

Risk Assessment for Children who Exhibit Sexually Inappropriate/ Harmful Behaviours

For use by Primary Schools

Education Safeguarding Team

September 2022

Keeping Children Safe in Education 2022 states that sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of ‘it could happen here’

What is Sexually Inappropriate/Harmful Behaviour?

Harmful sexual behaviours can be defined as: ‘sexual behaviour expressed by children and young people under the age of 18 years old that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child, young person or adult’.

(Hackett; 2014; Children and Young People with Harmful Sexual Behaviours)

The definition of **Sexual Abuse** in Working Together to Safeguard Children is also relevant as it recognises that abuse can be perpetrated by children as well as adults.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

(Working Together to Safeguard Children, July 2018)

Inappropriate and harmful sexual behaviours can include a whole spectrum of behaviours, including but not limited to: “using sexually explicit words and phrases, inappropriate touching, using sexual violence or threats, full penetrative sex with other children or adults”

(examples taken from NSPCC definition).

Children’s sexual behaviour exists on a wide continuum **from normal and developmentally expected to inappropriate, problematic, abusive and violent**. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage... Harmful sexual behaviour can occur online and/or face to face and can also occur simultaneously between the two.

(Part Five: Keeping Children Safe in Education, September 2022)

For further clarity on what is meant by this terminology “**from normal and developmentally expected to inappropriate, problematic, abusive and violent,**” Designated Safeguarding Leads (or Deputies) can refer to Hackett’s ‘Continuum of children and young people’s sexual behaviours’.

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

A continuum of children and young people’s sexual behaviours (Hackett, 2010)

The [Child Sexual Abuse Assessment Tool](#) (Cambridgeshire and Peterborough Safeguarding Children Partnership Board) is a useful resource for professionals to use to identify inappropriate and harmful behaviours across the age ranges. It distinguishes sexual behaviours which are part of healthy development through to sexual behaviours that are inappropriate, problematic or concerning and finally those behaviours which are abusive and violent.

It is particularly important to consider the age and developmental stage of the child when considering inappropriate/harmful sexual behaviours.

Sexual behaviours between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child particularly if they have power over them, for example if the older child is disabled or smaller in stature.

(‘Part Five: Keeping Children Safe in Education,’ September 2022)

It is important that all school staff receive training so that they recognise that safeguarding issues can manifest themselves as child-on-child abuse. Staff need to be aware that harmful sexual behaviour should be considered in a child protection context as a child or young person displaying inappropriate or harmful sexual behaviour may have their own unmet needs and may also pose a risk of harm to others. Staff need to know that such concerns must be referred to Designated Safeguarding Leads (or Deputies) in accordance with the school safeguarding policy. It is also important that staff have received training so that they are equipped to respond to a report of from a child or young person of inappropriate, problematic, abusive or violent sexual behaviour.

Concerns about a child or young person's inappropriate or harmful sexual behaviour should be dealt with by the Designated Safeguarding Lead (or Deputy). The completion of this risk assessment may form part of that response.

The important of High-Quality Relationships Education

It is important that appropriate personal safety lessons are taught to ensure that pupils know:

- what sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)?
- about the concept of privacy and the implications of it for both children and adults; including that it is not always right to keep secrets if they relate to being safe.
- that each person's body belongs to them, and the differences between appropriate and inappropriate or unsafe physical, and other, contact.

N.B. This is not a complete list of required content but are those aspects of Relationships Education most pertinent to this risk assessment document.

It is also vital that you seek the opinions of all pupils, via school assembly, classroom activities or your school/class councils about their perceptions of how safe they feel on the school premises. Supporting activities can be found in Personal Safety units of work available from Cambridgeshire PSHE Service as part of their Primary Personal Development Programme.

A note on use of terminology

Whilst this risk assessment document makes use of the terms victim and alleged perpetrator as they are widely understood it is important schools think carefully about the terminology used, especially when speaking in front of children.

“It is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.”

(Keeping Children Safe in Education, September 2022)

The Purpose of the Risk Assessment

This Risk Assessment has been designed to help you to record incidents or concerns around children and young people who exhibit sexually inappropriate or harmful behaviours. It will enable you to consider different aspects of the school environment and school routines in order to identify areas of concerns and formulate action plans. The action plan should outline the steps that need to be taken to ensure the safety of the victim(s), perpetrator(s) and student/staff body more widely. The risk assessment must be recorded (either written or electronic) and remain a live document which is kept under constant review.

