

Where appropriate, trained staff may use the **Brook Sexual Behaviours Traffic Lights® framework** to support assessment and professional decision-making.

The framework provides age-related guidance and broadly categorises behaviour as:

Green behaviours – developmentally expected sexual behaviours which may provide opportunities for education and reinforcement of appropriate boundaries.

Orange behaviours – behaviours which may be outside expected development and require further exploration, assessment, monitoring and/or intervention.

Red behaviours – behaviours which are concerning or harmful and require immediate safeguarding consideration and appropriate intervention.

The Traffic Lights framework will never be used mechanically or in isolation. A colour category does not replace professional safeguarding judgement, discussion with the DSL or referral to statutory services where required.

The school recognises that Brook requires professionals to undertake appropriate Traffic Lights® training in order to access and use the framework. Staff who have not received this training should report concerns to the DSL rather than independently attempting to categorise behaviour using the tool.

Prevention and Education

Prevention is an essential part of the school's safeguarding approach.

Through Relationships and Health Education/RSE, PSHE, online safety education, assemblies and everyday interactions, children are taught about:

- healthy friendships and relationships;
- appropriate and inappropriate touch;
- privacy and personal boundaries;
- correct names for body parts, where developmentally appropriate;
- bodily autonomy;
- consent and the right to say no;
- respecting another person's "no";
- secrets and surprises;
- recognising uncomfortable or unsafe situations;
- seeking help from trusted adults;
- online safety, including sharing images and exposure to inappropriate material; and
- the importance of telling an adult when something worries or frightens them.

Teaching will be developmentally appropriate and adapted where necessary so that children with SEND and communication difficulties can access and understand key safeguarding messages.

NSPCC Talk PANTS

The school uses the NSPCC **Talk PANTS** approach as an important part of preventative safeguarding education, particularly in EYFS and primary-age provision.

Children are taught the PANTS rules:

P – Privates are private

Children learn that the parts of their body covered by underwear are private.

A – Always remember your body belongs to you

Children are taught about bodily autonomy and that they have a right to feel safe.

N – No means no

Children learn that they have the right to say no to unwanted touch and should also respect another person's boundaries.

T – Talk about secrets that upset you

Children learn the distinction between enjoyable surprises and secrets which make them worried, frightened or uncomfortable.

S – Speak up, someone can help

Children are encouraged to identify trusted adults and understand that they should keep telling until somebody listens and helps.

Talk PANTS will be delivered sensitively and in accordance with NSPCC guidance. Appropriate adapted resources may be used for children with SEND, including visual, accessible and Makaton-supported materials where appropriate.

Talk PANTS is not treated as a one-off lesson. Its principles form part of the school's wider safeguarding culture and language around bodies, boundaries and trusted adults.

Recognising Harmful Sexual Behaviour

Staff should report any sexual behaviour which causes concern.

Particular attention should be given to behaviour which:

- is significantly outside that expected for the child's developmental stage;
- is repeated or escalating;
- continues despite adult intervention;
- involves coercion, force, bribery, manipulation, threats or secrecy;
- involves a significant difference in age, size, developmental ability, social status or power;
- causes another child fear, distress, embarrassment, pain or discomfort;
- involves penetration or attempted penetration;
- involves sexualised threats or aggression;
- appears compulsive or preoccupying;
- involves explicit sexual knowledge or behaviour unexpected for the child's developmental stage;
- involves the creation, possession, sharing or requesting of sexual imagery;
- involves online sexual harassment or coercion;
- targets younger or particularly vulnerable children;
- occurs alongside other concerning behaviour or safeguarding indicators; or
- suggests that a child may have experienced abuse, exploitation or inappropriate sexual material.

This list is not exhaustive.

Responding to an Incident

Any member of staff who witnesses, receives a report of, or becomes concerned about sexual behaviour between children must respond calmly and professionally.

The immediate priorities are to:

1. ensure the immediate physical and emotional safety of all children;
2. separate children where necessary without creating unnecessary shame or public attention;
3. listen to children without conducting an investigation;
4. avoid asking leading or suggestive questions;
5. reassure a child who makes a disclosure that they have done the right thing by telling;
6. avoid promising confidentiality;
7. make a clear, factual and contemporaneous safeguarding record;
8. report the concern to the DSL or deputy DSL as soon as possible; and
9. preserve any relevant evidence, particularly where digital devices, messages or imagery may be involved.

**Staff must not require children to participate in any type of restorative work
before the safeguarding implications have been assessed.**

DSL Assessment and Decision-Making

The DSL will undertake an initial safeguarding assessment, considering:

- exactly what is reported to have happened;
- the age and developmental stage of each child;
- SEND, communication and cognitive needs;
- the relationship between the children;
- whether the behaviour appears consensual, reciprocal or coercive;
- differences in power, age, size, status or vulnerability;
- whether the behaviour was spontaneous, planned or persistent;
- frequency and previous incidents;
- whether the behaviour has escalated;
- the physical and emotional impact;
- the location and context;
- whether technology or sexual imagery was involved;
- whether either child has experienced previous abuse, trauma or exploitation;
- other safeguarding concerns relating to either child;
- the wishes and feelings of the child who experienced the behaviour; and
- whether there is an ongoing risk to either child or to other children.

