THE PERSE
SCHOOL
CAMBRIDGE

Risk Assessment Policy for Pupil Welfare

The Perse School, Cambridge

September 2026

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1 Introduction

1.1 This is the *Risk Assessment Policy for Pupil Welfare* of The Perse School (the **School**), which comprises the Relevant Schools (the Perse Pelican Nursery and Pre Preparatory School including the EYFS setting (the **Pelican School**), the Perse Prep School (the **Prep School**) and the Perse Upper School (the **Upper School**).

1.2 **Scope and Application:** This policy applies to the whole School including the Early Years Foundation Stage (EYFS).

1.3 **Publication and availability:** This policy is published on the School website and is available in hard copy on request. A copy of the policy is available for inspection from the School office during the School day.

This policy can be made available in large print or other accessible format if required.

1.4 **Purpose:** The aims of this policy are as follows:

1.4.1 to reduce the likelihood that pupils are harmed through negligence, lack of foresight or proper planning by setting out the School's active approach to managing risk to pupil welfare;

1.4.2 to implement a framework for the identification and assessment of risk(s) to pupil wellbeing[1] and a systematic approach to ensuring that appropriate action is taken to reduce the risks that are identified;

1.4.3 to promote a child-centered approach to safeguarding and a culture of safety, equality and protection;

1.4.4 to actively safeguard and promote the welfare and well-being of pupils of the School; and

1.4.5 to consider welfare issues in a wider context rather than analysing single behaviours in order to make informed decisions.

1.5 This policy has been prepared to meet the School's responsibilities under:

1.5.1 Education (Independent School Standards) Regulations 2014 in particular Part 3, paragraph 16 which requires the Governors to ensure that the welfare of the pupils at the School is safeguarded and promoted by the drawing up and effective implementation of a written risk assessment policy and appropriate action is taken to reduce risks that are identified;

1.5.2 EYFS Statutory framework for group and school-based providers (DfE, September 2026);

1.5.3 Children Act 1989;

1.5.4 Education and Skills Act 2008;

1.5.5 Childcare Act 2006;

[1] Wellbeing means wellbeing within the meaning of section 10(2) of the Children Act 2004 and includes physical and mental health and emotional wellbeing; protection from harm and neglect; education training and recreation; the contribution made by them to society and social and economic wellbeing

1.5.6 Equality Act 2010;

1.5.7 Health and Safety at Work etc. Act 1974;

1.5.8 Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 (together referred to as 'data protection laws'; and

1.5.9 Regulatory Reform (Fire Safety) Order 2005.

1.6 This policy has regard to the following guidance and advice:

1.6.1 Keeping children safe in education (DfE, September 2026) (**KCSIE**);

1.6.2 Independent School Standards Guidance for Independent Schools (DfE, April 2026) in particular paragraphs 4.26 - 4.28;

1.6.3 Working together to safeguard children (DfE, March 2026) (WTSC)

1.6.4 (The Prevent duty: safeguarding learners vulnerable to radicalisation DfE, September 2023)

1.6.5 Prevent duty guidance for England and Wales (HM Government, March 2024); Prevent duty guidance for England and Wales (2023) - GOV.UK

1.6.6 Preventing and tackling bullying: advice for headteachers, staff and governing bodies (DfE, July 2017/Last updated July 2026);

1.6.7 Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, May 2024);

1.6.8 Relationships Education, Relationships and Sex Education (RSE) and Health Education Guidance (DfE, December 2025);

1.6.9 Behaviour in schools; advice for headteachers and school staff (DfE, February 2024);

1.6.10 Mobile phones in schools (DfE, June 2026)

1.6.11 Searching, screening and confiscation; advice for schools (DfE, September 2022);

1.6.12 Working together to improve school attendance(DfE, August 2024 updated June 2026);

1.6.13 Children Missing Education (DfE, September 2025);

1.6.14 Providing remote education: guidance for schools (DfE, August 2024);

1.6.15 Mental health issues affecting a pupil's attendance: guidance for schools (DfE, August 2024);

1.6.16 Allergy safety in schools (DfE, July 2026);

1.6.17 Technical guidance for schools in England (Equality and Human Rights Commission, September 2025);

1.6.18 Mental health and behaviour in schools: guidance for schools (DfE, November 2018);

1.6.19 Generative AI: product safety expectations (DfE, January 2026).

The School policies, procedures and resource materials that are relevant to this policy are set out under the heading "4 - School policies". This policy should be read in conjunction with those.

2 Responsibilities

2.1 The Governors have overall responsibility for safeguarding and promoting pupil welfare and well-being at the School.

2.2 To ensure the efficient discharge of its responsibilities under this policy, the Board of Governors has allocated the following tasks:

Task	Allocated to	When / frequency of review
Approval of risk assessments	Upper School - Deputy Head (Pupil Development and Welfare) Prep School – Deputy Head Pelican School – Deputy Head	Ongoing and as completed
Keeping the policy up to date and compliant with the law and best practice	Upper School - Deputy Head (Pupil Development and Welfare) Prep School – Deputy Head Pelican School – Deputy Head	As required, and at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness.	Upper School - Deputy Head (Pupil Development and Welfare) Prep School – Deputy Head Pelican School – Deputy Head	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, Parents) to consider improvements to the School's processes under the policy	Upper School - Deputy Head (Pupil Development and Welfare) Prep School – Deputy Head Pelican School – Deputy Head	As required, and at least annually
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the UK GDPR	Upper School - Deputy Head (Pupil Development and Welfare) Prep School – Deputy Head Pelican School – Deputy Head	As required, and at least termly
Formal annual review	Board of Governors	Annually

2.3 At an operational level, the Head of each Relevant School (The Head) will:

2.3.1 ensure that the health, safety and wellbeing of pupils is suitably promoted;

2.3.2 ensure that all staff are aware of, and adhere to, the School's policies and procedures on pupil health, safety and welfare;

2.3.3 ensure that key staff have clearly established roles and responsibilities;

2.3.4 ensure that staff are appropriately trained to identify and deal with pupil welfare issues;

2.3.5 ensure that where concerns about a pupil's welfare are identified, the risks are appropriately managed;

2.3.6 consult with staff, pupils, parents and others, where appropriate, to find practical solutions to welfare issues;

2.3.7 ensure that standards of pupil welfare at the School are regularly monitored both at an individual level and across the whole school community to identify trends and issues of concern and to improve systems to manage these.

2.3.8 Monitor the implementation of this policy, as well as any action taken in response to a risk assessment and evaluate effectiveness.

2.4 Those named in paragraph 4 are responsible for carrying out risk assessments in relation to the specific matters of pupil health, safety and welfare covered in those policies.

3 Pupil welfare

3.1 The School recognises its responsibility to safeguard and promote the welfare of pupils in its care. This responsibility encompasses the following principles:

3.1.1 to promote a child-centred and co-ordinated approach to safeguard pupils' welfare;

3.1.2 to support pupils' physical and mental health and emotional wellbeing (as well as their social and economic well-being);

3.1.3 to identify children who may benefit from universal services and community based early help, those who may be in need and/ or those suffering, or likely to suffer, harm;

3.1.4 to highlight that the law on child-on-child abuse is there to protect them rather than criminalise them;

3.1.5 to identify pupils who may face additional safeguarding challenges and/or varying resilience levels from time to time;

3.1.6 to ensure there are clear policies and processes in place to ensure that stigma is reduced, and pupils feel comfortable talking about mental health concerns.

3.1.7 to take a whole school public health/preventative approach to harmful sexual behaviour;

3.1.8 to protect pupils from all types of abuse, violence, sexual violence, harassment, and exploitation and neglect;

3.1.9 to recognise that corporal punishment at the School can never be justified;

3.1.10 to provide pupils with appropriate education, training and recreation to keep themselves safe and well, including PSHE Education and Relationships Education and Relationships and Sex Education;

3.1.11 to encourage pupils to report concerns and to contribute to society;

3.1.12 to highlight the importance of ensuring pupils understand the law on child-on-child abuse is there to protect them rather than criminalise them;

to protect pupils from the risk of honour-based violence, FGM, radicalisation, extremism and being drawn into terrorism, modern slavery and human trafficking by actively promoting fundamental British values and providing appropriate support to those assessed as being vulnerable;

3.1.13 to ensure that pupils are provided with a safe and healthy environment so far as reasonably practicable;

3.1.14 to promote a whole-school approach to online safety and to protect pupils from the risks arising from the use of technology, including in its approach to filtering and monitoring;

3.1.15 to listen to and respect pupils and in particular to listen to pupils' complaints and concerns, to complaints and concerns raise by others about pupil wellbeing / welfare and to investigate and manage such concerns effectively; and

3.1.16 to work effectively with stakeholders and external agencies about issues of pupil welfare and ensure that appropriate training and support is provided to pupils.

