



Ramsden Hall Academy

HARMFUL SEXUAL BEHAVIOUR POLICY

Ramsden Hall Academy

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Policy Owner/Author	DSL Danni Rose
Approved by	Governing Body
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Safeguarding Governor	Jo Oldham

Related policies: Child Protection and Safeguarding; Behaviour; Anti-Bullying; RSHE/RSE; Online Safety; Mobile Phone Use; SEND; Equality and Diversity; Staff Code of Conduct.

1. Purpose

Ramsden Hall Academy is committed to providing a safe, respectful and inclusive environment in which pupils can learn, develop and build healthy relationships. The school recognises that sexual behaviour exists on a developmental continuum, but that some behaviour may be inappropriate, harmful, abusive or potentially criminal.

This policy provides a consistent framework for preventing, identifying, assessing and responding to harmful sexual behaviour (HSB), sexual harassment and violence, sexualised bullying and language, online sexual abuse/exploitation, and the creation, requesting or sharing of nude or semi-nude images.

The policy reflects the school's specialist context: boys aged 10–16 with EHCPs for SEMH needs, with a significant proportion also having ADHD, autism and/or other neurodevelopmental needs. The school therefore uses a safeguarding-led, trauma-informed, developmentally appropriate and neurodiversity-informed approach.

The two aims are to protect children from harm and to support pupils displaying harmful behaviour to understand its impact, change behaviour and develop safer relationships.

This policy should be read with KCSIE 2026, Working Together to Safeguard Children 2026, local safeguarding procedures and related school policies.

2. Scope

This policy applies to all pupils, staff, supply staff, volunteers, governors, contractors, residential staff and relevant visitors. It covers behaviour on or outside school where it affects pupil safety or wellbeing, including:

- school and residential premises; lessons and unstructured time; transport; educational visits and off-site activities; online spaces, social media, messaging, gaming, video calls and group chats.

Incidents may involve pupils from other schools/settings. Safeguarding information will be shared with relevant agencies or schools where necessary.

3. Principles

- Sexual harassment and sexual violence are never acceptable and will not be dismissed as “banter”, “just a joke”, “boys being boys” or “part of growing up”.
- All reports will be taken seriously and assessed promptly.
- The school will safeguard both pupils who have experienced harm and pupils displaying harmful behaviour.
- Assessment will consider age, development, SEND, communication, vulnerability, power imbalance, consent, coercion and context.
- Possible underlying abuse, trauma, exploitation, grooming or inappropriate exposure will be considered.
- Appropriate referrals to Children’s Social Care and/or Police will be made where thresholds are met.
- Safeguarding decisions, including decisions not to refer, will be recorded with a clear rationale.
- Prevention, education, targeted intervention and ongoing monitoring will be used alongside behaviour sanctions where appropriate.

4. Definitions

4.1 Harmful Sexual Behaviour

HSB is sexual behaviour expressed by children or young people which is developmentally inappropriate and/or harmful or potentially harmful to themselves or others.

- sexualised comments, jokes or name-calling; sexual harassment or bullying; unwanted touching or interference with clothing; exposure; sexual acts involving another child; coercion or pressure; filming or sharing sexual activity/material; requesting or sending sexual images; sexualised video-call behaviour; sexual threats, intimidation, exploitation or sexually motivated violence.

HSB may occur between two or more children, within peer groups or from a group towards an individual.

4.2 Sexual Harassment

Unwanted conduct of a sexual nature that may violate dignity or create an intimidating, hostile, degrading, humiliating or offensive environment. Examples include sexual comments/jokes, name-calling, body comments, rumours, unwanted sexual messages or touching, sexualised drawings/material and online harassment.

4.3 Sexual Violence

Behaviour that may amount to a criminal sexual offence, including rape, assault by penetration, sexual assault and causing another person to engage in sexual activity without consent. Such reports are safeguarding concerns and will be referred in line with statutory and local procedures.

4.4 Consent

Consent means freely agreeing to a particular activity. It must be voluntary, can be withdrawn at any time, and does not transfer from one activity to another. Pressure, threats or coercion are not consent; silence does not necessarily mean consent. Children must have the capacity and freedom to choose. Children under 13 cannot legally consent to sexual activity.