The Hackett continuum and, where appropriately trained staff are available, the Brook Traffic Lights® framework may support this assessment.

The DSL will determine whether the response requires:

- education and monitoring within school;
- an individual safety or support plan;
- Early Help;
- consultation with children's social care;
- a referral to children's social care;
- consultation with or referral to the police;
- specialist HSB assessment or intervention; and/or
- other health, SEND or therapeutic support.

Where there is uncertainty, the DSL will seek safeguarding advice from the Assisi Catholic Trust and/or Southend Safeguarding rather than downgrade the concern.

Supporting the Child Who Has Experienced Harmful Sexual Behaviour

The school will take seriously the wishes, feelings and experience of the child who has experienced the behaviour.

Support may include:

- identifying a trusted adult;
- regular pastoral check-ins;
- adjustments to classrooms, playgrounds, clubs or routines;
- arrangements to prevent unnecessary contact with the other child;
- access to pastoral or specialist support;
- support with attendance or anxiety;
- liaison with parents/carers and external agencies; and
- an individual safety plan where required.

A child should not ordinarily be expected to substantially change their education or activities because of another child's behaviour. Any necessary arrangements will seek to minimise disruption and avoid placing the burden of managing risk upon the child who has experienced harm.

Supporting the Child Who Has Displayed Harmful Sexual Behaviour

The school recognises that children need to understand that actions have consequences. Where a child has displayed harmful sexual behaviour, any consequence will be proportionate, developmentally appropriate and, wherever possible, educational in purpose. It will form part of a wider safeguarding response designed to help the child understand the impact of their actions, develop safer choices and learn about appropriate boundaries, consent and relationships. The child will be held appropriately accountable for their behaviour while being supported to understand boundaries, consent, relationships and the impact of their actions.

The child will be held appropriately accountable for their actions while being supported to understand boundaries, consent, relationships and the impact of their choices.

Support may include:

- increased supervision;
- explicit teaching about privacy, consent and boundaries;
- targeted pastoral intervention;
- SEND assessment or reasonable adjustments;
- work with parents/carers;
- Early Help;
- therapeutic or specialist HSB intervention;
- social care involvement; and
- an individual risk management or safety plan.

The school will avoid language which labels the child as inherently dangerous, predatory or "bad".

Consequences under the Rights & Responsibilities and Impact & Consequences Policies may be appropriate but will form only one part of the response. Safeguarding assessment and intervention must not be replaced by disciplinary action.

SEND and Additional Vulnerability

Children with SEND may experience additional vulnerabilities relating to harmful sexual behaviour.

Some children may:

- have difficulty understanding social rules or boundaries;
- interpret language literally;
- have delayed social or emotional development;
- have limited understanding of consent;
- find it difficult to communicate what has happened;
- display sensory-seeking behaviour;
- have greater dependence on adults for intimate care;
- be more vulnerable to grooming or exploitation; or
- have difficulty recognising abusive behaviour.

Staff must distinguish carefully between explanation and excuse.

A child's SEND may explain why particular teaching, supervision or intervention is necessary. It does not mean that another child should be expected to tolerate behaviour which makes them unsafe.

Assessment and intervention should therefore be individualised and accessible to both the child displaying the behaviour and any child affected by it.

Online Harmful Sexual Behaviour

HSB may occur wholly or partly online.

This may include:

- sexualised messages or comments;
- requests for sexual images;
- sharing sexual images;
- coercion or pressure to produce images;
- exposing another child to pornography;
- sexualised bullying;
- manipulated or AI-generated sexual imagery;
- unwanted sexual content;
- sexualised communication through games or social media; and
- recording or distributing sexual behaviour.

Online incidents will be treated with the same safeguarding seriousness as face-to-face incidents.

Staff must not unnecessarily view, copy, print, forward or share sexual imagery involving children. Such concerns must be referred immediately to the DSL and managed in accordance with current safeguarding guidance.

Parents and Carers

Parents and carers are important partners in safeguarding children.

Where appropriate, the school will communicate openly with the parents/carers of children involved in an incident and explain:

- the nature of the concern;
- the school's safeguarding response;
- immediate safety arrangements;
- support available;
- any referrals or external agency involvement; and
- expectations regarding confidentiality and the privacy of other children.

There may be circumstances in which parents are not informed immediately, particularly where doing so could place a child at increased risk or prejudice a safeguarding or criminal investigation. Such decisions will be made in consultation with appropriate safeguarding agencies.