This guidance and risk assessment assumes that the school has an up-to-date Safeguarding and Child Protection Policy and Procedures as well as any other linked policies and guidance e.g. the use of physical intervention to manage behaviour; anti-bullying; behaviour, discipline and suspension; transport; educational trips/visits; first aid, intimate care, internet safety and acceptable use of the internet.

How this Risk Assessment fits in with Statutory Guidance

The publication of Part 5 of Keeping Children Safe in Education: Child on Child Sexual Violence and Harassment, (September 2022), incorporates the previously separate guidance document 'Sexual violence and sexual harassment between children in schools and colleges', September 2021. Part 5 of Keeping Children Safe in Education is essential reading prior to undertaking this risk assessment. This statutory guidance outlines the expectations placed upon schools in their response to child-on-child abuse, of which sexually inappropriate/harmful behaviours forms a part. It is made clear that if schools fail to challenge inappropriate behaviours they can normalise such behaviours and create a culture and environment where sexual violence can occur. Emphasis is also placed on schools ensuring that no victim is made to feel ashamed for making a report.

Governing bodies and proprietors should ensure that their child protection policy includes:

- procedures to minimise the risk of child-on-child abuse
- how allegations of child-on-child abuse will be recorded, investigated and dealt with
- clear processes as to how victims, perpetrators and any other children affected by child-on-child abuse will be supported.

(Keeping Children Safe in Education, September 2022)

The use of this risk assessment can form part of the processes by which victims, perpetrators and others affected by child-on-child abuse will be supported.

When should this risk assessment be used?

Keeping Children Safe in Education states that "Where there is a report of **sexual violence** the designated safeguarding lead (or deputy) should make an immediate risk and needs assessment". Sexual violence includes rape, assault by penetration, sexual assault (sexual touching) and causing someone to engage in sexual activity without consent.

Furthermore Keeping Children Safe in Education states that "where there has been a report of **sexual harassment**, the need for a risk assessment should be considered on a case-by-case basis." Sexual harassment is defined as unwanted conduct of a sexual nature (including online sexual harassment), which includes but is not limited to sexual comments, sexual jokes or taunting, physical behaviour such as interfering with someone's clothes, non-consensual sharing of nude or semi-nude images or videos, sexualised bullying on or offline, sexual exploitation coercion or threats.

The risk and needs assessment should consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s); and
- all the other children (and if appropriate adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms
- the time and location of the incident, and any action required to make the location safer.

(Keeping Children Safe in Education, September 2022)

The risk assessment can also be used on other occasions when children or young people have exhibited sexually inappropriate or harmful behaviours and it would be useful give consideration to the school environment and school routines in order to identify areas of concerns and action plan accordingly.

Statutory guidance makes it very clear that risk assessments must be undertaken immediately:

Schools and colleges should not wait for the outcome (or even the start) of a children's social care investigation...consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all the children at the school or college should be **immediate**.

(Keeping Children Safe in Education, September 2022)

How to use the Risk Assessment

The Designated Safeguarding Lead (or Deputy) who has been made aware of the sexually inappropriate/harmful behaviour should always discuss these concerns with any other Designated Safeguarding Leads (or Deputies) and ensure that this conversation is recorded in the safeguarding file/record.

At this point, a decision should be made about whether the behaviour is sexually inappropriate, sexually harmful, sexually abusive or sexually violent. The [Child Sexual Abuse Assessment Tool](#) (Cambridgeshire and Peterborough Safeguarding Children Partnership Board) can be used to support the decision-making process and to identify exactly what it is about the behaviour which is causing concern. This should be sent alongside the referral form should a referral to Children's Social Care subsequently be made.

If behaviour is sexually inappropriate, it may be appropriate to involve Early Help, Children's Social Care and/or the Sexual Behaviour Service. If it is decided that the behaviour is sexually harmful, sexually abusive or sexually violent, advice and support should be requested from other agencies. These could include Children's Social Care, Sexual Behaviour Service and the Police. If a child has been harmed or is at risk of significant harm a referral will need to be made to Children's Social Care in accordance with the safeguarding and child protection policy and procedures. This includes when there is a risk of a child or young person abusing someone else. Depending on the nature of the concerns, a report to the police may also be necessary in parallel with the referral to Children's Social Care.