3.2 In addition, when carrying out its assessments, the School will endeavour to take into account all relevant factors including, where appropriate:

3.2.1 a pupil's wishes and feelings, wherever possible;

3.2.2 a pupil's developmental needs;

3.2.3 their family circumstances;

3.2.4 the wider community context in which they are living;

3.2.5 wider contextual issues such as environmental and/or other extra-familial threats and/or new and emerging threats e.g. online threats.

3.3 The School addresses its commitment to these principles through prevention and protection measures:

3.3.1 **Prevention** - ensuring that all reasonable measures are taken to minimise the risk of harm to pupils and their welfare by:

(a) ensuring through training that all staff are aware of and committed to this policy and the values set out;

(b) having clear policies for pupils on behaviour and bullying;

(c) establishing a positive, supportive and secure environment in which pupils can learn and develop;

(d) including in the curriculum, sport and recreation arrangements, activities and opportunities for PSHE and relationships education and relationships and sex education which equip pupils with skills to enable them to protect their own welfare and that of others;

(e) providing appropriate medical and pastoral support that is accessible and available to all pupils;

(f) providing pupils with the confidence and a mechanism to raise any problems, concerns or complaints they may have; and

(g) providing support as soon as a problem emerges at any point in a child's life and taking appropriate action in accordance with the Cambridgeshire Safeguarding Children Partnership Board referral threshold document. The School will, in particular, be alert to signs of abuse and neglect, signs of serious violence and to the potential need for universal services and community-based early help services and/or targeted early help provided through Family Help arrangements; and

(h) creating a culture and environment that promotes pupil welfare, deters abuse and challenges inappropriate behaviour.

3.3.2 **Protection** - ensuring all appropriate actions are taken to address concerns about the welfare of a pupil, whether of a safeguarding nature or otherwise. This includes:

(a) having a zero-tolerance attitude to abuse, maintaining an attitude of "it could happen here";

(b) ensuring that pupils, staff and others, where necessary, are aware of the School's relevant processes and procedures and what is expected of them;

(c) taking immediate and appropriate action in response to concerns about a child's welfare (even if they are considered to be low level and/or they do not presently meet the harm thresholds) and by keeping appropriate records;

(d) managing the issue or concern in line with the appropriate policy, procedure or guidance and pastoral support processes;

(e) proactively sharing information to help identify, assess and respond to risks or concerns about the safety and welfare of children with appropriate colleagues, agencies and involving pupils and their parents appropriately; and

(f) being aware of changing or emerging threats to pupil welfare such as significant public health and security related incidents, increased reports of child-on-child abuse or emerging online or technological issues.

3.4 The School recognises that pupil welfare and well-being can be adversely affected by many matters whether in or away from school, online or offline, including abuse, bullying, violence and harassment, radicalisation, behavioural and health issues (both mental and physical).

3.5 The school recognises that short term stress and worry is a normal part of life, and many issues can be experienced as mild or transitory challenges for some pupils, however, others will experience more serious and longer lasting effects. The same experience can have different effects on different children depending on other factors in their life, and where a problem is particularly severe or persistent over time, or where a number of these difficulties are

experienced at the same time, pupils are described as experiencing mental health problems. Staff should remain alert to potential warning signs of deteriorating mental health and ensure that concerns are identified, recorded and acted upon promptly in accordance with the School's Safeguarding and child protection policy.

3.6 Pupils may not feel ready or know how to tell someone that they are being abused, exploited, neglected and / or may not recognise their experiences as harmful. In accordance with the School's *Safeguarding and Child Protection Policy*, staff should seek to build trusted relationships with pupils to facilitate communication. Barriers to communication should not prevent staff exercising professional curiosity and speaking to the Designated Safeguarding Lead (DSL) if they have concerns about a pupil.

4 School Policies

4.1 The School has developed this policy and the policies in the table below, which set out full details of its procedures to safeguard and promote pupil health, safety and welfare

4.2

Policy	**Overall responsibility for implementation of policy and authorisation of risk assessments**
Safeguarding and child protection policy and procedures (including missing pupil policies)	Designated Safeguarding Lead for the Relevant School
Recruitment, selection and disclosure policy and procedure	Director of HR and Senior Deputy Head
Staff Code of Conduct	Deputy Head (Pupil Development and Welfare)
Dignity at work policy	Director of Human Resources
Anti-bullying policy (pupils)	Deputy Head (Pupil Development and Welfare) – Upper School Deputy Head – Prep School Deputy Head – Pelican School
Attendance Policy	Deputy Head (Pupil Development and Welfare) – Upper School Deputy Head – Prep School Deputy Head – Pelican School
Behaviour and discipline policy /alcohol policy / anti-drugs policies/Acceptable Use of ICT Policy for Pupils	Deputy Head (Pupil Development and Welfare) – Upper School Deputy Head – Prep School Deputy Head – Pelican School
Relationships education/Relationships and Sex Education Policy	Deputy Head (Pupil Development and Welfare) – Upper School Deputy Head – Prep School Deputy Head – Pelican School

Acceptable use of ICT policy for pupils	Director of ICT
Online safety policy	Director of ICT/Designated Safeguarding Lead
Health and safety policy	Director of Operations
First aid policy	Director of Operations
Administration of medication policy / Health care procedure	Director of Operations
Allergy and Anaphylaxis policy	Director of Operations Deputy Head (Pupil Development and Welfare) – Upper School Head – Junior Division
Policy on Special Educational Needs (SEN) (or SEND) and English as an Additional Language (EAL) policy Accessibility plan	Head of Learning Support Director of Operations
Educational visits policy	Educational Visits Coordinator of the Relevant School

Policy	**Overall responsibility for implementation of policy and authorisation of risk assessments**
Supervision	Deputy Head (Pupil Development and Welfare) – Upper School Deputy Head – Prep School Deputy Head – Pelican School
Visitors and visiting speakers policy	Deputy Head (Pupil Development and Welfare) – Upper School Deputy Head – Prep School Deputy Head – Pelican School

5 Risk assessment

5.1 Where a concern about a pupil's welfare is identified, the risks to and the needs of that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified in accordance with the School's relevant policies or procedures as detailed above. The assessment and actions identified will usually be recorded in writing and regularly monitored and reviewed. More guidance on risk assessment can be found in Appendix 1.

5.2 The format of risk assessment may vary and may be included as part of the School's overall pastoral support system in response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate) or by using the attached risk assessment form at Appendix 2 and / or the Pupil Welfare Summary at

Appendix 3. Where a pupil has a diagnosed allergy or is otherwise identified as being at risk of an allergic reaction, the School will consider whether an individual risk assessment and/or healthcare plan is required in accordance with its Allergy and Anaphylaxis policy. Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

5.3 The information obtained through this process and the action agreed will be shared, as appropriate, with other staff, parents and third parties in order to safeguard and promote the welfare of a particular pupil or of pupils generally.

5.4 Risk assessments are stored on SharePoint. Assessments relating to individual pupils will be held on their pupil records.

6 Reporting and information-sharing

6.1 When assessing risks to pupil welfare and well-being at the School, all staff should also consider whether the matter should be reported internally and / or to external agencies and /or regulatory bodies, including but not restricted to, Children's Social Care, the police (including, in relation to those identified as being at risk of radicalisation, the Lead Prevent Officer (Cambridgeshire Police)), the Channel Police Practitioner, the Modern Slavery Trafficking Unit of the National crime Agency, Ofsted, the ISI, CAMHS and/or the Charity Commission.

6.2 The procedures for reporting safeguarding concerns are set out in the School's *Safeguarding and Child Protection Policy*. Consideration will be also be given to the need for the School to report a matter to the Modern Slavery Trafficking Unit of the National Crime Agency.

6.3 The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the School's paramount concern. Schools have clear powers to share, hold and use information for these purposes and data protection laws provide a framework to ensure that personal information is shared appropriately.

6.4 The School will cooperate and adopt an active approach with Children's Social Care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of universal services and community-based early help assessments, and assessments and child protection investigations under the Children Act 1989.

