



Harmful Sexual Behaviour (HSB) Policy

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Document History

Version	Version Date	Author	Summary of Changes
V1.0	1 st September 2025	Zack Minton Trust Head of Safeguarding	<p>New policy prepared:</p> <p>This policy has been developed using statutory guidance (KCSIE 2025, WTSC 2023, DfE RSHE Guidance) and professional safeguarding expertise. Drafting tools, including AI and model policies, were used to support structure and clarity; however, the final content has been adapted, quality-assured, and authorised by the Trust Head of Safeguarding.</p>

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1. Purpose of the Policy

Vision

At Discovery Trust, safeguarding is the golden thread running through every decision, every interaction, and every setting. We are committed to protecting all pupils from harmful sexual behaviour (HSB) and child-on-child abuse, ensuring that our responses are consistent, trauma-informed, and rooted in dignity and respect.

Fairness, Impartiality, and Bias Prevention

Discovery Trust are committed to handling all safeguarding matters in a fair, impartial, and objective way. We actively work to disrupt unconscious and confirmation bias in decision-making, ensuring every case is judged on its facts. Victims are supported in a way that empowers them without fostering ‘victim think’, and alleged perpetrators are treated proportionately and with dignity. All safeguarding decisions must be recorded with clear rationale, reviewed in DSL supervision, and quality assured through Trust oversight.

Alignment with Strategy

This policy sits within the Discovery Trust Safeguarding Strategy (2025–28) and is aligned with our safeguarding phases:

- **Protect** – prevent HSB through proactive education, culture, and training.
- **React** – respond swiftly, proportionately, and consistently when HSB occurs.
- **Learn** – embed reflection, professional curiosity, and continuous improvement.

Trust Values

Our safeguarding approach reflects our Trust values:

- **Belonging** – every pupil feels safe, included, and supported.
- **Ambition** – we pursue excellence in safeguarding practice across all settings.
- **Equity** – every child receives fair, consistent, and proportionate support.

Minimum Standards

- Every school must have at least two DSLs or Deputy DSLs trained in the Brook Traffic Light Tool, refreshed every two years.
- All colleagues must receive annual safeguarding training on child-on-child abuse and HSB (KCSIE 2025, Part 5).
- All HSB incidents must be logged in CPOMS, categorised correctly, and overseen by the DSL.
- Amber and Red cases must be referred to statutory safeguarding partners within 24 hours.

2. Legislative & Statutory Framework

This policy is written with reference to and in compliance with:

- Keeping Children Safe in Education (KCSIE) 2025 – Part 5: Child-on-Child Sexual Violence and Sexual Harassment
- Working Together to Safeguard Children (2023)
- Relationships, Sex and Health Education (RSHE) statutory guidance (DfE, 2019)
- Children Acts 1989 and 2004
- Sexual Offences Act 2003
- Data Protection Act 2018 and UK GDPR

3. Linked Policies

This policy should be read alongside the following Discovery Trust policies:

- *Safeguarding and Child Protection Policy*, setting out overarching statutory safeguarding responsibilities.
- *RSHE Policy*, outlining how pupils are educated on relationships, sex and health in line with statutory requirements.
- *Anti-Bullying Policy*, complementing this policy in addressing child-on-child harm.
- *Online Safety Policy*, recognising the overlap between harmful sexual behaviours and online risks.

4. Definition of Harmful Sexual Behaviour (HSB)

In line with KCSIE 2025, HSB refers to sexualised behaviours by children and young people that are developmentally inappropriate, harmful, or abusive, whether they occur online or offline, inside or outside school.

Examples of Harmful or Inappropriate Sexual Behaviour

Harassment and behaviours of a sexual nature include but are not limited to:

Behaviours of a Sexual Nature and Sexual Harassment

Behaviours of a sexual nature include any words, gestures, actions, or online communications that are intended to be sexual, or are perceived as sexual by others. These may be verbal, non-verbal, physical, or online, and can occur between pupils of any age.

Sexual harassment refers to unwanted conduct of a sexual nature which has the purpose or effect of violating another person's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment. This may include but is not limited to:

- Sexual comments, jokes, or taunts.
- Non-verbal behaviour such as sexual gestures or staring.
- Physical conduct such as unwanted touching, grabbing, or sexual gestures.
- Online harassment, including unwanted sexualised messages or sharing of sexual images.

Verbal behaviours:

- Sexual comments, sexualised jokes, name-calling or harassment.
- Repeated sexualised talk beyond age-appropriate curiosity.

Physical behaviours:

- Unwanted touching, grabbing, lifting clothing, exposure.
- Sexual assault or attempted assault.

Online behaviours:

- Sharing or requesting nude/semi-nude images.
- “Upskirting” or non-consensual image-taking.
- Coercion, threats, or exploitation through digital platforms.
- Repeated access to or sharing of pornography.

Exploitative behaviours:

- Grooming or coercion of peers.
- Using threats or manipulation to gain sexual activity.