4.5 Online HSB

Online HSB includes sexualised behaviour through social media, messaging, video calls, gaming, livestreams, image-sharing, group chats and AI/digital tools. It includes creating, requesting, possessing or sharing nude/semi-nude images or sexually explicit material.

5. Roles and Responsibilities

Governing Body

- Ensure an effective HSB policy and regular review; challenge leaders on safeguarding effectiveness; ensure arrangements reflect statutory guidance and appropriate training is provided.

Headteacher

- Ensure implementation; support the DSL with complex incidents; ensure safeguarding and disciplinary responses are appropriate and concerns are escalated.

DSL

- Oversee HSB concerns; assess risk and referral thresholds; liaise with Police/Children's Social Care; coordinate support and intervention; oversee safety plans and records; identify

patterns; ensure staff training; review intervention effectiveness and record decision-making.

Deputy DSLs

- Support the DSL; respond when required; undertake delegated assessments; maintain records and support pupils/staff following incidents.

All staff

- Remain vigilant; maintain professional curiosity; take concerns seriously; challenge sexualised and misogynistic language; report immediately; record factually; do not investigate; maintain confidentiality on a need-to-know basis.

Residential staff

- Supervise appropriately; identify and report sexualised behaviour; monitor bedroom, bathroom and communal-area risks; follow risk assessments; escalate concerns immediately to the DSL/on-call safeguarding lead.

6. Prevention

Prevention is delivered through RSHE/RSE, PSHE, pastoral programmes, individual intervention and targeted work. Key themes include healthy relationships, respect, boundaries, consent, appropriate touch, puberty and sexual development, pornography, online relationships and image sharing, exploitation, coercion, harassment, misogyny, healthy masculinity, respectful communication and help-seeking.

For pupils with SEND, teaching will be adapted through explicit language, visual resources, repetition, social stories, modelling, concrete examples, individualised teaching and checking understanding.

Sanctions alone are not sufficient: pupils must be taught what appropriate behaviour looks like and supported to practise safer behaviours.

7. Identification

Staff should alert the DSL to sexualised comments/jokes, bullying, inappropriate touching or exposure, clothing interference, sexualised messages/drawings, online sexual communication, image requests/sharing, sexual activity, coercion, threats, significant behavioural change or sexual knowledge/behaviour substantially outside developmental expectations.

Consider associated safeguarding indicators including abuse, trauma, exploitation, grooming, pornography exposure, online grooming, domestic abuse, peer pressure, unhealthy relationships, CSE/CCE and misogynistic or sexually aggressive attitudes. The absence of previous reports does not mean HSB is not occurring.

8. Brook Sexual Behaviours Traffic Light Framework

Where staff are trained and authorised, the school will use the Brook framework to support assessment. It does not replace professional judgement, statutory thresholds, safeguarding procedures or referrals.

- **GREEN** – Generally spontaneous, curious, mutual, consensual and developmentally appropriate; easily redirected and between children with broadly equal age, ability and power. Response: education, boundaries and monitoring.
- **ORANGE** – Cause for concern due to persistence, intensity, frequency, duration, developmental inappropriateness, inequality or risk to health/safety. Response: DSL

assessment, targeted education/support, monitoring and consideration of further safeguarding action.

- RED – Harmful behaviour may be coercive, forceful, threatening, degrading, manipulative, secretive, aggressive, intrusive, abusive, significantly developmentally inappropriate or associated with significant power imbalance. Requires immediate safeguarding consideration and may require referral to Children's Social Care and/or Police.

Brook's current framework also includes digital sexual behaviour guidance.

9. Response to a Disclosure

1. Remain calm and listen.
2. Take the pupil seriously and reassure them that they have done the right thing.
3. Use open questions only where necessary to clarify immediate safeguarding concerns; do not lead.
4. Explain that information may need to be shared to keep people safe.
5. Report immediately to the DSL/deputy DSL.
6. Make a factual record promptly, using the pupil's own words wherever possible.

Staff must not investigate, interview witnesses, confront an alleged perpetrator, promise confidentiality, mediate, ask pupils to repeat accounts unnecessarily, or encourage discussion with peers.