Information about another child or family will not be shared simply because parents request it.

Confidentiality

Information relating to HSB is sensitive safeguarding information and will be shared only with those who need it in order to protect and support children.

Staff must not discuss incidents informally with colleagues, other parents or members of the wider school community.

Children involved should also be supported to maintain appropriate privacy without being made responsible for keeping safeguarding concerns secret.

Recording

All concerns, disclosures, incidents, assessments and actions relating to HSB will be recorded on the school's safeguarding recording system, CPOMS.

Records should:

- use factual, neutral and child-centred language;
- distinguish between what was observed, what was reported and professional judgement;
- record the child's own words where relevant;
- record decisions and the rationale for them;
- identify consultation with external agencies;
- record safety planning and review arrangements; and
- avoid unnecessary or stigmatising descriptions.

Separate safeguarding records should be maintained for each child involved, with appropriate cross-referencing where necessary.

Risk and Safety Planning

Where HSB presents an ongoing or potential risk, the DSL will coordinate an individual safety or risk management plan.

This may consider:

- supervision;
- movement around school;
- toilets and changing areas;
- seating and classroom arrangements;
- break and lunchtime arrangements;
- clubs and wraparound provision;
- educational visits;
- transport;
- use of technology;
- identified trusted adults;
- known triggers or vulnerabilities;
- actions if concerns reoccur; and
- frequency of review.

Plans should be proportionate and reviewed regularly.

Risk management must not become indefinite exclusion from ordinary school life. The aim should be to enable children to participate safely and successfully while risks are actively reduced.

Staff Training

All staff will receive appropriate safeguarding training so that they:

- understand that sexual behaviour exists on a developmental continuum;
- recognise potentially problematic and harmful sexual behaviour;
- understand the importance of consent, coercion and power imbalance;

- know how to respond to a disclosure;
- understand the additional vulnerabilities of children with SEND;
- know how to record and report concerns;
- understand the school's preventative approach, including Talk PANTS; and
- know when concerns must be referred to the DSL.

Staff expected to formally use the Brook Sexual Behaviours Traffic Lights® framework should undertake appropriate Brook training.

DSLs should maintain up-to-date knowledge of HSB assessment and intervention, including the Hackett continuum and relevant local safeguarding procedures.

Language and School Culture

The language adults use shapes how children understand themselves and others.

Staff will therefore avoid:

- minimising sexual behaviour as “banter”, “flirting” or “just curiosity” without assessment;
- describing children using adult sexual terminology;
- publicly shaming children;
- making assumptions about intent;
- blaming children who have experienced harmful behaviour;
- suggesting that a child invited or encouraged the behaviour because of clothing, friendship or previous interactions; or
- permanently defining a child by behaviour they have displayed.

Our approach is one of **safeguarding, accountability, education and hope**.

We recognise the harm that sexual behaviour can cause while also recognising the capacity of children to learn, develop and change.

Monitoring Patterns

The DSL will monitor HSB concerns not only as individual incidents but also for patterns.

This may include patterns relating to:

- particular children;
- locations;
- times of day;
- year groups;
- online platforms;
- peer groups;
- children with additional vulnerabilities; and
- repeated low-level sexualised behaviours.

Apparently isolated or lower-level incidents may become significant when viewed cumulatively.

Relevant themes will inform safeguarding training, supervision, curriculum planning and school improvement while maintaining appropriate confidentiality.

External Agencies

Depending upon the nature and seriousness of the concern, the school may work with:

- Children's Social Care;
- Early Help;
- the police;
- health services;
- educational psychology;
- specialist SEND services;
- specialist harmful sexual behaviour services;
- CAMHS or therapeutic services; and
- other safeguarding partners.

Referral to another agency does not remove the school's responsibility to continue safeguarding and supporting children.

Key Guidance and Resources

This policy is informed by:

- Department for Education – Keeping Children Safe in Education 2026
- NSPCC – Harmful Sexual Behaviour guidance and resources
- NSPCC – Talk PANTS / The Underwear Rule
- Brook – Sexual Behaviours Traffic Lights®
- Hackett, S. – continuum model of sexual behaviours in children and young people
- NICE Guideline NG55 – Harmful sexual behaviour among children and young people
- current local safeguarding partnership procedures
- the school's Child Protection and Safeguarding Policy.

Monitoring & Review

This policy will be reviewed annually, or sooner where there are changes to statutory guidance, local safeguarding procedures or learning arising from incidents within the school.

The Local Governing Committee will seek assurance that the school has appropriate systems to prevent, identify, assess and respond to harmful sexual behaviour and that staff understand their responsibilities.

At St Helen's, safeguarding children from harmful sexual behaviour means holding two truths together: harm must never be minimised, and no child should be reduced to the most concerning behaviour they have displayed. Our responsibility is to protect, understand, educate and intervene so that every child can be safe, belong and flourish.