5. HSB Risk Assessment Framework

All HSB incidents will be risk assessed and recorded using:

- The Brook Traffic Light Tool will be used to assess and categorise incidents of HSB across the Trust.
- Every school must ensure that at least two DSLs/Deputy DSLs are trained in the Brook Tool, and that training is refreshed every two years.
- Only Brook-trained DSLs may apply the tool.
- All other colleagues must recognise and report behaviours but must not attempt to categorise them.

Brook assessments must be:

- Logged and evidenced in CPOMS.
- Reviewed during DSL supervision.
- Sampled through Trust safeguarding audits for consistency.

Required responses:

- **Green:** Preventative education, parental engagement, monitoring.
- **Amber:** Safeguarding plan, targeted intervention, parental involvement, close monitoring.
- **Red:** Immediate DSL action, referral to police/social care, multi-agency strategy meeting, protective measures for victim and perpetrator.

6. Protecting Pupils (Preventative Phase)

- Curriculum: Every school must deliver statutory RSE and PSHE content (DfE, 2019) covering consent, boundaries, healthy relationships, respect, and online safety. This is monitored through Trust curriculum reviews.
- Culture: Leaders must ensure an inclusive culture where discriminatory language, harassment, or sexualised behaviours are consistently challenged.
- Colleague Training: All colleagues receive annual safeguarding updates; DSLs complete advanced HSB training, refreshed at least every two years.
- Early Identification: CPOMS data, pupil voice, and safeguarding reviews are used to identify emerging concerns before they escalate.

7. Reacting to HSB (Response Phase)

Initial Response:

- DSL uses Brook Tool immediately. Victim safeguarded first. Parents/carers are informed appropriately.

Escalation:

- **Amber/Red** cases referred to children's social care and police within 24 hours.
- Trust Head of Safeguarding notified for oversight.
- Schools must attend and contribute to multi-agency strategy meetings.
- Perpetrator Support: In line with KCSIE 2025, responses must avoid "zero tolerance" only approaches, instead balancing accountability, safeguarding, and rehabilitation.
- Victim Support: Trauma-informed support, pastoral checks, counselling, and risk-reduction measures in school.

8. Learning from Incidents (Learning Phase)

- School-Level Reviews: Every HSB case undergoes a review within 10 working days of closure.
- Trust Learning Log: DSLs must record key learning points. The Trust Head of Safeguarding collates themes termly.
- Training Updates: CPD is adapted to address emerging risks.
- QA Monitoring: Learning is fed back through the Safeguarding QA Framework and reported to SLT, Advisory Boards, and Trustees.

9. Recording and Reporting HSB Incidents

- School Reviews: Every HSB case must be reviewed within 10 working days of closure.
- Trust Learning Log: DSLs record learning points; the Trust Head of Safeguarding collates themes termly.
- DSL Supervision: HSB cases must be discussed in supervision to ensure consistent practice and support for DSLs.
- Training Updates: CPD is adapted to reflect new or repeated risks.
- QA Monitoring: Safeguarding QA reviews ensure accountability to SLT, Advisory Boards, and Trustees.

10. Contextual Safeguarding

- This policy applies to all Discovery Trust settings, primary, secondary, and special schools (including pupils up to 18+), wrap-around care, and holiday provision.
- HSB may be presented differently in different phases (e.g. sexualised play in EYFS vs harassment in secondary).
- Responses must always be proportionate, safeguarding-led, and adapted for pupils with SEND or additional needs.

11. Support Systems for Pupils and Colleagues

- Victims: Access to pastoral and therapeutic support, safety planning in school and regular well-being checks.
- Children who cause harm: Behaviour plans, mentoring, specialist support, parental engagement, and monitoring to reduce repeat behaviours.
- Colleagues: DSL supervision, access to the Trust Head of Safeguarding, and ongoing CPD.

12. Roles and Responsibilities

- DSLs: Lead assessments, manage CPOMS logging, coordinate multi-agency work, and oversee victim/perpetrator support.
- All Colleagues: Recognise, report, and record HSB concerns without delay.
- Headteachers: Ensure culture, training, and resourcing are in place.
- Trust Head of Safeguarding: Oversight of all HSB cases, DSL supervision, QA reviews, reporting to Trustees.
- Trustees/ABMs: Hold leaders to account for compliance and effectiveness.

13. Governance & Reporting

The Trust Head of Safeguarding will provide reports to the Standards Committee, covering:

- Number and type of HSB cases (anonymised).
- Timeliness of referrals to statutory agencies.
- Key learning themes.
- Evidence of Brook Tool compliance.

This ensures trustees maintain strategic oversight and assurance of effective safeguarding practice.

14. Policy Review and Updates

- Annual Review: Policy reviewed by Trust Head of Safeguarding, DSL network, and approved by Trustees.
- Compliance Checks: QA audits, CPOMS reviews, and DSL supervision ensure consistent practice.
- Feedback: Pupil voice, colleague surveys, and multi-agency feedback inform policy updates.
- Statutory Alignment: Policy updated annually in line with KCSIE, WTSC, and DfE guidance.