10. DSL Decision-Making

The DSL will consider:

- Behaviour: what happened; verbal/physical/online nature; sexual contact; images/video; coercion.
- Children: age, developmental stage, SEND, communication, vulnerability and power imbalance.
- Consent: whether participation was voluntary and whether pressure, coercion, manipulation, threats or bribery were present.
- Pattern: isolated or repeated; escalation; possible additional victims.
- Context: location, online activity, pornography, exploitation, peer group and misogyny.
- Impact: harm caused, whether the pupil feels unsafe and whether risk remains.

The rationale for significant decisions, including decisions not to refer externally, will be recorded.

11. Risk Assessment

Following sexual violence, and where appropriate following HSB or sexual harassment, the DSL will undertake an immediate risk assessment.

- Pupil affected: immediate safety, wellbeing, attendance, learning, transport, online contact, contact with the alleged perpetrator and support.
- Pupil displaying HSB: risk to others, vulnerabilities, previous behaviour, safeguarding concerns, intervention needs and access to potential victims.
- Other pupils: possible additional victims, witnesses, peer dynamics and wider cultural concerns.
- Environment: location, supervision, toilets/changing areas, residential accommodation, transport and unstructured/online environments.

Risk assessments will be reviewed following new information, further incidents, placement/contact changes, Police/Social Care advice or completion of interventions.

12. Police and Children's Social Care

The DSL will consider referral where a child has suffered or is likely to suffer significant harm; experienced sexual violence; been subjected to coercive/abusive sexual behaviour; is at risk of exploitation or grooming; has been involved in serious or persistent HSB; has been forced, threatened or manipulated into sexual activity; has had sexual images created/requested/shared in circumstances giving rise to safeguarding concerns; or presents significant/escalating risk to others.

Immediate risk of significant harm requires emergency safeguarding action. Where rape, assault by penetration or sexual assault is reported, Police referral will be considered in accordance with KCSIE and local procedures.

The school will not determine criminal liability. Its role is to safeguard, record accurately and refer appropriately. A decision not to refer must be supported by professional judgement and a clear rationale. Safeguarding continues while external enquiries are ongoing.

13. Online HSB and Nude/Semi-Nude Images

Concerns may involve sexual messages, image requests/creation/sharing, pornography, filming sexual acts, threats to share images, coercion, grooming, AI-generated sexual images and sexualised group chats.

If a nude or semi-nude image of a child is involved, staff must not forward, save unnecessarily, screenshot, circulate or ask pupils to send the image to staff. Seek immediate DSL advice and follow safeguarding and online-safety procedures.

The DSL will consider who created/requested/received the image, whether it was shared and consensual, coercion, adult involvement, exploitation, continued circulation and risk to other pupils.

14. SEND, Autism, ADHD and SEMH

The school recognises that pupils may have difficulties with social communication, regulation, impulse control, boundaries, social cues, relationships, consent, risk recognition and disclosure. These factors will inform assessment but will not automatically explain, excuse or minimise harmful behaviour.

The school will distinguish between understanding why behaviour occurred and accepting behaviour that caused harm. Intervention may include explicit boundary/consent teaching, social communication work, visual resources, social stories, modelling, regulation strategies, individualised RSE, therapeutic support, parental support and multi-agency intervention.

Sexualised behaviour may also indicate abuse, exploitation, trauma or inappropriate exposure and will be considered accordingly.

15. Residential and Boarding Provision

Residential boarding is accessed by some pupils as part of the school's reward and enrichment offer; not all pupils board.

Where a pupil is involved in, or subject to an allegation concerning, HSB, sexual harassment or sexual violence, the school will consider whether continued boarding is safe and appropriate. Where the DSL or senior leadership team considers that a pupil may present a risk to others, the pupil may be temporarily stood down from boarding while information is gathered, safeguarding enquiries undertaken and/or risk assessment completed.

Standing down is a safeguarding measure, not necessarily a disciplinary sanction or finding of fact. Decisions will be proportionate, based on available information and reviewed as information develops.

Return to boarding may take account of the nature and seriousness of the concern, age/development, vulnerability or power imbalance, risk to others, SEND/individual needs, previous concerns, ongoing contact, safeguarding assessment/investigation, agency advice and whether effective safeguards/supervision can be implemented.