6.5 The DSL will take a lead role in all cases where a pupil is detained and questioned by the Police, to ensure that the pupil is supported by an appropriate adult in line with PACE Code C (Code of Practice for the detention, treatment and questioning of persons by Police Officers). The role of the appropriate adult is to:

6.5.1 Support, advise and assist the pupil when they are given or asked to provide information or participate in any procedure;

6.5.2 Observe whether the police are acting properly and fairly to respect the pupil's rights and entitlements, and inform an officer of the rank of inspector or above if they consider that they are not;

6.5.3 Assist the pupil to communicate with the police whilst respecting their right to say nothing unless they want to; and

6.5.4 Help the pupil understand their rights and ensure that those rights are protected and respected.

6.6 The School monitors pupil attendance and shall inform the applicable local authority in the appropriate circumstances of any pupil who is going to be added to or deleted from the School's admission register. The School will consider whether it is necessary to liaise with the local authority in circumstances where a parent has expressed an intention to home educate a child.

7 Training

7.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

7.2 The level and frequency of training depends on the role of the individual member of staff and the need for them to complete risk assessments as part of their role.

7.3 The School maintains written records of all staff training.

8 Record keeping

8.1 The School will retain records of all welfare concerns, discussions and decisions made and the reasons for those decisions. This is likely to include the significant findings of relevant risk assessments.

8.2 All records created in accordance with this policy are managed in accordance with the School's *Records Management Policy* and *Records Retention Schedule*.

8.3 The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School

has published privacy notices on its website which explain how the School will use personal data. The School's approach to data protection compliance is set out in the School's Data Protection Policies and Procedures. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy. This includes the School's *Data Protection Policy* and *Information Security and Sharing Data Guidance*.

9 Monitoring and review

9.1 Relevant risk assessments and any action taken in response to risk assessments will be monitored regularly in order to ensure that pupil welfare issues are being appropriately managed, and to ensure that any potential patterns are identified, including patterns of low-level concerning, problematic or inappropriate behaviour.

9.2 This policy and related school procedures will be reviewed annually by the Board of Governors as part of the annual review of safeguarding and updated as necessary.

10 Version Control

Date of adoption of this policy	3 September 2026
Date of last review of this policy	August 2026
Date for next review of this policy	August 2027
Policy owner (SLT)	Upper School – Deputy Head (Pupil Development and Welfare) Prep School - Head Pelican School - Head
Authorised by	Jonathan Scott On behalf of the Board of Governors
Circulation	Governors / teaching staff / all staff / parents / pupils [on request] Published on the School's website and PersePortal and available from the School Office on request
Status	Complies with the Education (Independent School Standards) Regulations 2014 (SI2014/3283)

Appendix 1: Guidance on risk assessment

A pupil welfare risk assessment is a careful examination of what could cause harm to pupil welfare and a consideration of appropriate control measures, so that you can weigh up whether the School has taken adequate precautions or should take additional steps to prevent the risk of harm. To be effective, a risk assessment must make clear what staff should be doing to reduce the risks pupils face.

Risk assessment can also be used to weigh up the decision to be taken.

The risk assessment process is not intended to create huge amounts of paperwork, and neither should it be viewed as purely a tick box exercise. Its purpose is to identify sensible measures to control real risks - those that are most likely to occur and /or will cause the most harm if they do. Risk assessments will be concise and focused on determining appropriate ways to eliminate a hazard or control the risk when a hazard cannot be eliminated.

When thinking about your risk assessment in this context, remember:

- a welfare issue is anything that may harm a pupil; to include sexual violence, sexual harassment, cyber-bullying, harmful sexual behaviour, abuse and the risk of radicalisation and extremism.
- the risk is the chance that a pupil could be harmed, together with an indication of how serious the harm could be if it occurs.

Step 1: Identify the issue

First you need to work out how pupils could be harmed. This will generally be set out in the concern raised about a pupil's welfare or as a result of monitoring patterns or issues affecting pupils' welfare generally at school.

Step 2: Decide who might be harmed and how

Identify individual pupils or groups of pupils who might be harmed and how they might be harmed by the concern raised. Complete a separate pupil welfare risk assessment for each pupil and use the checklist in Appendix 2 to help identify risks and protective factors. This may include an assessment of the needs of any potential victim(s) and/or alleged perpetrators and other children who may be at risk.

Step 3: Decide on the appropriate format for the risk assessment

Consider what format of risk assessment is most appropriate. For all cases of alleged sexual violence and in serious cases of sexual harassment the Local Authority risk assessment found in Appendix 5 should be used.

Relevant factors to take into account when considering if/which risk assessment is most appropriate would include:

- Risk of harm;
- Severity of allegations;
- Time and place of alleged incident, and actions required to make the situation safer;
- Urgency of mitigation steps;
- In practice, balancing the merits of recording a specific contemporaneous risk assessment against other demands on resources at the time;
- Impact of mitigation steps on any affected party, including victims, alleged perpetrators and parents.

In the majority of cases where the risk relates to the welfare of an individual pupil, a **pupil welfare sheet** is likely to be appropriate. This allows teachers to adequately provide for that pupil. For more serious cases where a pupil is at risk of serious harm or where decision making is complex or where the risk assessment relates to the interaction between pupils (e.g. instances of bullying or child-on-child-child abuse) a full risk assessment (found in Appendix 3) is likely to be appropriate. The rationale for the format of the risk assessment should be recorded.

Step 4: Evaluate the risks and decide on precautions

Decide what to do about the risks.

Compare what you currently do with what is required by law, DfE guidance or is accepted good practice. If there is a difference, list what needs to be done to protect the pupil's welfare. Where appropriate take into account any special requirements or protected characteristics. Identify how information should be shared and follow any procedures regarding the internal authorisation of suggested precautions.

Step 5: Record your findings and implement them

Make a written record of your significant findings - the concern, the issues, how pupil(s) might be harmed and what arrangements the School has in place to control those risks.

There is no prescribed format for this record, but any record produced should be simple and focussed on control measures and the steps the School proposes to take to manage the risk.

If the assessment is that the behaviour is of such high risk even with control measures in place that it could not be adequately managed in the school setting, consideration will need to be given to alternative plans for managing the pupil(s) presenting the alleged behaviour.

Step 6: Relevant consultation

Where required, permitted or appropriate, meet with the pupil, the pupil's parent(s) or carer(s) or third party e.g. professional involved with the pupil to discuss the risks and wishes and feelings of the pupil.

Step 7: Review your risk assessment and update, if necessary

Assessment should be a dynamic process which analyses and responds to the changing nature and level of need and/or risk. You should review what you are doing for the pupils identified and across the School generally and monitor and review the efficacy and / or the outcome of the measures you have put in place on a regular basis, or as required. This is particularly important when you are managing complex welfare issues such as child-on-child abuse, where both pupils remain in school.

Risk Assessment Considerations – Pupils with Mental Health Needs

This appendix should be read alongside the main body of the Pupil Welfare for Risk Assessment Policy, specifically Appendix 1, and applied in accordance with the school's safeguarding and SEND Policies where a pupil has an actual or suspected mental health need.

Staff should be alert to potential warning signs that a pupil may be experiencing mental health difficulties or be at risk of self-harm or suicide. Such signs may include significant changes in behaviour, ongoing difficulty sleeping, withdrawal from social situations, loss of interest in activities previously enjoyed, physical signs of self-harm or neglecting personal care. The presence of one or more warning signs does not necessarily indicate that a pupil has a mental health condition or is at risk of suicide, but should prompt appropriate professional curiosity, further consideration and, where appropriate, discussion with the

designated safeguarding lead.

It is not intended that staff should use this appendix to diagnose any specific mental health condition. Where staff have concerns, appropriate professional and/or medical support should be sought and/or signposted, where necessary.

All assessments must be reviewed regularly and updated in light of any changes in the pupil's condition or circumstances.
When conducting a welfare risk assessment for a pupil experiencing actual or suspected mental health problems, the following considerations should be addressed:

1 Nature and Severity of the Pupil's mental health needs

Assess the specific nature, diagnosis (if known), and severity of the pupil's mental health difficulties, including:

1.1 Any formal diagnosis (e.g. anxiety, depression, PTSD, OCD, eating disorder etc.);

1.2 Whether the pupil is under the care of CAMHS, GP, or another medical/therapeutic professional;

1.3 Patterns of mental health presentation (e.g. deterioration, improvement, fluctuations);

1.4 History of mental health episodes, including self-harm, suicidal ideation, or psychiatric admissions.

2 Impact on education and participation

Consider how the pupil's mental health affects their ability to engage in school life:

2.1 Impact on attendance, punctuality, or school refusal;

2.2 Difficulty concentrating or completing tasks;

2.3 Withdrawal from learning or social activities;

2.4 Avoidance of specific subjects, classrooms, or staff;

2.5 Effects on peer relationships or social interaction.

Identify reasonable adjustments that could be made to improve the pupil's ability to engage, for example, timetabling, reduced workload, rest breaks, safe spaces etc.

