Upton-by-Chester High School

SEXUAL VIOLENCE, SEXUAL HARASSMENT AND HARMFUL SEXUAL BEHAVIOUR POLICY 2026-27

Policy Link	
SLT	Mr J Keegan
Governor	Mrs R Bryson
Statutory	Yes

To	Date
Committee	Pastoral October 2026
Full Governing Body	
Next Review	October 2027
Make available on:	**Yes/ No**
School website	Yes
Staff shared area	Yes

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1. RATIONALE

Upton-by-Chester High School is committed to providing a safe and respectful environment where the whole community is able to learn and thrive free from sexual violence, sexual harassment and harmful sexual behaviour (HSB). The school takes all reports and concerns seriously and will respond sensitively, effectively and in a timely manner.

We are clear that HSB, sexual harassment and sexual violence are never acceptable and will not be tolerated. They will never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Staff will challenge behaviour and language that could normalise harassment, misogyny, sexual violence or abuse.

All staff will maintain an attitude of “it could happen here”. The absence of reports does not mean that HSB, sexual harassment or sexual violence is not occurring; it may mean that it is not being reported. Staff will act on signs and concerns as well as direct disclosures, including incidents occurring outside school and/or online.

This policy should be read alongside the school Safeguarding and Child Protection Policy, Behaviour Policy, Anti-Bullying Policy, Online Safety arrangements and Relationships, Sex and Health Education (RSHE) Policy. It reflects Keeping Children Safe in Education 2026 (KCSIE 2026), Working Together to Safeguard Children 2026, the revised statutory RSHE guidance in force from 1 September 2026, and UKCIS advice on sharing nudes and semi-nudes.

2. DEFINITIONS AND LEGAL FRAMEWORK

Harmful sexual behaviour, sexual harassment and sexual violence

HSB can occur between two or more children of any age and sex. It can involve an individual child or a group of children and can occur online, face-to-face, or both. HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It should always be considered within a child protection context.

Children’s sexual behaviour exists on a continuum from developmentally expected behaviour to inappropriate, problematic, abusive or violent behaviour. When assessing behaviour, staff will consider age and developmental stage, power imbalance, coercion, exploitation, vulnerability, disability, the context of the behaviour and whether it forms part of a pattern.

Early identification and intervention are important. Inappropriate or misogynistic behaviour can escalate if it is not challenged. Children who display HSB may themselves have experienced abuse, trauma or other adversity and may also require safeguarding and therapeutic support.

Sexual violence

For the purposes of this policy, sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent.

Sexual harassment

Sexual harassment means unwanted conduct of a sexual nature. It can occur online or offline, inside or outside school, and may violate a child’s dignity, make them feel intimidated, degraded or humiliated, or create a hostile, offensive or sexualised environment.

- sexual comments, sexual stories, lewd remarks, sexualised comments about clothing or appearance, or sexualised names
- sexual “jokes”, taunting or sexualised bullying
- deliberately brushing against someone, interfering with clothing, grabbing, pulling down clothing, flicking bras or lifting skirts
- displaying sexual pictures, photographs or drawings
- upskirting

- consensual or non-consensual making or sharing of nudes or semi-nudes, including digitally manipulated or AI-generated images
- sharing unwanted explicit content, sexualised online bullying, unwanted sexual comments/messages, sexual exploitation, coercion or threats online
- coercing another person to share images or perform sexual acts online

Sexual harassment should be considered in broad terms. If left unchallenged, it can create a culture that normalises inappropriate behaviour and increases the risk of sexual violence.

Consent

Consent is about having the freedom and capacity to choose. Consent can be withdrawn at any time and must apply to each sexual activity. A child under 13 can never consent to sexual activity. The age of consent is 16. Sexual intercourse without consent is rape.

Special Educational Needs and Disabilities (SEND)

Children with disabilities are at increased risk of abuse. Staff will remain alert to additional barriers to recognising and reporting abuse, including communication difficulties, assumptions that behaviour or injury relates to disability, and the possibility that bullying or harassment may have a disproportionate impact without obvious outward signs.

Terminology

This policy uses the terms “victim” and “alleged perpetrator” where this aids clarity. Not every child who has experienced abuse identifies with the term victim. Staff will use language the child is comfortable with wherever possible and will think carefully about terminology, particularly when speaking in front of children. Use of the term alleged perpetrator does not imply guilt.