In order to complete the Risk Assessment, you will need to involve all staff who work with the individual pupil(s) concerned. On completion of the Risk Assessment, you may need to make other staff not directly involved, aware of specific actions, e.g. informing teaching assistants, lunchtime supervisors and out of school club leader etc. Regardless as to whether the incident is being managed in school or requires the support of other agencies, parents should always be involved, unless you have concerns that this behaviour could be the result of the child or young person being sexually abused within the family. Consideration of what is causing inappropriate or harmful problematic sexual behaviour is vital. As stated in Working Together to Safeguard Children; "Children who may be alleged perpetrators should also be assessed to understand the impact of contextual issues on their safety and welfare." The University of Bedfordshire's resources to support schools and colleges to address harmful sexual behaviour, although aimed primarily at secondary colleagues, are particularly strong on addressing these contextual issues. Their resources can be accessed free of charge after signing up to their website here: <https://www.contextualsafeguarding.org.uk/>. The 'Beyond Referrals' resources for schools and accompanying webinars are particularly relevant for school staff.

It is good practice where possible to involve the child(ren) in aspects of these discussions, and the wishes and feelings of the victim must be taken into consideration as much as is reasonably possible. Certainly, you will need to speak with all child(ren) involved. The child(ren) displaying sexually inappropriate/harmful behaviour will need to be made aware that the behaviour(s) are not appropriate in school. It is important to have a full and honest discussion with the alleged perpetrator and continue to talk and work with them. It is important to convey to the alleged perpetrator that whilst the behaviour is not acceptable, you are not condemning them as a person. Denial and embarrassment from the child or young person should be expected.

Multi-Agency Working

Work with children and young people who display sexually harmful behaviour requires a coordinated and multi-agency response. It is essential that all agencies work closely together to enhance communication and ensure consistency of approach. No single agency can manage children and young people with sexually harmful behaviour. Children's Social Care, Health, Education and Criminal Justice Agencies must collaborate in order to assess risk, provide tailored interventions, reduce harm and protect victims. If other agencies are involved then their specialist input should contribute to the risk assessment.

"Where there has been a report of sexual violence it is likely that professional risk assessment by social workers and/or sexual violence specialist will be required... Any such professional assessment should be used to inform the school or colleges approach to supporting and protecting their pupils and students and updating their own risk assessment."

(Keeping Children Safe in Education, September 2022)

Please ensure that:

- Relevant policies and procedures support this process. It may be necessary to amend some of your policies if the identified risk is not already acknowledged in your policy, e.g. Online Safety and Acceptable Use of the Internet Policy;
- You complete the risk assessment having followed the guidance in this document;
- Relevant agencies and parents are informed so that this process is transparent and support is consistent;
- Following an incident, you complete a risk assessment for each pupil involved, including the victim(s), perpetrator(s) and other pupils directly affected;
- A review date is set at the time of completing the risk assessment;
- If similar behaviours are exhibited at a later date, the risk assessment should be reviewed and updated;
- All relevant staff are informed of decisions and changes to be made as a result of this risk assessment;
- You constantly review your decisions until the behaviours or concerns have been reduced to an acceptable level;
- If the incident involves the use of mobile technology and/or use of the internet, advice can be sought from the Useful Contacts section.

Useful Reference Documents

You may find some of the following documents useful when completing this Risk Assessment:

The [Child Sexual Abuse Assessment Tool](#) (Cambridgeshire and Peterborough Safeguarding Children Partnership Board)

Guidance for Professionals Working with Sexually Active Young People Under the Age of 18 which is Chapter 2.45 of the Safeguarding Children Partnership Board Manual which can be found at <http://www.safeguardingcambspeterborough.org.uk/children-board/professionals/procedures/sexuallyactiveyp>

Harmful Sexual Behaviour Resources from University of Bedfordshire
<https://www.contextualsafeguarding.org.uk/>

[Keeping Children Safe in Education: Statutory Guidance for schools and colleges](#), September 2022

Personal Safety units of work available from [Cambridgeshire PSHE Service](#) as part of their Primary Personal Development Programme.

[Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#), effective September 2020

[Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children](#), July 2018

Depending on the risk identified, advice should be sought from one or more of the following agencies:

Cambridgeshire Sexual Behaviour Service Tel: 01223 703591
Email: Trudy.potter@cambridgeshire.gov.uk

Peterborough Harmful Sexual Behaviour Service Email: rian.perry@peterborough.gov.uk
Tel: 07901 517947

Children's Social Care Referrals
Cambridgeshire Tel: 0345 045 5203
Peterborough Tel: 01733 864180
Make a [professional referral online](#)

Out of hours Tel: 01733 234724

Early Help Hub Tel: 01480 376 666
Email: early.help@cambridgeshire.gov.uk

Multi Agency Safeguarding Hub (MASH) Tel: 01480 847743
Police Child Abuse Investigation Unit