3 Environmental and Triggers

Identify any environmental conditions within the school that may exacerbate mental health symptoms:

3.1 Sensory overstimulation (e.g. noise, crowds, chaotic settings).

3.2 Transitions between classes or key stages.

3.3 Academic pressure (e.g. assessments, deadlines).

3.4 Social pressure or bullying (including online and through the use of generative AI).

3.5 Isolation or exclusion from activities.

4 Risk to self

Assess whether the pupil poses any risk to their own safety:

4.1 Risk of self-harm (e.g. cutting, burning, hair-pulling, etc.).

4.2 Suicidal ideation or attempts.

4.3 Eating disorders that may affect physical wellbeing.

4.4 Substance misuse.

4.5 Risk of absconding or running away from school premises.

4.6 Any relevant safeguarding disclosures made by the pupil.

5 Risk to others

Determine whether the pupil's behaviour places others at risk:

5.1 Physical aggression or violent outbursts.

5.2 Intimidation, threats, or emotional dysregulation affecting peers or staff.

5.3 Inadvertent distress caused by disclosure of personal issues (e.g. graphic descriptions of self-harm).

5.4 Disruption to learning environment or school operations.

Appendix 2: (Non-exhaustive) Checklist of factors to consider for a risk assessment of pupil welfare

In assessing the risks, the assessor should consider the factors listed below as well as using the factors to consider any involvement from outside agencies, for example requests for universal services and community based early help services and/or targeted early help provided through family Help arrangements. The factors should be used to assess the nature and level of risk posed and / or faced by the pupil(s) in school including in relation to location, activities, contact with specific pupils, transport to and from school and contexts outside school.

Pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and / or may not recognise their experiences as harmful for a number of reasons; they may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and / or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

Child's developmental needs

Age and understanding: e.g. developmental stage, concerns about developmental delay.

Health: e.g. physical health issue e.g. serious allergies or anaphylaxis / disability, mental health issue e.g. depression, self-harm, exhibits signs of an eating disorder, drug or alcohol use, smoking, suspicion of child being prepared for FGM, unsafe / inappropriate / abusive sexual behaviour, unmet medical needs e.g. failure to access medical attention, concerns about developmental delay.

Education: e.g. at risk of child-on-child abuse, exclusions, being missing from education (including for parts of the school day), frequent moves of school, behaviour record, SEND needs e.g. ASD, under / overachiever, poor home-school relationship.

Emotional and Behavioural development: e.g. display of extremist views, anti-social behaviour, illegal / offending behaviour, personality trait issues e.g. self-imposed goals, a one off incident or sustained pattern, is the behaviour at risk of escalating, what is the frequency of the behaviour.

Identity: e.g. gender, low self-esteem, sexuality.

Family and Social relationships: e.g. power imbalance, peer groups, social media / internet use, risk of bullying / being bullied, risk of sexual harassment and / or sexual violence, child / young person beyond parental control, at risk of modern slavery, trafficking or child sexual exploitation and or child criminal exploitation, is frequently missing / goes missing from care or from home, concerns about any other adult, including a staff member.

Social Presentation: e.g. social problems, lack of friendship groups, child's online presence.

Self-care Skills: e.g. lack of care of appearance, lack of personal hygiene, unsuitable clothing.

Child's wishes and views: e.g. reporting to police, choice.

Family and environmental factors

Community Resources: e.g. negativity towards family, non-engagement with services.

Parents and Carers:

Basic Care, Safety and Protection: e.g. suspected / actual physical / emotional / or sexual abuse or neglect, appropriate supervision e.g. nannies / drivers / home alone arrangements.

Parental health problems: young carer, serious illness in family, drug / alcohol dependent parent and parent mental health issues.

Emotional Warmth: e.g. expectations of performance / pressure to achieve, poor attachment.

Guidance, Boundaries and Stimulation: e.g. boundaries unclear / not enforced, parents involved with criminal activity.

Family History and Functioning: e.g. boarder, divorce, parental relationship tensions e.g. potential breakup / difficulties with stepparent, domestic abuse, single parent, absent parents, challenging sibling, Looked After Child, previous involvement with CSC, adopted child, privately fostered child, loss of significant adult, caring responsibilities, mental health issues.

Anti-social or criminal behaviour: e.g.: showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.

Housing, Employment and Finance: e.g. loss of parental income / job, inappropriate housing, asylum seeker.

Family's Social Integration: e.g. lack of support networks, family socially excluded.

Appendix 3: Example template risk assessment

Concern / welfare issue:

Person(s) who may be relevant to the concern: [• name of pupil(s), e.g. alleged victim, alleged perpetrator, bystanders, all pupils, staff][2]

Person(s) consulted for the purposes of the risk assessment: [• names of pupil(s), parents / carers, staff, third parties e.g. a professional, police, CSC]

Other organisations to be contacted: [• e.g. other school, reporting obligations]

Issues relating to confidentiality:

What are the risks / causes of harm?	**Who might be harmed and how?**	**How might they be harmed? What are the factors to be assessed?**	**What is the level of risk? L/M/H**	**What measures are already in place?**	**What further action is necessary?**	**Action by whom?**	**Action by when?**	**What is the new level of risk? L/M/H**	**Action completed?**	**Review date** By Whom? Comments
e.g. alleged bullying of Pupil A by Pupil B	Pupil A	Childs Development Needs Pupil A exhibits behaviour that is below an age expected level, recorded	M	Both pupils have been interviewed and investigation is ongoing.	Pupil A should not sit next to Pupil B in class. Lunchtime staff and playground supervisors to keep an eye on Pupils A and B at break times	Class teacher Lunch time and playground supervisors	Immediately Immediately	L	Yes - communicated to staff on [• 00 month year]	3 weeks Class teacher

[2] Staff at risk will not be assessed under this policy.

What are the risks / causes of harm?	Who might be harmed and how?	How might they be harmed? What are the factors to be assessed?	What is the level of risk? L/M/H	What measures are already in place?	What further action is necessary?	Action by whom?	Action by when?	What is the new level of risk? L/M/H	Action completed?	Review date By Whom? Comments
		development al delay. Potential power imbalance between Pupil A and B. Pupil B potentially developing a pattern of behaviour, second incident.			and report any incidents to [• name].					
Pupil A has been overheard telling Pupil B that [• he / she] intends to travel to Syria to live	Pupil A, (Pupil B and other pupils - not currently subject to a separate risk assessment.)	Childs Development Needs Behaviour log records many incidents of concern.	H	Both Pupil A and B have been spoken to and interviewed by the DSL and the parents, the police and children's social	Pupil A should be referred to the Channel Programme. Obtain pupil and parent consent to engage in the	DSL DSL	Immediately	M	Yes Referred to the Channel Programme on [• 00 month year]	1 week DSL

What are the risks / causes of harm?	Who might be harmed and how?	How might they be harmed? What are the factors to be assessed?	What is the level of risk? L/M/H	What measures are already in place?	What further action is necessary?	Action by whom?	Action by when?	What is the new level of risk? L/M/H	Action completed?	Review date By Whom? Comments
a better life.		Low self-esteem Online presence suggests possible involvement with persons with known extreme views.		services have been informed.	Channel programme					
e.g. Pupil A has alleged that she was sexually touched by Pupil B on the bus on the way to school.	Pupil A, (Pupil B and other pupils subject to own separate risk assessment.)	Childs Development Needs Pupil A has ongoing SEND needs. Lack of peer relationships for pupil A. Potential power	H	Referral has been made to children's social care on the same day, submitting a MARF (Multi Agency Referral Form) for both children. The MARF led to immediate	Pupil B to have an amended timetable so that he is not in any class with Pupil A (to be kept under review pending further advice	DSL	Immediately	M	Yes Pupil B timetable amended. Specific staff informed. Trusted adult agreed with Pupil A	3 days or immediately upon contact from CSC / police Consideration to be given to aspects of school's systems e.g. staff training

What are the risks / causes of harm?	Who might be harmed and how?	How might they be harmed? What are the factors to be assessed?	What is the level of risk? L/M/H	What measures are already in place?	What further action is necessary?	Action by whom?	Action by when?	What is the new level of risk? L/M/H	Action completed?	Review date By Whom? Comments
		imbalance between pupil A and B. Has Pupil A suffered physical harm due to Pupil B's alleged actions.		police involvement. There are presently no bail conditions or recommendations that Pupil B is suspended.	from authorities) Specific teaching staff to be briefed on the need to ensure the children are not together. Pupil A given a trusted adult she could go to at any time: staff member will meet with her regularly and support her with break and lunchtime arrangements	Teaching staff Trusted adult				on child-on-child abuse