Legal and statutory framework

This policy has regard to the following legislation and guidance:

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance (revised guidance in force from 1 September 2026)
- Equality Act 2010
- Sexual Offences Act 2003
- Voyeurism (Offences) Act 2019
- Protection of Children Act 1978
- Children Act 1989 and Children Act 2004
- Children and Social Work Act 2017
- Relationships Education, Relationships and Sex Education and Health Education (England) Regulations 2019
- UKCIS: Sharing nudes and semi-nudes - advice for education settings working with children and young people

3. RELATIONSHIPS AND SEX EDUCATION

Prevention

Preventative education is a key part of the school’s safeguarding approach. Through a whole-school approach and the RSHE/PSHE curriculum, learners will be taught how to recognise healthy and unhealthy relationships, consent, boundaries, respectful behaviour, sexual harassment and sexual violence, online safety, pornography, sharing nudes and semi-nudes, image-based abuse, AI-generated sexual imagery and how to seek help.

The curriculum will be age-appropriate, developmentally appropriate and responsive to emerging risks. It will address sexism and misogyny, challenge harmful stereotypes and help learners understand that sexual harassment and sexual violence are never acceptable.

The school's values and standards will be modelled across school life and supported by the Behaviour Policy, Anti-Bullying Policy, safeguarding systems, assemblies, tutor time and pastoral support. See Appendix E for an overview.

4. DISCLOSURES AND SAFEGUARDING RESPONSE

Responding to reports

Reports of HSB, sexual harassment and sexual violence can be complex and may require swift professional decisions. All decisions will be made on a case-by-case basis, led by the DSL or a deputy using professional judgement and supported by Children's Social Care, Police and specialist services as needed.

Children may not make a direct verbal disclosure. Staff must act immediately on signs, indirect reports, overheard information or changes in behaviour that indicate possible harm, rather than waiting for a child to tell them explicitly.

Victims will be reassured that they are being taken seriously, will be supported and kept safe, and will never be made to feel that they are causing a problem or should feel ashamed. Online and off-site abuse will be treated with equal seriousness.

Managing a disclosure

- Listen carefully and calmly. Use the child's own language and avoid judgement.
- Do not promise confidentiality. Explain that information will only be shared with people who need to know in order to keep children safe.
- Ask only open questions needed to clarify what has happened; do not conduct an investigative interview.
- Make a clear written record of what the child says, without interpretation or personal opinion.
- Inform the DSL or deputy as soon as practically possible.
- Consider immediate safety and medical needs and preserve potential evidence.

Online incidents and nudes/semi-nudes

All incidents involving the making or sharing of nudes or semi-nudes involving children under 18 - whether consensual, non-consensual, digitally manipulated or AI-generated - will be treated as safeguarding concerns and referred to the DSL as soon as possible. The response will be proportionate and will consider age, development, coercion, exploitation, vulnerability and the circumstances of the children involved.

Staff must not view, copy, print, share, store or forward illegal images of a child. Where viewing is unavoidable, this will only occur in accordance with UKCIS guidance and under DSL direction. In some cases it may be appropriate to secure a device and seek Police advice to preserve evidence.

The school will consider risks including non-consensual sharing, account hacking, AI-generated or manipulated images, financially motivated sexual extortion ("sextortion"), grooming by adults posing as children, and the possibility that content may spread rapidly across platforms.

Confidentiality and anonymity

Staff will never promise confidentiality. Information will be shared on a need-to-know basis and in accordance with safeguarding and data protection requirements. Where a child asks that information is not shared, the DSL will balance their wishes with the duty to protect them and other children. If a referral is made against the child's wishes, the reasons will normally be explained and appropriate support offered.

Where criminal proceedings are involved, the school will be mindful of legal anonymity and witness-support requirements and will take reasonable steps to protect the anonymity of all children involved, including managing the risks posed by social media and rumours.

Risk and needs assessment

Following a report of sexual violence, the DSL or deputy will carry out an immediate risk and needs assessment. Following a report of sexual harassment, the need for an assessment will be considered on a case-by-case basis.

- the victim's safety and support needs
- potential other victims
- the alleged perpetrator(s) and their support/safeguarding needs
- the wider school community, including learners and staff
- the location and time of the incident and any environmental measures required
- shared classes, social times, transport and journeys to/from school
- online contact, social media and risks of repeated or wider sharing
- any power imbalance, coercion, exploitation, SEND or other vulnerability
- the wishes and feelings of the child, balanced with the school's safeguarding duties

Risk and needs assessments will be recorded on CPOMS, reviewed regularly and used to inform ongoing safeguarding decisions. Records will include the concern, actions taken, decisions made, the rationale for those decisions and the outcome.