Where appropriate, an individual risk assessment and boarding safety plan will be completed before return. Residential staff will receive relevant information on a need-to-know basis. Reinstatement will be decided by the appropriate senior leader in consultation with the DSL and, where relevant, external agencies. Boarding arrangements may be modified or withdrawn if risk changes. The safety and welfare of all pupils remain the priority.

16. Support for Pupils Who Have Experienced Harm

Support may include a trusted adult, pastoral/counselling or therapeutic support, individual safety planning, timetable/environment adaptations, attendance support, specialist external services and welfare checks. Pupil wishes and feelings will be considered wherever possible, while recognising that safeguarding duties may require information sharing or protective action.

17. Support for Pupils Displaying HSB

The school will consider whether pupils displaying HSB may themselves have experienced abuse, neglect, trauma, exploitation, grooming, inappropriate sexual experiences, pornography exposure, domestic abuse or unhealthy relationships.

Support may include targeted HSB intervention, consent and healthy-relationship work, emotional regulation, social communication, specialist HSB services, therapeutic intervention, Family Help/Early Help, Social Care involvement and parental support.

18. Behaviour, Sanctions and Restorative Approaches

Safeguarding and behaviour procedures operate together. A disciplinary consequence may be appropriate, but a sanction alone is not a sufficient response to HSB.

The school will consider what happened, who was harmed, why it may have happened, remaining risk, what the pupil needs to understand, support required and how recurrence will be prevented.

Restorative approaches may only be used where safe, appropriate and agreed by the DSL. A pupil who has experienced harm must never be required to meet, forgive, mediate, accept responsibility for, or reconcile with the pupil who caused harm.

19. Parents and Carers

Parents/carers will normally be informed when their child is involved in an HSB concern. Information may cover safeguarding actions, support, expectations, online safety, supervision and intervention.

Information may be withheld or delayed where necessary to protect a child, prevent further harm, or avoid compromising a Police investigation or Children's Social Care assessment.

20. Recording

All HSB concerns will be recorded on SLEUTH/MY CONCERN. Records should include the date/time, location, pupils involved, reported/observed information, child's words where possible, witnesses, immediate actions, DSL assessment, Brook assessment where

appropriate, risk assessment, parent/carer contact, referrals/advice, support/intervention, outcome and rationale for significant decisions.

Records must distinguish fact/observation, attributed information and professional judgement. Where no external referral is made, record the threshold considered, information relied upon and why it was not met.

21. Monitoring and Pattern Analysis

The DSL will monitor incidents for repeat behaviour/victims, escalation, common locations/times, online trends, peer groups, misogyny, pornography-related concerns and exploitation indicators. Apparently separate low-level incidents should not automatically be viewed in isolation where repetition or escalation indicates a wider pattern.

22. Staff Training

Safeguarding training will include child-on-child abuse, HSB, sexual harassment/violence, online sexual abuse, nude/semi-nude images, consent, pornography, exploitation, misogyny, disclosure handling, SEND vulnerabilities and trauma-informed responses. DSLs/deputies will maintain knowledge of HSB and local referral pathways. Staff using Brook must complete the required training.

23. Staff Conduct

Staff will model the school's values: We are respectful. We are resilient. We reflect. We repair.

- Challenge sexualised and misogynistic language; maintain professional boundaries; avoid inappropriate conversations with pupils; report concerns about colleagues under safeguarding/low-level concerns procedures; do not normalise sexualised behaviour.

24. Review and Quality Assurance

The DSL will review this policy annually or sooner following legislative/KCSIE/local-procedure changes, emerging risks or incidents indicating a need for development. Safeguarding data will be used to evaluate frequency and nature of incidents, repeat behaviour, intervention effectiveness, pupil voice, staff confidence, parental feedback and multi-agency outcomes. Governors will receive appropriate assurance on HSB trends and response effectiveness.

Appendix 1 – Staff Quick Response Guide

LISTEN – Remain calm and take the pupil seriously.

REASSURE – “Thank you for telling me.”

DO NOT INVESTIGATE – Do not interview witnesses or confront another pupil.