What are the risks / causes of harm?	**Who might be harmed and how?**	**How might they be harmed? What are the factors to be assessed?**	**What is the level of risk?** L/M/H	**What measures are already in place?**	**What further action is necessary?**	**Action by whom?**	**Action by when?**	**What is the new level of risk?** L/M/H	**Action completed?** By Whom? Comments	**Review date** By Whom? Comments
e.g. Pupil A regularly missing education due to concerns about CEV parent	Pupil A	Childs Development Need Increased risks to mental health risks Risk of falling behind with education Increased isolation and Pupil A at increased safeguarding risk of abuse or neglect	H	Report made to DSL School has reached out to Pupil A and her parents to understand and work through their concerns	Continue to support and work with Pupil A and parents to increase confidence in returning to school Stress the compulsory nature of school to parents and need to report to Local Authority if attendance does not improve	Head/DSL	Immediately	M	Yes Meeting held with parents Absence reported to Local Authority	1 week DSL

Risk assessment undertaken by: [• name of member of staff]

Date:

Authorised by Upper School - Deputy Head (Pupil Development and Welfare)

Prep School – Deputy Head

Pelican School – Deputy Head

Signed:

Date:

Review date:

Appendix 4: Pupil Welfare Summary

Name:

Risk Level 0/1/2/3

0 – no current concerns 1 – some concerns 2 – more long term/higher risk concerns 3 - high risk. Risk assessment in place which you **must read**.

The information in this document is CONFIDENTIAL (although taken from the pupil's SIMS file) and should only be read if you teach/come into regular contact with the pupil. It is designed to enable you to provide/target the best possible all round support to the pupil. Please do not print it/email it or share it with anyone. You should only discuss with the pupil or parents if there is good reason to do so and **only** after discussion with the pupil's tutor beforehand. If you have queries or concerns please contact the Tutor or Head of Year. Thank you.

Summary/background of difficulty

Details of risk to welfare

(Click on 'Choose an item' next to relevant risk to select drop-down to enter YES)]

Addiction (Gaming etc)
Anger
Anxiety
Eating Disorder
Family Bereavement
Family Illness
Family Relationships
Family Separation
Feelings of Paranoia
Finds Communication Challenges Difficult
Gets Overwhelmed
Holds High Standards
Missing Lessons, Vicious Circle Developing
Own Health
Lack of Self-Confidence
Low Mood
Low Self-Esteem
Motivation
OCD
Organisational Difficulties
Perfectionist Tendencies
Possible Confusion
Risk Taking Behaviours

Sleep Problems

Social Interactions

Suicidal Ideation

Unhelpful Coping Strategies

Very High Standard Set

Strategies to support pupil/minimise risk

(Click on 'Choose an item' next to relevant strategy to select drop-down to enter YES)

Allow brief drinks breaks/toilet breaks

Allow hoody and rings to be worn

Allow to wear noise cancelling headphones

Avoid asking direct questions if looking panicked

Avoid asking direct questions if time out card placed on desk

Avoid confrontation

Avoid direct questioning when student does not have their hand up

Be clear on work expectations

Be very calm and clear. Direct instructions.

Challenge any very high standards being expected by themself

Ensure they know what work is a must and what work is an "if you can"

Ensure working groups are pre-determined

Extra praise where warranted

Extra praise where warranted (ensure genuine as will take it literally)

Follow missing pupil procedure as a priority

Individual support can help

Monitor Any Change in Working Habits - indicator of more going on

Monitor Overworking

Monitor sudden drop in work produced

Monitor any undercurrent with peers

Monitor attendance/work submitted

Noise reducing headphones

Not to be too hard on themselves and see the positives

Offer Extra Praise and Reassurance

Offer Support When Anxious

Provide reassurance/clarification

Respond to 'acting out' calmly and firmly

Seating plan - please locate student towards back of the class

Seating plan - please locate student towards front of the class

Sharp objects (incl. cover slips/scissors): count out and in

Try not to respond to emotional outbursts with your own emotional response

Risk Assessment (Y/N)

Risk assessment Detail

Date Reviewed

Appendix 5: Secondary Schools Risk Assessment for Children and Young People who Exhibit Sexually Inappropriate/Harmful Behaviours

Cambridgeshire County Council

Risk Management Safety Plan for Children and Young People who Exhibit Sexually Inappropriate/Harmful Behaviours

For use by Secondary Schools/Colleges

Education Safeguarding Team

September 2025

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Keeping Children Safe in Education 2025 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 (2023) 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, December 2023)

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 2025)

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' (2010)'.

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 Includes misuse. of power Coercion and force to ensure victim compliance Intrusive Informed consent lacking or not able to be freely. given by victim. May include. elements of expressive violence	Physically violent sexual abuse Highly intrusive Instrumental violence which is physiologically. and/or sexually arousing to the perpetrator Sadism

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

The Child Sexual Abuse Assessment Tool (Cambridgeshire and Peterborough Safeguarding Children Partnership

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 2025)

Identifying Sexually Inappropriate/Harmful Behaviour

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 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 safety management plan may form part of that response.

The importance of High-Quality Relationships and Sex Education

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

- how to: determine whether children, adults or sources of information are trustworthy, judge when a family, friend, intimate or other relationship is unsafe…and how to seek help or advice.
- the characteristics of positive and healthy friendships (in all contexts, including online) including trust, respect, honesty, kindness, generosity, boundaries, privacy, consent and the management of conflict, reconciliation and ending relationships. This includes different (non-sexual types of relationship.
- that some types of behaviours within relationships are criminal including violent behavior and coercive control
- what constitutes sexual harassment and sexual violence and why these are always unacceptable
- the impact of viewing harmful content
- that sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail.
- the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, forced marriage, so called 'honour-based abuse' and FGM and how these can affect current and future relationships.
- how people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)

N.B. This is not a complete list of required content but are those aspects of Relationships and Sex (RSE) Education most pertinent to this risk safety management plan. -

Listening and responding to the views of pupils and parents helps to ensure that RSE meets pupils' needs and that topics are taught at the right time to support children to build positive relationships and avoid harms

It is also vital that you seek the opinions of all pupils, classroom activities, pupil surveys via school assembly, or your school/class councils about their perceptions of how safe they feel on the school premises.

A note on the use of terminology

Whilst this risk management safety plan makes use of the term's '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 2025)

The Purpose of the Risk Management Safety Plan

This risk management safety plan 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 concern and formulate further action plans through undertaking regular reviews. The risk management safety plan should outline the steps that need to be taken to ensure the safety of the victim(s), perpetrator(s) and pupil/staff body more widely. The risk management safety plan must be recorded (either written or electronic) and remain a live document which is kept under constant review.

This guidance and risk management safety plan 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., RSE Policy, the use of physical intervention to manage behaviour; anti-bullying; behaviour, discipline, and suspensions; transport; educational trips/visits; first aid, intimate care, internet safety and acceptable use of the internet.

How this Risk Safety Management Plan fits in with Statutory Guidance

Part 5 of Keeping Children Safe in Education: Child on Child Sexual Violence and Harassment, (September 2025), are essential reading prior to undertaking this risk management safety plan. These 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 2025)

The publication of Relationships and sex education (RSE) and health education - GOV.UK July 2025 highlights the duties on schools in this area are set out in legislation. 1 The Relationships Education, Relationships and Sex Education and Health Education (England) Regulations 2019, made under sections 34 and 35 of the Children and Social Work Act 2017, make relationships education compulsory for all pupils receiving primary education and

The use of this risk management safety plan 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 management safety plan 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 management safety plan 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 2025)

The risk management safety plan 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 safety plan accordingly.

The victim (s) and the alleged perpetrator (s) should have individualised plans.

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 (s), 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 2025)

How to use the Risk Management Safety Plan

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 these conversations are recorded on the initial log of concern outlining proposed actions and the decisions and rationale for those actions. Best practice would be to add any further discussions to each individual child's profile (update) chronologies rather than to the 'joint' log of concern as the responses to the actions, outcomes and any further actions are likely to be different and personalised to the victim and alleged perpetrator.

It is vital that when reports are made that all discussions, plans, actions, decisions and rationales as logged on the school's logging concern system at every stage for each pupil. Not all actions etc. will be pertinent to each

individual pupil so care needs to be taken when adding updates to the concern that these are only logged when it is relevant to the individual pupil. For example, if school have requested the support of Rape Crisis for the victim this would not be logged on the alleged perpetrators profile but only on the victims.

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-Behaviour-Assessment-Tool.pdf (safeguardingcambspeterborough.org.uk) (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 referenced in any subsequent referral to children's social care.

If behaviour is sexually inappropriate, it may be appropriate to involve Early Help (Targeted Support), 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. The Cambridgeshire Threshold Document: Continuum of Help and Support | Cambridgeshire and Peterborough Safeguarding Partnership Board should also be used to support your decision making.

To complete the risk management safety plan, you will need to involve all staff who work with the individual pupil(s) concerned. On completion of the risk management safety plan, 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. If this is the case, advice should always be sought from Children's Social Care. 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 Durham 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 (unless to do so would compromise any criminal investigation, advise from the police should be sought if the incident has warranted a police referral) 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 Police must collaborate in order assess risk, provide tailored interventions, reduce harm and protect victims. If other agencies are involved, then their specialist input should contribute to the risk safety management plan.

"Where there has been a report of sexual violence if it 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 2025)

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 management safety plan 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 management safety plan for each pupil involved, including the alleged victim(s), perpetrator(s) and other pupils directly affected.
- A review date is set at the time of completing the risk management safety plan.
- If similar behaviours are exhibited at a later date, the risk management safety plan should be reviewed and updated.
- All relevant staff are informed of decisions and changes to be made as a result of this risk management safety plan.
- 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 links listed below.

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)

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

Keeping children safe in education 2025

Relationships and sex education (RSE) and health education - GOV.UK
July 2025 to be implemented by September 2026

Working together to safeguard children - GOV.UK (www.gov.uk)

Cambridgeshire Sexual Behaviour Service
SexualBehaviourService365@cambridgeshire.gov.uk SexualBehaviourService@cambridgeshire.gov.uk.

Children's Social Care Referrals

Cambridgeshire Tel: **0345 045 5203**

Out of hours Tel: **01733 234724**

Early Help Hub Tel: **01480 376 666**

Multi Agency Safeguarding Hub (MASH) Tel: 01480 422737
Police Child Abuse Investigation Unit

Cambridgeshire and Peterborough Safeguarding Partnership Board – Safeguarding Children Partnership Board | Cambridgeshire and Peterborough Safeguarding Partnership Board (safeguardingcambspeterborough.org.uk)

The UK Safer Internet Centre provides an online safety helpline for professionals at helpline@saferinternet.org.uk - 0344 381 4772

Child Exploitation and Online Protection Centre - CEOP Safety Centre

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

Internet Watch Foundation - Internet Watch Foundation IWF - Eliminating Child Sexual Abuse Online | IWF

Kidscape – Help With Bullying | Bullying Advice | Kidscape

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

Report Remove - Report Remove | Childline

CEOP Education – CEOP Education (thinkuknow.co.uk)

UKCIS - Sharing nudes and semi-nudes: advice for education settings working with children and young people

NSPCC - Safeguarding, sexting and sharing nudes | NSPCC Learning June 2025

Young Minds - YoungMinds | Mental Health Charity For Children And Young People | YoungMinds

Risk Management Safety Plan for Children and Young People who Exhibit Sexually Inappropriate/Harmful Behaviours

Perse Upper

Completed by: **Date:**

Please note that this risk management safety plan is designed as a template and should be adapted to reflect the needs of the individual school, be flexible and individualised as it is made clear in statutory guidance that schools must consider every report of sexually inappropriate/harmful behaviour on a case-by-case basis. This initial risk management safety plan will require a prompt review if it has been deemed necessary to involve additional agencies for support. It will also be necessary for a review to take place as soon as possible if school are managing the incident internally. The purpose of the prompt initial and thereafter regular reviews is to move from a position where external controls are relied upon such as the adults taking all the responsibility to keep everyone safe, to a position where the child (ren) use internal controls and strategies they have learnt and take responsibility for keeping everyone safe. Once management safety plans have achieved their initial purpose and stopped the behaviours, the aim should be to reduce and ultimately cease the plans. The plan should not be overly punitive and needs to consider the parents/carers role in assisting with the plan.

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What incident, information, disclosure or allegation triggered this risk management safety plan?

If more than one young person was involved in the incident, a risk management safety plan should be undertaken for each child including the victim(s) and perpetrator(s).

Pupil Name:	DOB: and age	Gender
Current Attendance %:		EHA/CIN/CP:
Identified SEND/EHCP		
Alternative Provision/Managed Move- share what is relevant proportionate and necessary for the individual pupil (being mindful of GDPR for involved pupils that are not being supported elsewhere)		
Lead Professional: (if other involved services)		

Describe the identified risk **as factually as possible**. Bullet points often make this process clearer. Using full names state who was involved, where, when it happened, who observed and details of what happened. Remember to include the child/young person's voice including communication methods for non-verbal or those pupils with communication difficulties (consideration needs to be given to how hard this may be for the 'victim' to share so time, location and space needs to be given over and allow them to be supported by someone they feel comfortable with) and to 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 pupil

Risk categories to consider

Please note that this risk management safety plan is designed as a template and should be adapted to reflect the needs of the individual school and be individualised on a case-by-case basis 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 management safety plan in order to adequately consider the various areas of the school site accessed by the child to whom the risk management safety plan 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.

Initial risk checklist

A.	Continuing Education			RISK IDENTIFIED? If so transfer to Risk Management Safety Plan
1	Is the current placement and provision appropriate?			
2	If YES, give a brief outline of the educational provision provided and details of other agencies involved:			
3	If NO, give an outline of the proposed plans for education (if suspension is used as a sanction, please specify how education will be provided, by who and for how long it is estimated to continue)			
B.	**Police/YJS Involvement**	**Yes**	**No**	
1	Does this incident constitute a report of rape, assault by penetration or sexual assault?			If yes; when, how and by whom was information shared with police?
2	Has a crime (other than those outlined above)			If yes; when how and by whom was information shared with police?

	been committed?			
3	Is there a crime number and/or police reference numbers for points 1 and/or 2? If so, has this been noted/referenced on your logging concern system for each pupil involved?			
4	Are there any criminal convictions or cautions?			
5	Are there any bail conditions? (what are these and do they impact on their school attendance)			
6	Does the young person have an insight into the level of risk for themselves and others?			
C.	**Social Care Involvement**	**Yes**	**No**	
1	Has the child to whom this risk management safety plan relates been harmed or are they at risk of harm?			If yes, then this needs to be referred to children's social care. When, how and by whom was this referral made?

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

"…reports of rape and assault by penetration are likely to be especially difficult for the victim, and close proximity to the alleged perpetrator(s) is likely to be especially distressing. Whilst the school or college establishes the facts of the case and starts the process of liaising with local authority children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim. The school or college should also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school or college premises (including during any before or after school-based activities) and on transport to and from the school or college, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s).

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school or college premises and school or college transport, should be considered immediately."

(Keeping Children Safe in Education, Part 5, 2025)

D.	Identified risks in school/College	Yes	No	RISK IDENTIFIED? If so transfer to Risk Management Safety Plan
	Shared Classes			
1.	Do the victim(s) and alleged perpetrator(s) share any classes? *N.B. For reports of rape or assault by penetration, the alleged perpetrator should be removed from any classes they share with the victim. This should also be considered for other reports of sexual violence or harassment*			
	Where Shared Classes will continue			
2.	Are there areas within the classroom such as blind spots which could create a risk?			
3.	Are adjustments needed to seating plans and/or the layout of the classroom?			
4.	What arrangements are in place for young people and staff leaving the classroom? (for example, to attend support meetings, toilet, medical room)			
5.	Are there identifiable risks for practical subject areas where pupils may move around the room, for example: D&T, Art, Drama?			
	Transition spaces, corridors and indoor wet weather plans			
6.	Are young people supervised or able to be seen at all times (e.g., through windows)?			
7.	Are there any cupboards or empty rooms which could be accessible to young people?			
8.	When moving from one area to another, are young people supervised at all times?			
9	What considerations/plans will be put in place for indoor wet weather shared spaces.			
10	Are young people supervised or able to be seen at all times from all areas of the outdoor space?			
11.	Is there a need to make certain areas 'out of bounds' either temporarily or permanently?			