School fact-finding and external investigations

The school may need to establish sufficient facts to make safeguarding, support and disciplinary decisions. This is distinct from a Police or Children's Social Care investigation. Where statutory agencies are involved, the DSL will liaise with them about what enquiries the school can appropriately undertake so that the school does not prejudice or contaminate an external investigation.

5. RESPONSES, SUPPORT AND PARTNERSHIPS

Every report will be considered on a case-by-case basis. The DSL or deputy will consider the victim's wishes, the nature of the alleged incident, whether a crime may have been committed, ages and developmental stages, power imbalance, patterns of behaviour, intimate relationship abuse, intrafamilial harm, ongoing risk and wider contextual concerns including child sexual or criminal exploitation.

There are four common response pathways:

1. Manage internally - for some one-off incidents of HSB or sexual harassment, the school may manage the matter through safeguarding, behaviour and pastoral systems without statutory intervention.
2. Universal services and community-based Early Help - where children do not require statutory intervention but would benefit from coordinated support.
3. Referral to local authority Children's Social Care - where a child has been harmed, is at risk of harm or is in immediate danger, in line with local thresholds and statutory guidance.
4. Reporting to the Police - where a report of rape, assault by penetration or sexual assault is made, the starting principle is that it should be reported to the Police. Police and Children's Social Care referrals will often run in parallel.

The school will not delay immediate safeguarding action while awaiting advice from another agency. Where a referral to Children's Social Care and/or the Police is being made, the DSL will normally consult those agencies about how and when the alleged perpetrator should be informed.

Parents and carers

Parents/carers will normally be informed unless there is a compelling reason not to do so, for example where informing them may place a child at additional risk. Where parents have not been informed, the school will ensure the child is appropriately supported and will work with Children's Social Care or Police as appropriate.

Shared classes and physical separation

For reports of rape or assault by penetration, while the school establishes the facts and liaises with Children's Social Care and Police, the alleged perpetrator(s) should be removed from any shared classes with the victim. The school will also consider reasonable physical separation across the site, before/after school activities and transport where appropriate. These arrangements are safeguarding measures and are not a judgement of guilt.

For other reports of sexual harassment or sexual violence, decisions about shared classes, proximity on site, premises and transport will be considered immediately through the risk and needs assessment, taking account of the victim's wishes, the nature of the allegation and the need to protect all children involved.

6. OUTCOMES AND SUPPORT

The outcome of a Police investigation or criminal proceedings does not determine the school's safeguarding responsibilities. A decision not to prosecute, no further action, or a not-guilty verdict does not necessarily mean that the reported incident did not happen or that the reporting child was untruthful. The school will continue to assess risk and provide proportionate support.

Support will be tailored to the individual and may include pastoral support, trusted-adult arrangements, curriculum or timetable adjustments, safety planning, referrals to specialist services, support for attendance and learning, and work with parents/carers and external agencies. Children alleged to have caused harm may also require safeguarding, therapeutic or behaviour support.

Sanctions will be considered separately from safeguarding support and will be applied in line with the Behaviour Policy and the civil standard of proof (balance of probabilities), taking account of any advice from Police or Children's Social Care and the need not to prejudice criminal proceedings.

7. MONITORING AND REVIEW

Implementation will be monitored by the Headteacher, senior leaders and DSL team. The Governing Body will receive appropriate anonymised information to enable oversight of patterns, responses, safeguarding culture and the effectiveness of preventative education.

The policy will be reviewed at least annually and sooner where there are changes to legislation, KCSIE, RSHE guidance, local safeguarding arrangements or learning from incidents. The DSL will ensure local referral routes and specialist support information remain current.

APPENDIX A: CARD - What Happens Next?

Sexual Violence, Sexual Harassment or Harmful Sexual Behaviour:

What happens next?

We cannot promise you confidentiality. We hope and believe you have shared this with us because you want help.

WE CAN:

Listen to you, take time and move at a pace you are happy with.
Use our knowledge as safeguarding specialists to assess your situation and choose the right next steps.

WE MAY:

Contact other agencies e.g. social care, police.
Investigate further and speak to other students and family members.