CLARIFY ONLY WHAT IS NECESSARY – Use open questions only for immediate safeguarding concerns.

REPORT – Immediately inform the DSL/deputy DSL.

RECORD – Record the pupil’s words accurately and factually.

Do not promise secrecy, forward/save sexual images, ask pupils to send images, or discuss the incident with other pupils.

DSL assessment: Age → Development → SEND → Communication → Power → Consent → Coercion → Pattern → Impact → Online factors → Exploitation/abuse

Appendix 2 – DSL Decision-Making Framework

Concern received → Immediate danger/significant harm? → Emergency safeguarding action and Police/999 and/or Children’s Social Care as required → Safety plan.

If no immediate danger: assess what happened (language, touching, exposure, sexual activity, images/video, online behaviour, coercion/threats), then consider age, development, SEND, communication, power, consent, coercion, frequency, persistence, impact, previous incidents, exploitation, pornography and online context.

Use Brook where trained/authorised:

- GREEN: education → boundaries → monitor → record appropriately.
- ORANGE: DSL assessment → targeted intervention → parent/carer involvement → monitor → consider advice/referral.
- RED: immediate safeguarding → risk assessment → Children’s Social Care/Police consideration → specialist intervention → ongoing review.

The Brook category does not determine statutory referral thresholds.

Appendix 3 – HSB Risk Assessment

Pupil affected: _____ Pupil displaying behaviour: _____

Date: _____ DSL: _____

- Nature: what happened, when/where, who was present, online involvement, physical contact, images/video.
- Vulnerability: age/development, SEND, communication, trauma/abuse, exploitation and online vulnerability.
- Power: age, size, development, social status, communication, ability and influence/control.
- Consent/coercion: voluntary participation, pressure, threats, manipulation, bribery or deception.
- Ongoing risk: continuing contact, additional victims, escalation, online or residential contact.

Protective actions:

Risk	Action	Responsible person / review date

External agency involvement: Children's Social Care: Yes / No / Advice sought Police: Yes / No / Advice sought

Other agencies: _____

DSL rationale:

Review date: _____

Appendix 4 – SLEUTH/MY CONCERN Closure Checklist

- ☐ Initial concern/disclosure and child's words where possible
- ☐ Staff actions and DSL assessment
- ☐ Brook assessment and risk assessment where relevant
- ☐ Parent/carer contact where relevant
- ☐ Police and Children's Social Care referral/decision
- ☐ Advice, support and intervention
- ☐ Outcome and rationale for closure

Closure should answer: What happened? What action was taken? What was the safeguarding assessment? What support was provided? Which agencies were involved? What is the current level of risk? Why is the concern being closed? What monitoring/support remains?

Appendix 5 – Indicators Requiring Further Safeguarding Assessment

- significant behavioural change; sexual knowledge beyond developmental expectations; fear of a person; secrecy; unexplained injuries; sexualised drawings/writing; adult/copied sexual language; pornography use; contact with unknown adults online; unexplained gifts/money/possessions; missing episodes; exploitation indicators; self-harm/emotional distress; threats/coercion; repeated or escalating sexualised behaviour; misogynistic or sexually aggressive attitudes.

Appendix 6 – Key Guidance

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Local Safeguarding Children Partnership procedures
- Sexual Offences Act 2003
- Children Act 1989 and Children Act 2004
- Equality Act 2010
- Education Act 2002
- DfE guidance on sharing nudes and semi-nudes
- DfE statutory RSHE guidance
- Brook Sexual Behaviours Traffic Light Tool
- Relevant safeguarding and online safety guidance

KCSIE 2026 comes into force on 1 September 2026. Brook's Traffic Light framework was updated in April 2026 and includes broader digital sexual behaviour guidance.

Policy Statement

Ramsden Hall Academy is committed to a culture in which sexual harassment, sexual violence and harmful sexual behaviour are never acceptable. Our approach is underpinned by our four values: We are respectful. We are resilient. We reflect. We repair. We will protect children from harm, listen to those affected, maintain clear boundaries and support pupils to understand the impact of their behaviour and develop safer, healthier relationships. Safeguarding remains the priority in every decision.