	Outside Areas	**Yes**	**No**	RISK IDENTIFIED? If so, transfer to Risk Management Safety Plan
12.	Do staffing levels afford adequate supervision of all areas?			
13.	Do you need to plan additional lunch and break time supervised activities?			
14.	Have 'safe spaces' been identified for both the 'victim' (s) and 'perpetrator' (s) if required?			
	Toilets and Changing Facilities for PE /swimming (this applies to in-school and external facilities).			
15.	Do the locations of, or access to, toilet facilities cause a problem?			
16.	Does the changing facilities cause a problem?			
17.	Are staff able to supervise changing appropriately, for all concerned, in line with their duty of care?			
18.	Are there any alternative changing arrangements available?			
E.	**School Transport, Trips and Residential Visits and other areas of risk**			
1.	Are there any risks relating to school transport before and after school/college?			
2.	Are there any forthcoming events in the school/college calendar which need to be planned for on an individual basis, e.g., sports days, collapsed timetable days?			
3.	Are there any planned visits, off site or residential visits that the children may be involved in? (DofE, After school clubs and trips) *An additional, separate risk management safety plan is recommended to address risks associated with trips and visits, especially residential trips.*			
4.	Is there a risk in the local community (e.g., local park if so, should this be a consideration and what can parents/carers contribute to ensure the safety of all children?)			
5.	Is there an increased risk of further abuse via social media? If so, what can parents/carers contribute to ensure the safety of all children?			

Preventative Education Through Relationships and Sex Education

F.	Young People	Yes	No	RISK IDENTIFIED? If so, transfer to Risk Management Safety Plan
1.	Have all young people been taught how to judge when a family, friend, intimate or other relationship is unsafe and how to seek help or advice?			
2.	Have all young people been taught the characteristics of positive and healthy friendships (in all contexts, including online) including: trust, respect, honesty, kindness, generosity, boundaries, privacy, consent and the management of conflicts, reconciliation and ending relationships?			
3.	Have all young people been taught how people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)?			
4.	Have all young people been taught what constitutes sexual harassment and sexual violence and why these are always unacceptable?			
5.	Have all young people been taught that some types of behaviours within relationships are criminal including violent behavior and coercive control?			
6.	Do all young people have an understanding that abuse can occur in intimate personal relationships?			
7.	Have all young people been taught the impact of viewing harmful content (online) and that sharing and viewing indecent images of children (including those created by children) is against the law and a criminal offence which carries severe penalties including jail?			
8.	Do all young people understand that possessing, making and distributing indecent images of children is a criminal offence in the UK irrespective of whether it is a real image or a pseudo-image – a pseudo-image being an image being created by AI, computer graphics or any other technology which otherwise appears to be a photograph.			
9.	Have all young people been taught how to report indecent images they may receive? And have they been sign posted to report remove images they may have sent?			
10.	Are all young people aware of whom they can go to if they have a worry/concern?			

Raising Staff Awareness

G.	Staff	Yes	No	RISK IDENTIFIED? If so, transfer to Risk Management Safety Plan
1	Have all staff, including volunteers and Governors, read Part 1 and Annex B of Keeping Children Safe in Education 2025 and are they aware of their safeguarding responsibilities?			
2	Are all staff (including supply staff and volunteers) aware that 'child on child' abuse forms part of the school's safeguarding response.			
3	Have all staff (including supply staff and volunteers) received training about how to spot signs and indicators of abuse and how to respond to a young person who makes a disclosure?			
4	Do all staff understand the range of sexually inappropriate/harmful behaviours from normal to abusive? Child Sexual Behaviour Assessment Tool | Cambridgeshire and Peterborough Safeguarding Partnership Board			
5	Are all staff aware of the process for passing on concerns and aware of the identities of the Designated Safeguarding Leads and Deputies?			
6	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?			
7	Have all appropriate staff been informed of the concerns around this young person on a 'need to know' basis?			

Young Person's Voice

Schools and colleges need to 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. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children."

(Keeping Children Safe in Education, Part 5, 2025)

''It is important to understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.''

''It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them".

(Keeping Children Safe in Education September 2025)

Childs voice/responses - alleged victim - things to note and consider.

Response of the child: for example, did they engage freely? Were they uncomfortable? Were they anxious or fearful? Were they able to share if there had been a level of coercion and/or an imbalance of power?

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/who could help them to feel safer?
- Which adult do they feel they can talk to in school about their worries?

Childs voice/responses- alleged perpetrator- things to note and consider.

Response of the child when challenged about the behaviour: (for example, were they defensive, denying, aggressive, angry, passive, embarrassed, regretful, accepting responsibility?)

What was attempted to address the behaviour and what was the child's response to that? For example, could the child be easily focused on another task, or were they difficult to distract and kept returning to the behaviour. Did they respond to the boundaries that were set?

Risk Management Safety Plan

Identified Risk	Existing preventative and protective measures	Action: additional measures required	Who is responsible? (Details of agencies supporting)	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): **Date shared with parent(s)/ carer(s):**

Risk Management Safety Plan- Review

Identified Risk	Existing preventative and protective measures	Action: additional measures required	Who is responsible? (Details of agencies supporting)	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): **Date shared with parents:**
(Record name)

Risk Management Safety Plan for Children and Young People who Exhibit Sexually Inappropriate/ **Harmful Behaviours**

For use by Primary Schools

Education Safeguarding Team

September 2025

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Keeping Children Safe in Education 2025 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 current 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, December 2023)

Children's sexual behaviour exists on a wide continuum **from normal and developmentally expected too 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 2025)

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 useful 'Continuum of children and young people's sexual behaviours'.

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 Includes misuse of power Coercion and force to ensure victim compliance Intrusive Informed consent lacking or not able to be freely given by victim May include elements of expressive violence	Physically violent sexual abuse Highly intrusive Instrumental violence which is physiologically and/or sexually arousing to the perpetrator Sadism

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 help 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 2025).

Identifying Sexually Inappropriate/Harmful Behaviour

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 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 management safety plan (***note Keeping Children Safe in Education uses the terminology 'Risk Assessment'***) may form part of that response.

The important of High-Quality Relationships Education

The focus for primary relationships education should be on teaching the skills and knowledge that form the building blocks of all positive relationships, supporting children from the start of their education to grow into kind, caring adults who have respect for others and know how to keep themselves and others safe.

It is important that primary relationship education includes:

- what sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
- how to keep themselves and others safe, and to recognise and report risks and abuse, including online.
- A focus on boundaries, privacy, and children's rights over their own bodies and personal information
- that each person's body belongs to them, and the differences between appropriate and inappropriate or unsafe physical, and other, contact.
- In late primary, schools may decide to discuss the pressure to share naked images if this is affecting pupils in the school. There may also be cases, such as when they know that pupils have seen pornography, in which schools may feel the need to discuss online sexual content (teaching should be age appropriate and respectful of all children, including those who may have no familiarity with the topics under discussion).

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

Listening and responding to the views of pupils and parents helps to ensure that RSE meets pupils' needs

and that topics are taught at the right time to support children to build positive relationships and avoid harms before they occur.

It is also vital that you also 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 the Cambridgeshire PSHE Service as part of their Primary Personal Development Programme. Schools should also inform parents of any deviation from their published RSE policy in advance and share any relevant materials with them on request (such as responding to discussions about the risks of online sexual content such as pornography)

The Purpose of the Risk Management Safety Plan

This risk management safety plan 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 further action plans through undertaking regular reviews. The risk management safety plan should outline the steps that need to be taken to ensure the safety of the victim(s), perpetrator(s) and pupil/staff body more widely. The risk management safety plan must be recorded (either written or electronic) and remain a live document which is kept under constant review.

This guidance and risk management safety plan 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., RSE Policy, the use of physical intervention to manage behaviour; anti-bullying; behaviour, discipline and suspensions; 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

Part 5 of Keeping Children Safe in Education: Child on Child Sexual Violence and Harassment, (September 2025), are essential reading prior to undertaking this risk management safety plan. 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 2025)

The publication of Relationships and sex education (RSE) and health education - GOV.UK July 2025 highlights the duties on schools in this area as set out in legislation. 1 The Relationships Education, Relationships and Sex Education and Health Education (England) Regulations 2019, made under sections 34 and 35 of the Children and Social Work Act 2017, make relationships education compulsory for all pupils receiving primary education and relationships and sex education (RSE) compulsory for all pupils receiving secondary education.

The use of this risk management safety plan 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 management safety plan 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 2025)

The risk management safety plan 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 safety plan accordingly.

The victim (s) and the alleged perpetrator (s) should have individualised plans.

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 2025)

A note on the use of terminology

Whilst this risk management safety plan makes use of the term's 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 2025)

How to use the Risk Management Safety Plan

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 these conversations are recorded on the initial log of concern outlining proposed actions and the decisions and rationale for those actions. Best practice would be to add any further discussions to each individual child's profile (update) chronologies rather than to the 'joint' log of concern as the responses to the actions, outcomes and any further actions are likely to be different and personalised to the victim and alleged perpetrator.

It is vital that when reports are made that all discussions, plans, actions, decisions and rationales are logged on the school's logging concern system at every stage for each pupil. Not all actions etc. will be pertinent to each individual pupil so care needs to be taken when adding updates to the concern that these are only logged when it is relevant to the individual pupil. For example, if school have requested the support of Rape Crisis for the victim this would not be logged on the alleged perpetrators profile but only on the victims.

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 referenced in any subsequent referral to children's social care.

If behaviour is sexually inappropriate, it may be appropriate to involve Early Help (Targeted Support), 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/or 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. The Cambridgeshire Threshold Document: Continuum of Help and Support | Cambridgeshire and Peterborough Safeguarding Partnership Board should also be used to support your decision making.

To complete the risk management safety plan, you will need to involve all staff who work with the individual pupil(s) concerned. On completion of the risk management safety plan, 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 by a family member. If this is the case, advice should always be sought from Children's Social Care. 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 Durham 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 (unless to do so would compromise any criminal investigation, advise from the police should be sought if the incident has warranted a police referral) 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 Police 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 if it 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 2025)

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 management safety plan 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 management safety plan for each pupil involved, including the alleged victim(s), perpetrator(s) and other pupils directly affected.
- A review date is set at the time of completing the risk management safety plan.
- If similar behaviours are exhibited at a later date, the risk management plan should be reviewed and updated.
- All relevant staff are informed of decisions and changes to be made as a result of this risk management plan.
- 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 links listed below.

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)

Harmful Sexual Behaviour Resources from University of Durham
https://www.contextualsafeguarding.org.uk/

Keeping children safe in education 2025

Personal Safety units of work available from Cambridgeshire PSHE Service as part of their Primary Personal Development Programme.

Relationships Education, Relationships and Sex Education and Health Education guidance.
July 2025 to be implemented by September 2026

Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children, December 2023

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

Cambridgeshire Sexual Behaviour Service
SexualBehaviourService365@cambridgeshire.gov.uk SexualBehaviourService@cambridgeshire.gov.uk.

Children's Social Care Referrals
Cambridgeshire Tel: **0345 045 5203**

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

Multi Agency Safeguarding Hub (MASH) Tel: 01480 422737
Police Child Abuse Investigation Unit

Other useful Points of Reference:

Cambridgeshire and Peterborough Safeguarding Partnership Board – Safeguarding Children Partnership Board | Cambridgeshire and Peterborough Safeguarding Partnership Board (safeguardingcambspeterborough.org.uk)

The UK Safer Internet Centre provides an online safety helpline for professionals at - helpline@saferinternet.org.uk - 0344 381 4772

Child Exploitation and Online Protection Centre - CEOP Safety Centre

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

Internet Watch Foundation - Internet Watch Foundation IWF - Eliminating Child Sexual Abuse Online | IWF

Kidscape – Help With Bullying | Bullying Advice | Kidscape

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

Report Remove - Report Remove | Childline

CEOP Education – CEOP Education (thinkuknow.co.uk)

UKCIS - Sharing nudes and semi-nudes: advice for education settings working with children and young people

NSPCC - Safeguarding, sexting and sharing nudes | NSPCC Learning June 2025

Young Minds - YoungMinds | Mental Health Charity For Children And Young People | YoungMinds

Risk Management Safety Plan for Children and Young People who Exhibit Sexually Inappropriate/ Harmful Behaviours

Perse Pelican / Prep

Completed by: Date:

Please note that this risk management safety plan is designed as a template and should be adapted to reflect the needs of the individual school, be flexible and individualised as it is made clear in statutory guidance that schools must consider every report of sexually inappropriate/harmful behaviour on a case-by-case basis.
This initial management safety plan will require a prompt review if it has been deemed necessary to involve additional agencies for support. It will also be necessary for a review to take place as soon as possible if school are managing the incident internally.
The purpose of the prompt initial and thereafter regular reviews is to move from a position where external controls are relied upon such as the adults taking all the responsibility to keep everyone safe, to a position where the child/ren use internal controls and strategies they have learnt and take responsibility for keeping everyone safe.
Once management safety plans have achieved their initial purpose and stopped the behaviours, the aim should be to reduce and ultimately cease the plans. The plan should not be overly punitive and needs to consider the parents/carers role in assisting with the plan.

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What incident, information, disclosure or allegation triggered this risk management safety plan?

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

Pupil Name:	DOB and age:	Gender:
Current Attendance %:		
Identified SEND/EHCP		
EHA/CIN/CP		
Alternative Provision/Managed Move - share what is relevant proportionate and necessary for the individual pupil (being mindful of GDPR for involved pupils that are not being supported elsewhere)		
Lead Professional: (if other involved services)		

Describe the identified risk **as factually as possible**. Bullet points often make this process clearer. Using full names state who was involved, where, when it happened, who observed and details of what happened. Remember to include the child/young person's voice including communication methods for non-verbal or those pupils with communication difficulties (consideration needs to be given to how hard this may be for the 'victim' to share, so time, location and space needs to be given over and allow them to be supported by someone they feel comfortable with) and to 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?

Is the pupil subject to:	Yes (if so, outline briefly why) / No
Early Help	
CIN	
CP	
PSP	

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?	
Is there a crime number and/or police reference numbers? If so, has this been noted/referenced on your logging concern system for each pupil involved?	

Has the child to whom this risk management safety plan 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?	
If suspension is used as a sanction, please specify how education will be provided, by who and for how long it is estimated to continue)	

Risk categories to consider

Please note that this risk management safety plan is designed as a template and should be adapted to reflect the needs of the individual school and be individualised on a case-by-case basis 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 management safety plan 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.

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school or college premises and school

or college transport, should be considered immediately."

(Keeping Children Safe in Education, Part 5, 2025)

	Initial risk checklist	YES	NO	RISK IDENTIFIED? If so transfer to Risk Management Safety 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 should they need to leave the classroom unaccompanied? (e.g., to take the register to the office)			
6	Are there periods during the day during which children may be unsupervised in the classroom?			
B.	**Toilets and cloakrooms**			
1	Whilst visiting the toilet/cloakrooms are pupils out of sight of staff?			
2	Can you manage the use of the toilets/cloakrooms so that only one child uses them at a time?			
3	Are staff allocated to monitor toilets/cloakrooms in a discrete and unobtrusive manner?			
4	Are the toilets/cloakrooms unisex?			
5	Are the toilets/cloakrooms used by children of different ages?			
6	Does the location of the toilets/cloakrooms cause a problem?			
C.	**Corridors, walkways**			
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?			
5	Have 'safe spaces' been identified for both the 'victim' (s) and 'perpetrator' (s) if required?			
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 Safety Plan
G.	**Before/after 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?			
4	Could late collection of a child be an issue?			
5	Are there considerations given if the children attend before/after school provisions?			
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?			
J.	**Outside School Hours/Special Events** (Consider adding a specific section to the risk management safety plan 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, sport's days?			
4.	Are there any residential trips planned? *If so, a separate risk management safety plan is recommended.*			
5.	Is there a risk in the local community (e.g., local park if so should this be a consideration and what can parents/carers contribute			

	to ensure the safety of all children?)			

Preventative Education Through PSHE Teaching

		YES	NO	
K	**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 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 Safety Plan
L	**Staff**			
1	Have all staff, including volunteers and Governors, read Part 1 and Annex B of Keeping Children Safe in Education 2025 and are they aware of their safeguarding responsibilities?			
2	Are all staff (including volunteers, supply staff) aware that child-on-child abuse forms part of the school's safeguarding response?			
3	Have all staff (including volunteers, supply staff) 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/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 with information that is relevant, necessary and proportionate to keep all children safe?			

Childs voice/responses - alleged victim - things to note and consider.

Response of the child: for example, did they engage freely? Were they uncomfortable? Were they anxious or fearful? Were they able to share if there had been a level of coercion and/or an imbalance of power?

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?

<u>Childs voice/responses - alleged perpetrator - things to note and consider.</u>

Response of the child when challenged about the behaviour: (for example, were they defensive, denying, aggressive, angry, passive, embarrassed, regretful, accepting responsibility?)

What was attempted to address the behaviour and what was the child's response to that? For example, could the child be easily focused on another task, or were they difficult to distract and kept returning to the behaviour. Did they respond to the boundaries that were set?

Risk Management Safety Plan

Identified Risk	Existing preventative and protective measures	Action: additional measures required	Who is responsible? (Details of agencies supporting)	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):
Date shared with parent(s)/ carer(s):
(Record names)

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):
Date shared with parent(s)/carer(s):
(Record name)