UK Safer Internet Centre Tel: 0344 3814772
Email: helpline@saferinternet.org.uk

Other useful Points of Reference:

Cambridgeshire and Peterborough Safeguarding Partnership Board – [Safeguarding Children Partnership Board | Cambridgeshire and Peterborough Safeguarding Partnership Board \(safeguardingcambspeterborough.org.uk\)](#)

Child Exploitation and Online Protection Centre - <https://www.ceop.gov.uk/>

Childnet International – Internet Safety Website – <https://www.childnet.com/>

Internet Watch Foundation - [Internet Watch Foundation IWF - Eliminating Child Sexual Abuse Online | IWF](#)

Kidscape – www.kidscape.org.uk

NSPCC – [NSPCC | The UK children's charity | NSPCC](#)

For children and young people [Childline | Childline](#)

Stop it Now! – Child Sexual Abuse - [Stop It Now! UK and Ireland | Preventing child sexual abuse](#)

Think U Know – [CEOP Education \(thinkuknow.co.uk\)](http://CEOP Education (thinkuknow.co.uk))

UKCIS - [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#)

Young Minds - [YoungMinds | Mental Health Charity For Children And Young People | YoungMinds](#)

Risk Assessment for Children who Exhibit Sexually Inappropriate/ Harmful Behaviours

**Eastfield Infant and Nursery
School**

September 2022

What incident, information, disclosure or allegation triggered this risk assessment?

If more than one child was involved in the incident, a risk assessment should be undertaken for each child including both the victim(s) and the perpetrator(s).

Pupil Name:	DOB:	Male / Female:
Current Attendance %:	EHA/CIN/CP/PSP:	
Lead Professional: (if other involved services)	Other pupils involved:	

Describe the identified risk **as factually as possible**. Bullet points often make this process clearer. State who was involved, where it happened, who observed, exactly what happened etc. Remember to also describe clearly any behavioural or physical signs you have observed and avoid leading questions. Outline if the alleged incident is a one off or a sustained pattern of behaviour.

[Expand the text boxes as required to fully capture relevant information].

Are there additional safeguarding concerns for this child?

Does this incident constitute a report of rape, assault by penetration or sexual assault?

Yes/No

Has a crime been committed?

Yes/No

If yes to either of the above then this information should 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.

If yes, when, how and by whom was information shared with police?

--

Has the child to whom this risk assessment relates been harmed or are they at risk of harm?

Yes/No

If yes then this needs to be referred to Children's Social Care.

If yes, when, how and by whom was this referral made?

--

Risk categories to consider

Please note that this risk assessment is designed as a template and should be adapted to reflect the needs of the individual school as required. Please include relevant additional questions as required for your school.

Future proximity of the victim(s) and perpetrator(s): Areas of school

It may be necessary to duplicate areas of this risk assessment in order to adequately consider the various areas of the school site accessed by the child to whom the risk assessment pertains. For example, if the child is taught in different classrooms/group rooms throughout the week, consideration should be given to each teaching space, therefore duplication of this section A may be necessary. The child may access different toilet facilities and arrangements for accessing toilets may vary at different times of day (e.g. during lessons, during break/lunchtimes, during clubs) so duplication of section B may be advisable.

		YES	NO	RISK IDENTIFIED? If so transfer to Risk Management Action Plan
A. Classrooms				
1	Do the victim(s) and alleged perpetrator(s) share a classroom?			
2	Are you able to be flexible regarding the seating plan and layout of the classroom?			
3	Are there any blind spots within the classroom which could create a risk?			
4	Have you maintained areas where children can still be creative but continue to be observed?			
5	Are there procedures in place for children leaving the classroom?			
6	Are there periods during the day during which children may be unsupervised in the classroom?			
B. Toilets				
1	Whilst visiting the toilet, are pupils out of sight of staff?			
2	Can you manage the use of the toilets so that only one child uses them at a time?			
3	Are staff allocated to monitor toilets in a discrete and unobtrusive manner?			
4	Are the toilets unisex?			
5	Are the toilets used by children of different ages?			
6	Does the location of the toilets cause a problem?			
C. Hallways and Corridors				
1	Are children supervised or able to be seen at all times (e.g. through windows)?			
2	Are there any cupboards or empty rooms which could be accessible to children?			
3	When moving from one area to another, are children supervised at all times?			
D. Outdoor Spaces				
1	Are children able to be seen at all times from all areas of the playground?			
2	Do staffing levels afford adequate supervision of all areas?			
3	Is there a need to make certain areas 'out of bounds' temporarily or permanently?			
4	Do you need to involve more staff/older pupils to lead children in constructive play?			
E. Changing for PE / swimming (this applies to in-school and external facilities)				
1	Does the changing area cause a problem?			
2	Are staff able to supervise changing appropriately and according to the needs and age of the children concerned?			
3	Are there any alternative changing arrangements available?			
F. School Transport				
1.	Does the child travel by school bus or taxi?			
2.	Do the arrangements for travelling by school transport cause a problem?			