FOUR POSSIBLE OUTCOMES:

The school manages this internally to bring about a conclusion that supports you.	The school starts the "Early Help" process. You and your family agree to support and we work on ways to help.
The school contacts Social Care as we feel you are at risk of harm or have been harmed.	The school contacts the police as we believe a crime has been committed.

WHATEVER HAPPENS, WE WILL:

Do an immediate risk assessment to check you are safe
Offer you support and show you others who may be able to help.
Tell you what is happening and why and (if relevant) what we are going to tell others and when.
Take advice from specialists if appropriate.
Advise you on your own possible next steps.

Note: this existing learner-facing card should be used alongside the updated procedures in this policy. Where terminology on the card differs from KCSIE 2026, the main policy takes precedence.

APPENDIX B: Risk and Needs Assessment Template

For: sexual violence; sexual harassment; harmful sexual behaviour; harmful online behaviour with a sexual context; sharing nudes/semi-nudes including AI-generated or manipulated images.

DATE OF ASSESSMENT:

VERSION:

COMPLETED BY:

REVIEWED BY:

LEARNERS NAMED:

STAGE: immediate / investigation / review

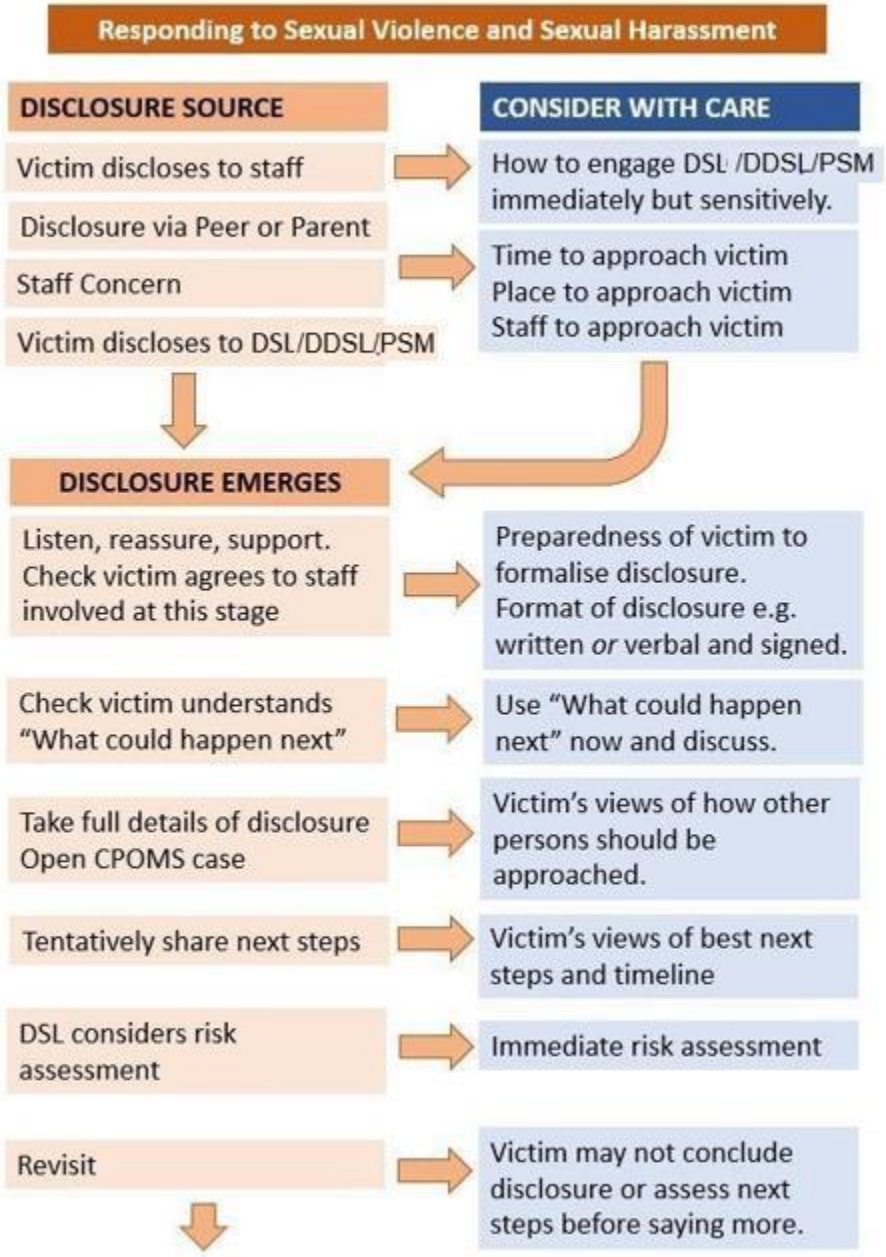
REFERRED TO CHILDREN'S SOCIAL CARE?

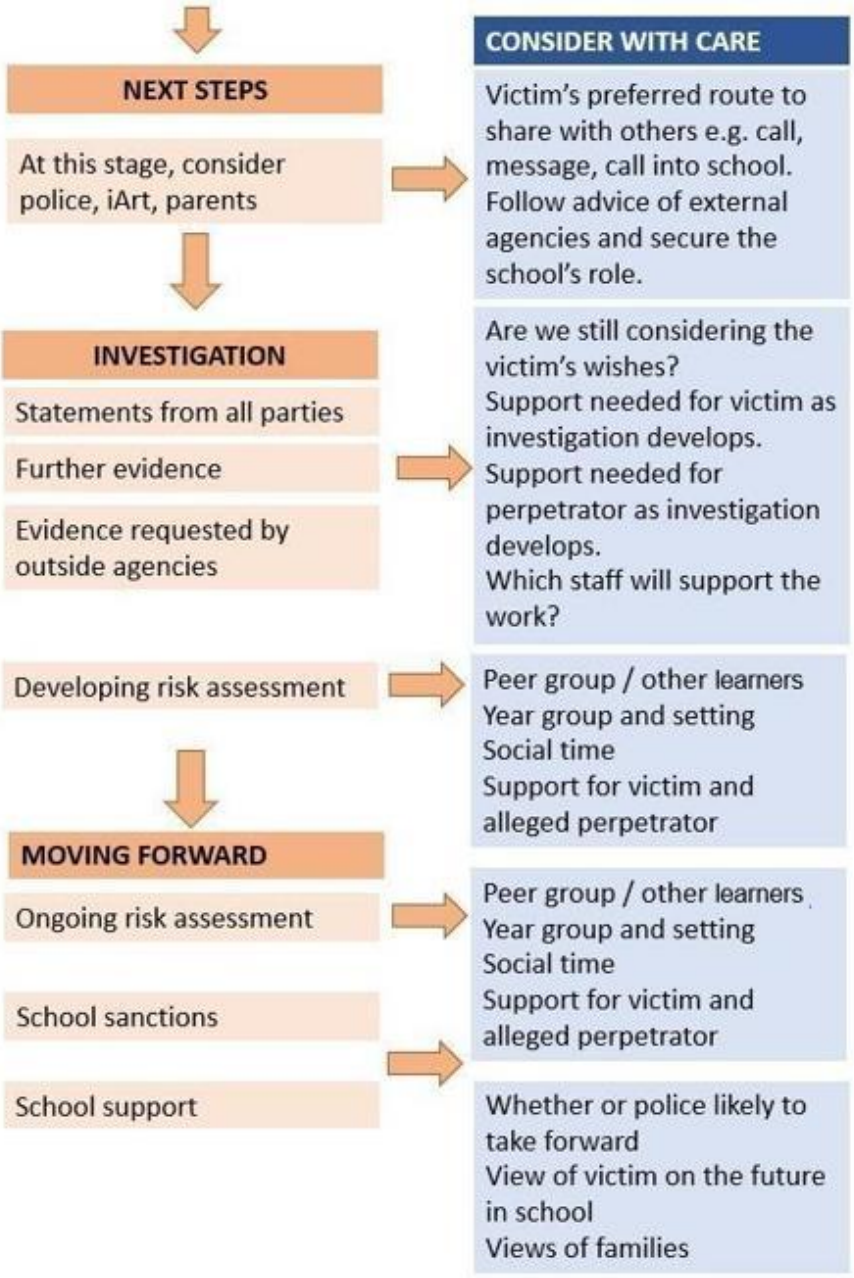
REFERRED TO POLICE?

CONSIDERATION	RISK / NEED	RISK LEVEL	ACTIONS / CONTROLS	REVISED RISK
Nature, location and time of incident				
Victim safety and support needs				
Potential other victims				
Alleged perpetrator safeguarding/support needs				
Shared classes / proximity on site				
Break/lunch/social times				
Journey/transport to and from school				
Online contact/social media/image-sharing risk				
Power imbalance/coercion/exploitation				
SEND or other vulnerability				
Family role and safety planning				
Advice from external agencies				
Staff who need to know / communication plan				
Child's wishes and feelings				
Review date and outcome				

Record all significant actions, discussions, decisions, rationale and outcomes on CPOMS. Review whenever circumstances change and at agreed intervals.

APPENDIX C: Dealing with a Disclosure Checklist





KCSIE 2026 additions: act on indirect signs as well as direct disclosures; use open questions only; record the child's words without interpretation; refer promptly to the DSL; do not view or forward illegal images; and treat online/off-site abuse with equal seriousness.

APPENDIX D: Further Support

- Cheshire West and Chester Children's Social Care / Integrated Access and Referral Team - use current local safeguarding contact details and out-of-hours arrangements.
- Cheshire Police - 101 for non-emergency contact; 999 where there is immediate danger.
- National Crime Agency CEOP Safety Centre - reporting and support for online sexual abuse.
- NSPCC Helpline - professional safeguarding advice.
- Rape Crisis England & Wales and The Survivors Trust - specialist sexual violence support.
- Childline / Internet Watch Foundation Report Remove - support to report and remove nude or sexual images/videos shared online.
- UK Safer Internet Centre Professionals Online Safety Helpline - advice for professionals.
- UKCIS - Sharing nudes and semi-nudes advice for education settings.
- NHS Sexual Assault Referral Centres (SARCs) - medical, practical and emotional support.

Contact details and local referral routes must be checked by the DSL at each annual review and whenever services change.

APPENDIX E: Relationships and Sex Education Overview

The RSHE curriculum will be aligned with the revised statutory guidance in force from 1 September 2026 and will be planned progressively across key stages. Relevant safeguarding content will include:

- healthy, respectful relationships, boundaries and consent
- recognising controlling, coercive, abusive and exploitative behaviour
- sexual harassment, sexual violence and harmful sexual behaviour
- sexism, misogyny, stereotypes and respectful behaviour
- online relationships, pornography and the impact of harmful sexual content
- sharing nudes and semi-nudes, image-based abuse, digitally manipulated and AI-generated sexual imagery
- grooming, sexual exploitation, coercion, blackmail and financially motivated sexual extortion
- how and where to report concerns and access trusted support
- relevant legal provisions, taught in an age-appropriate and factual way

APPENDIX F: Online Sexual Harm - Reference Terms and Response

This appendix replaces the dated 2024 legal/terminology summary. Staff should use current KCSIE and UKCIS guidance rather than relying on historic descriptions of online offences.

- **Sharing nudes and semi-nudes:** Creating, sending or posting nude or semi-nude images, videos or livestreams by people under 18. This includes self-generated, digitally altered and wholly AI-generated images.
- **Non-consensual image sharing:** Sharing private sexual images without consent. It can cause significant harm and may constitute a criminal offence.
- **AI-generated / manipulated sexual imagery:** Sexualised images altered or created using digital tools or artificial intelligence, including “deepfakes” or “deep nudes”. These are safeguarding concerns even where no original nude image existed.
- **Sextortion / financially motivated sexual extortion:** Coercion or blackmail involving sexual images, often with threats to share material unless money, further images or other demands are met.
- **Online sexual harassment:** May include unwanted explicit content, sexualised bullying, unwanted sexual comments/messages, coercion, threats, exploitation or pressure to share images/perform acts online.
- **Adult-involved incidents:** An adult may pose as a child online to groom, sexually abuse or blackmail a child. Apparent child-on-child incidents should therefore be assessed carefully for adult involvement.

Immediate staff response

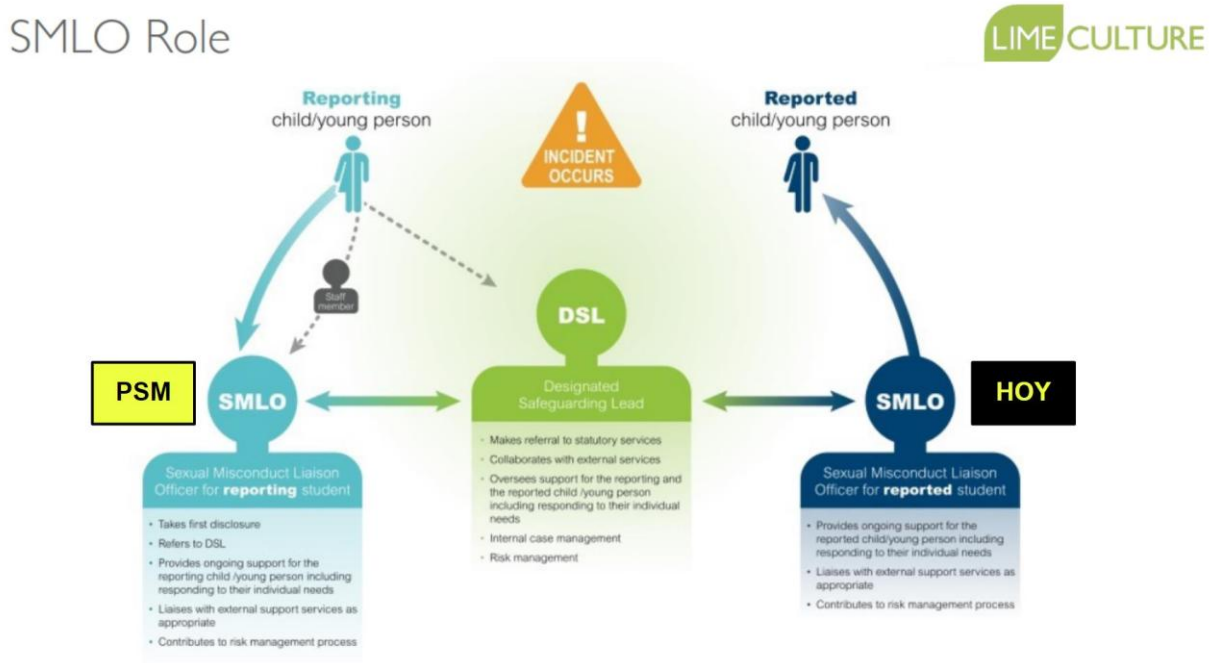
- Refer the incident to the DSL/deputy as soon as possible.
- Do not view, copy, print, share, store or forward illegal images of a child.
- Do not ask a child to send an image to a member of staff or to another device.
- Preserve evidence appropriately; seek Police advice where necessary.
- Assess coercion, exploitation, age/development, vulnerability, adult involvement, wider sharing and immediate safety.
- Use Report Remove/other specialist support where appropriate and support the child and family throughout.

APPENDIX G: Sexual Misconduct Liaison Officer (SMLO) Role Description

The SMLO role provides proactive support and advice to learners who have experienced sexual misconduct, including recent and non-recent sexual violence, sexual harassment or HSB. The SMLO works within the school's safeguarding policies and procedures and in close partnership with the DSL.

The DSL retains overall responsibility for safeguarding decision-making, referrals, statutory-agency liaison and oversight of risk. The SMLO role does not create a parallel safeguarding pathway and all safeguarding concerns must be shared with the DSL/deputy in accordance with school procedures.

- supporting the reporting or reported learner to make informed choices about available options
- contributing to individual risk and needs assessment under DSL oversight
- ensuring learners understand support and reasonable adjustments available in school
- developing and coordinating tailored support plans
- signposting and liaising with specialist community services
- explaining relevant school behaviour and safeguarding procedures
- working with Children's Social Care and Police where directed by the DSL
- maintaining accurate safeguarding records, including actions, decisions, rationale and outcomes
- supporting the identification of patterns, themes and whole-school learning
- taking care not to contaminate evidence and following Police/ABE advice where relevant



POLICY REVIEW NOTE - 2026 UPDATE

This version has been updated from the school's 2024 Sexual Violence, Sexual Harassment and Harmful Sexual Behaviour Policy. Yellow highlighting identifies substantive additions or revisions made to align the policy with current safeguarding expectations.

Key sources checked for this update:

- Department for Education, Keeping Children Safe in Education 2026 (in force from 1 September 2026), particularly Part Five: Child-on-child sexual harassment and sexual violence.
- Department for Education, Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance, revised guidance in force from 1 September 2026.
- UK Council for Internet Safety, Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024).
- Working Together to Safeguard Children 2026 and relevant local safeguarding arrangements.

This school policy should be read alongside the full statutory guidance. It does not replace professional judgement, local safeguarding procedures or advice from Children's Social Care and Police.