Future proximity of the perpetrator(s) and victim(s) - School Routines

		YES	NO	RISK IDENTIFIED? If so transfer to Risk Management Action Plan
G.	Before School			
1.	Are arrangements for supervision before school adequate?			
2.	Do arrangements for coming into school pose problems, for example access to cloakroom areas?			
3.	Do arrangements for late arrivals cause any issues regarding supervision?			
H.	During Lessons			
1.	Are there any lessons or activities which pose additional risk, for example caused by the movement of children or due to levels of supervision required?			
I.	During Breaktimes			
1.	Is supervision adequate during breaktime, including the movement of children from classroom to playground?			
2.	Are arrangements for supervision adequate in the event of inclement weather necessitating indoor break time?			
J.	During Lunchtimes			
1.	Is supervision adequate in the lunch hall?			
2.	Does consideration need to be given to alternative provision over the lunch period, e.g. access to lunch club?			
3.	Are arrangements adequate in the event of inclement weather necessitating indoor lunchtime?			
K.	Outside School Hours/Special Events (Consider adding a specific section to risk assessment to address these issues where relevant).			
1.	Does consideration need to be given to any out of hours arrangements such as wrap around care or clubs?			
2.	Does the age range of children accessing wrap around care or clubs pose any additional risk?			
3.	Are there any forthcoming events in the school calendar which need to be planned for on an individual basis, e.g. school trips, sports days?			
4.	Are there any residential trips planned? <i>If so, an additional separate risk assessment is recommended.</i>			

Preventative Education Through PSHE Teaching

		YES	NO	RISK IDENTIFIED? If so transfer to Risk Management Action Plan
L	Children/Young People			
1	Have all children been taught what sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)?			
2	Have all children been taught about the concept of privacy and the implications of it for both children and adults; including that it is not always right to keep secrets if they relate to not being safe?			
3	Have all children been taught that each person's body belongs to them, and the differences between appropriate and inappropriate or unsafe physical, and other, contact.?			
4	Are all children aware of whom they can go to if they have a worry/concern?			

Raising Staff Awareness

		YES	NO	RISK IDENTIFIED? If so transfer to Risk Management Action Plan
M	Staff			
1	Have all staff, including volunteers and Governors, read Part 1 and Annex B of Keeping Children Safe in Education 2022 and are they aware of their safeguarding responsibilities?			
2	Are all staff (including volunteers) aware that child-on-child abuse forms part of the school's safeguarding response?			
3	Have all staff (including volunteers) received training about how to spot signs and indicators of abuse and how to respond to a child who makes a disclosure?			
4	Are all staff aware of the process for passing on concerns and aware of the identities of the Designated Safeguarding Leads and Deputies?			
5	Have all staff signed to say that they have read and understood the Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings 2022?			
6	Have all appropriate staff been informed of the concerns around this child on a 'need to know' basis?			

Child's Voice

It is good practice to try to elicit the child's views, obviously in a way which is appropriate to their age and stage of development, and to feed this into the Risk Management Action Plan. Questions it may be worth exploring with the child include: Whereabouts in school do they feel safe and unsafe? What times of day do they feel safe and unsafe? What could help them to feel safer? Which adult do they feel they can talk to in school about their worries?

Risk Management Action Plan

Identified Risk	Existing preventative and protective measures	Action: additional measures required	Who is responsible?	Timescale	How will you know that the risk has been reduced?

Completed by:

Role:

Today's Date:

Review Date:

**Shared with parent(s)/carer(s):
(Record names)**

Date shared with parents:

Risk Management Action Plan Review

Identified Risk	Existing preventative and protective measures	Action: additional measures required	Who is responsible?	Timescale	How will you know that the risk has been reduced?

Completed by:

Role:

Today's Date:

Further Review Date:

**Shared with parent(s)/carer(s):
(Record names)**

Date shared with parents:

