

# Good practice guide: Addressing peer-on-peer sexual harassment and abuse

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Endorsed by



## Introduction

Peer-on-peer sexual harassment in education settings has been discussed, researched, and reported on for decades. However, recent years have witnessed a significant growth in knowledge and awareness around the issue. In Wales, the matter has been prominently highlighted in two Estyn reports, addressing the problem of peer-on-peer harassment within schools (2021), and amongst 16 to 18-year-old learners in further education (2023).

The Senedd's Children, Young People and Education (CYPE) Committee has published a report on peer-on-peer sexual harassment which describes it as 'shockingly commonplace' within secondary schools, 'common' in colleges, and also taking place in primary schools (CYPE, 2022). The report notes that girls, LGBTQ+ learners, and those with other non-normative characteristics are particularly at risk.

The normalisation and under-reporting of peer-on-peer sexual harassment were also key findings in recent research by the NSPCC which found that:

"Gender and sexual violence, both online and offline, is described by young people as commonplace, and all forms of gender and sexual violence, from gender-based insults to sexual assaults, are under-reported or not reported at all.

Young people note how these experiences have become 'normalised' but also describe feeling forced, pressured, traumatised, shamed and distressed about them."

(Renold et al. 2023)

The prevalence of sexual harassment in our places of learning is, sadly, a reflection of broader societal issues, with problems of harassment and abuse also increasingly being highlighted in other places of work and social interaction. EWC registrants have a unique and critical role to play in identifying and addressing peer-on-peer harassment and abuse, through creating safe, inclusive environments, and treating children and young people with respect and empathy.

All children and young people in Wales should feel confident that they are safe from sexual harassment and abuse when they attend school, college, or youth club. Their right to do so is underpinned by Article 19 of the United Nations Convention on the Rights of the Child which states that children have a right to be safe from all forms of physical or mental violence, injury or abuse...including sexual abuse (United Nations, 1989).

This good practice guide, which has been endorsed by Barnardo's, Brook, and the NSPCC, is designed to help you as an Education Workforce Council (EWC) registrant to:

- fulfil the responsibilities that are set out within the EWC's Code of Professional Conduct and Practice
- identify peer-on-peer sexual harassment and other harmful sexual behaviour
- prevent, identify, respond to, and report incidents of peer-on-peer sexual harassment

The document provides links to helpful resources and organisations who may be able to provide more detailed advice on dealing with specific circumstances that you may encounter.

The guide is not intended as a replacement for statutory guidance, training, and professional development around the issues that are covered. It is therefore essential to ensure that you are familiar with your employer's policies on peer-on-peer harassment, as well as other relevant policies such as those relating to harmful sexual behaviour, child sexual exploitation, equality, diversity and inclusion, and bullying.

## The Code of Professional Conduct and Practice

All EWC registrants are subject to the [Code of Professional Conduct and Practice](#) (the Code), which sets out the key principles of good conduct and practice for registrants. This guidance should therefore be read in conjunction with the Code.

The principles and expectations within the Code which are relevant to preventing and responding to incidents of peer-on-peer sexual harassment are:

### Personal and Professional Responsibility

Registrants:

- 1.1 recognise their personal responsibility as a role model and public figure, to uphold public trust and confidence in the education professions, both in and out of the workplace
- 1.2 conduct relationships with learners and young people professionally by:
  - communicating with learners and young people respectfully, in a way which is appropriate for them
- 1.3 engage with learners and young people to encourage confidence, empowerment, educational and personal development
- 1.4 have a duty of care for the safety, physical, social, moral, and educational wellbeing of learners and young people:
  - acting on anything which might put a learner, or young person's safety or welfare at risk
  - reporting...any safeguarding issue, or any other issue, which may potentially harm a learner, or young person's safety or welfare
- 1.6 demonstrate a commitment to equality and diversity

## Identifying peer-on-peer harassment

### What is peer-on-peer sexual harassment?

Within Welsh Government's guidance for education settings on peer sexual abuse, exploitation, and harmful sexual behaviour, peer-on-peer sexual harassment is defined as:

Persistent unwanted conduct of a sexual nature by a child towards another child that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

(Welsh Government 2020)

Within their report on peer-on-peer sexual harassment among secondary school pupils in Wales, Estyn offer a number of specific examples of such behaviour:

- making sexual comments, remarks, and jokes either face-to face or online
- lifting up skirts or taking a picture under a person's clothing without them knowing
- making nasty comments about someone's body, gender, sexuality, or looks to cause them humiliation, distress, or alarm
- image-based abuse, such as sharing a nude/semi-nude photo or video without the consent of the person pictured
- sending unwanted sexual, explicit, or pornographic photographs/videos to someone<sup>1</sup> (Estyn, 2021)

## Online sexual abuse and harassment

Increasingly, peer-on-peer sexual harassment is taking place outside of education settings and is happening online, through digital platforms. Sometimes this takes place as part of a wider pattern of sexual harassment that includes 'in-person' abuse taking place within educational settings. This creates additional difficulty in observing and identifying harmful sexual behaviour.

Examples cited by Welsh Government (2020) of peer-on-peer sexual harassment taking place online can include:

- non-consensual sharing of sexual images and videos
- sexualised online bullying
- unwanted sexual comments and messages (including on social media), coercion, and threats

## How to identify inappropriate sexual behaviour

It is essential to ensure that responsibility for challenging peer-on-peer sexual abuse and harassment should not fall on those who are its victims. It is therefore important to ensure that you develop effective approaches to identify and address harmful sexual behaviour.

The following diagram, based upon the work of Professor Simon Hackett (2010), illustrates a continuum model that outlines the range of sexual behaviours presented by children and young people. Categorising behaviours on a scale that ranges from 'normal' through to 'violent', this should help you to identify which behaviours are potentially harmful to the child or young person displaying the behaviour and others, and to distinguish these from behaviours that represent healthy sexual development.

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<sup>1</sup> It should be noted that whilst the age of consent in the UK is 16, it is an offence to make, distribute, possess, or show any indecent images of anyone aged under 18, even if the content was created with the consent of that young person.

## Continuum of sexual behaviours presented by children and young people

### Normal:

- developmentally expected
- socially acceptable
- consensual, mutual, reciprocal
- shared decision making

### Inappropriate:

- single instances of inappropriate sexual behaviour
- socially acceptable behaviour within peer group
- context for behaviour may be inappropriate
- generally consensual and reciprocal

### Problematic:

- 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

### Abusive:

- 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

### Violent:

- physically violent sexual abuse
- instrumental violence which is physiologically and/or sexually arousing to the perpetrator
- sadism

(Adapted from Hackett, 2010)

Behaviours falling under the inappropriate and problematic categories will not necessarily need to be referred to social services, with early intervention strategies within an educational setting often proving to be beneficial to the child/young person at this stage (Welsh Government 2020)<sup>2</sup>. However, behaviour that is violent and abusive will need to be referred to the social services by the Designated Safeguarding Person (Welsh Government, 2020).

## Recognising age-appropriate behaviours

The charity Brook, which operates a range of sexual health and wellbeing services across the UK, offers training and an accompanying [Sexual Behaviours Traffic Light Tool](#) which provides further information about healthy sexual development. This can help you to understand key laws relating to sexual behaviour, identify more specific age-appropriate behaviours, and gain knowledge on how to have robust and meaningful conversations on harmful sexual behaviours that cause concern.

## Preventing and responding to incidents of peer-on-peer sexual harassment

### Be aware of policies, procedures, and legislation

#### Statutory policies

As an EWC registrant, it is essential to ensure that you are aware of the relevant statutory duties with respect to the welfare of children and young people within your setting.

Section 130 of the Social Services and Wellbeing (Wales) Act 2014 places a duty on 'relevant partners' to inform the local authority if they have reasonable cause to suspect a child is at risk. This is defined as where a child is at risk of or experiencing abuse, neglect, or other kinds of harm, and has needs for care and support.

Schools are also required to follow anti-discrimination laws, and staff must act to prevent discrimination, harassment, and victimisation within the school under the United Nations Convention on the Rights of the Child (UNCRC).

You should be aware of your obligations under the Equality Act 2010, which states that you must give due regard to the need to eliminate unlawful discrimination, harassment, and victimisation, and other conduct that is prohibited by the Act.

All maintained schools in Wales are required to include provision for Relationships and Sexuality Education (RSE). Guidance on this is outlined within Welsh Government's Relationships and Sexuality Education Code (2022) which sets out the themes and matters that need to be covered in RSE (for children aged 3-16).

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2 Decision making around referrals to statutory services should also be balanced against any other needs or concerns and the wider contexts for individual children or young people.

## Policies within your setting

You should also ensure that you are familiar with, and adhere to, any relevant policies within your setting. These may include, but are not limited to:

- anti-bullying policies
- behaviour policies
- child protection/safeguarding policies
- online safety policies
- sexual harassment policies
- RSE policies

## Help to create a safe and supportive culture within your organisation

It is important to ensure that all children and young people feel safe and respected within their places of learning. You can support this by working to create an environment where inappropriate, problematic, abusive, or violent sexual behaviour is recognised and properly addressed.

You should set clear expectations from the start, and be clear that you will not tolerate offensive language or behaviour. This includes 'banter' and 'jokes' which may fall under the inappropriate category on the Hackett continuum.

It is also important to reassure children and young people who have been harmed sexually that they will be listened to and taken seriously, and that their concerns will be acted upon if they speak out. You should therefore seek to be approachable to children and young people and encourage them to talk to you, or another trusted colleague or adult, if they have concerns.

As an EWC registrant, you should be a positive role model for children and young people and seek to exhibit respectful and appropriate behaviour. You should talk to your colleagues regarding issues that they are encountering and how they have addressed them. Where appropriate, you should encourage colleagues to ensure that they are dealing with inappropriate or problematic sexual behaviour, including peer-on-peer sexual abuse, effectively and appropriately. You may wish to consider putting up posters to help children and young people identify who they can talk to and where they should go if they have a complaint, feel they have been a victim of sexual harassment or abuse, or if they have observed an incident taking place. Such posters could potentially be co-created with children and young people.

The teaching of RSE is a mandatory requirement in the Curriculum for Wales, for all learners from age 3 to 16, and plays a vital role in creating a safe and supportive culture for children and young people. Estyn advise that RSE provision should offer sufficient, cumulative, and beneficial learning opportunities for children and young people across the whole age range about healthy relationships, sex, and sexuality (Estyn 2021). The, 'Empowerment, Safety and Respect' strand within the RSE code, focuses specifically on how "learners need to develop an understanding of the social, emotional, physical, and legal nature and impact of harmful behaviours, including all bullying, and LGBTQ+ based bullying, sexual violence, and gender-based violence in a range of contexts, including online". The code also states that RSE should support learners (from age 11) to understand "how to advocate for safe environments and the rights and understanding of everyone on a range of RSE issues" and addresses "the



importance of safely speaking out against sex and gender based and sexual violence”.

As part of a ‘whole organisation approach’, it is important to also engage with parents and guardians, communicating with them early where there are welfare concerns regarding children and young people, and to continue to keep them involved and informed as issues are addressed.

## **Respond appropriately to incidents of peer-on-peer sexual harassment**

Children and young people may disclose incidents of peer-on-peer sexual harassment in a number of different ways, either directly or indirectly. There may also be indications through their behaviour, or other non-verbal communications (such as writing letters or drawing pictures), that an incident has taken place.

If a child or young person does make a disclosure to you, you must act in accordance with your organisation’s policies.

The NSPCC advises that it may be helpful to remember the following approaches if a child or young person discloses an incident to you:

- acknowledge the person has shown courage talking to you. Reassure them that they have done the right thing by reporting the incident, and that they will be taken seriously and be kept safe.
- listen carefully and give them your full attention. Be calm, supportive, and non-judgmental.
- display empathy and understanding, but do not try to investigate or ask leading questions
- be clear about the steps that you will take next. Do not make promises about maintaining confidentiality that you will not be able to keep. Be clear about who you must tell (for example, the designated safeguarding person).

Once a disclosure has been made you must report this to your designated safeguarding person immediately, in line with your organisation’s relevant policies.

If you personally witness an incident of peer-on-peer sexual harassment and/or abuse, it is important for you to take immediate action to prevent the behaviour from escalating, and to keep those involved safe. Follow your organisation’s relevant policies, and ensure that you notify your designated safeguarding person as soon as possible.

## **Report and record incidents of peer-on-peer sexual harassment**

Make sure that you’re aware of, and understand, the relevant processes for reporting incidents and that you follow these carefully.

You should keep detailed records about any incidents of peer-on-peer sexual harassment that you witness, or that are disclosed to you. Within your record, you should aim to include:

- the date and time of the incident
- what was happening before the incident took place
- specific details of the incident



- whether the behaviour appeared spontaneous or premeditated
- how the child or young people involved in the incident reacted

Within your record it is important to only state what has been observed, and to avoid terms such as 'inappropriate behaviour' or value-based judgements.

This should be shared and reported to your designated safeguarding person, in line with your organisation's policies.

Your designated safeguarding person should also record how your organisation has responded to any incidents of peer-on-peer sexual harassment. This will make it easier to identify any patterns in behaviour that might be cause for concern and any action/changes that may be necessary.

## Definitions

The definitions included here are not limited to the ones used in this guide and includes terms you may come across in your own research and learning.

### Bystander

A person who observes behaviour or conduct that is in violation of the rules or policies of an institution. Bystander intervention is when a bystander's safe and positive actions prevent harm or intervene when there is a risk posed to another person.

### Coercion

The use of authority or force to impose an unwanted advance. The act of compelling by force of authority.

### Consent

An affirmative decision to engage in mutually agreed upon sexual activity which is given by clear words or actions. Consent may not be inferred from silence, passivity or lack of resistance alone. Furthermore, consent to one form of sexual activity does not imply consent to other forms of sexual activity, and the existence of a current or previous dating, marital or sexual relationship is not sufficient to constitute consent to additional sexual activity.

### Discrimination

The unequal treatment of members of various groups, based on protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief (or lack of belief), sex and sexual orientation).

### Deepfake porn

A video of a person in which their face or body has been digitally altered so that they appear to be someone else, typically used maliciously or to spread false information.

### Gender-based harassment

Refers to acts of aggression, intimidation, stalking, or hostility based on gender, gender identity, or gender-stereotyping.

### Harmful sexual behaviour (HSB)

Harmful sexual behaviours (HSB) can be defined as: sexual behaviours expressed by children and young people under the age of 18 that are developmentally inappropriate, may be harmful towards themselves or others or be abusive towards another child, young person or adult. This definition of HSB includes both contact and non-contact behaviours such as grooming, exhibitionism, voyeurism and sexting or recording images of sexual acts via smart phones or social media applications. (Wales Safeguarding Procedures, 2020)

## Intent

The purpose or intention of an action, from the actor's point of view. A person's good intent is not relevant in determining whether behaviour may be sexual harassment.

## Incel

A person (almost always male and typically young) who regards themselves as being involuntarily celibate as they feel unable to attract women sexually. Incels are often associated with misogynistic online communities and their outlook is characterised by extreme resentment and hostility towards those who are sexually active.

## MeToo

A social movement and awareness campaign calling attention to the frequency with which primarily women and girls experience sexual assault and harassment.

## Misogyny

A dislike of, contempt for, or ingrained prejudice against women.

## Sexual harassment

Includes any unwelcome sexual advances, requests for sexual favours, or other unwelcome written, verbal, or physical conduct of a sexual nature.

## Revenge porn

The sharing of private, sexual materials, either photos or videos, of another person, without their consent and with the purpose of causing embarrassment or distress.

## Stalking

Engaging in a course of conduct directed at specific person(s) that would cause a reasonable person to fear for his or her safety, the safety of others, or to suffer substantial emotional distress.

## Sexting

Sexting commonly refers to the sharing of illicit images, videos or other content between two or more persons. Sexting can cover a broad range of activities, from the consensual sharing of an image, to instances of children being exploited, groomed, and bullied into sharing images, which in turn may be shared with peers or adults without their consent (Crown Prosecution Service, 2017).

It is important to remember that whilst the age of consent in the UK is 16, it is an offence to make, distribute, possess, or show any indecent images of anyone aged under 18, even if the content was created with the consent of that young person.

## Upskirting

Taking photographs or videos underneath a person's clothing without their consent.

## Useful links and resources

### Welsh Government Safeguarding policies

[Wales Safeguarding Procedures \(2021\) Safeguarding children from child sexual exploitation](#)

[Wales Safeguarding Procedures \(2021\) Safeguarding children where there are concerns about harmful sexual behaviour](#)

[Welsh Government \(2016\) Violence Against Women, Domestic Abuse and Sexual Violence: Guidance for Governors](#)

[Welsh Government \(2019\) Rights, respect, equality: Statutory guidance for governing bodies of maintained schools](#)

[UK Government \(2020\) Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

### Other useful sources of advice and resources

#### Barnardo's

Barnardo's provide a range of [support to children, young people, parents and carers](#), including specific child abuse and exploitation services.

#### Brook Cymru

[Brook](#) is a national charity supporting people with their sexual health and wellbeing. They also provide training and learning resources to support professionals to provide relationships and sex education and wellbeing support to young people.

[What is sexual harassment](#)

#### Centre of expertise on child sexual abuse

The Centre of expertise on child sexual abuse is a multi-disciplinary team, funded by the Home Office and hosted by Barnardo's, that offers a [number of resources tailored to help education professionals](#) when they have concerns of child sexual abuse or behaviour.

#### Education Workforce Council (EWC)

In 2023, the EWC hosted a [Masterclass event on understanding and addressing sexual harassment in education settings](#).

This was followed by a [podcast episode where experts answered questions](#) outstanding from the Masterclass event.

#### Equality and Human Rights Commission

The [Equality and Human Rights Commission](#) promotes and upholds equality and human rights ideals and laws across England, Scotland and Wales.

## National Education Union (NEU)

The NEU have produced [reports and resources on sexism and sexual harassment in schools](#) and have a campaign toolkit that aims to help NEU members take the steps they need to prevent sexism and sexual harassment. They also supported the [AGENDA resource](#), a practitioner toolkit that draws upon affirmative, creative, and inclusive methods to address healthy relationships, including gender in/equality, bullying, and sexual harassment.

## NSPCC

The [NSPCC](#) have produced a range of research reports and resources that aid professionals in tackling and addressing sexual abuse and harassment. Read more about [understanding how young people are learning about relationships, sex and sexuality](#), including sexual harassment.

They also have an education helpline for those wishing to speak to someone about any concerns they may have.

## Rape Crisis England & Wales

[Rape Crisis offers a 24/7 free phone and online chat service](#) for anyone aged 16+ in England and Wales who has been affected by rape, child sexual abuse, sexual assault, sexual harassment, or any other form of sexual violence.

## Rape and Sexual Abuse Support Centre (RASAC), North Wales

[RASASC North Wales](#) provides information, specialist support and therapy to anyone aged 3 and over who has experienced any kind of sexual abuse or violence.

## Stonewall

Stonewall provides [support to schools and colleges to challenge bullying and celebrate diversity](#), and offers a range of online training and resources.

## Umbrella Cymru

[Umbrella Cymru](#) are a charity who provide advice and support in relation to gender and sexual diversity and aim to advance diversity, equality and inclusion across Wales.

## Welsh Women's Aid

[Welsh Women's Aid](#) provide services to survivors of violence and abuse, as well as delivering a range of preventative services in local communities.

## References

Brook (unknown publication date): [Sexual behaviours traffic light tool](#)

Brook (unknown publication date): [How to manage a disclosure of sexual harassment or assault](#)

Childnet.com (2023): [Step up and speak up against online sexual harassment – resources](#)

Children, Young People and Education Committee (2022): [Everybody's affected Peer on peer sexual harassment among learners](#)

Committee of University Chairs (2022): [Tackling harassment and sexual misconduct. Guidance for Chairs and Governing Bodies](#)

Estyn (2021): [“We don’t tell our teachers” Experiences of peer-on-peer sexual harassment among secondary school pupils in Wales](#)

Estyn (2023): [Peer-on-peer sexual harassment among 16 to 18-year-old learners in further education](#)

NAHT (2021): [Project deSHAME: resources for teachers and parents to tackle peer-based online sexual harassment](#)

NSPCC (2021): [Resources on harmful sexual behaviour in schools including peer-on-peer sexual abuse and healthy relationships](#)

Renold, E.J., Bragg, S., Gill, C., Hollis, V., Margolis, R., McGeeney, E., Milne, B., Ringrose, J., Timperley, V. and Young, H. (2023): [“We have to educate ourselves”: prioritising young people’s voices and their recommendations for change](#)

[Social Services and Wellbeing \(Wales\) Act 2014](#)

[The United Nations Convention on the Rights of the Child \(1989\)](#)

Welsh Government (2019): [National Action Plan Preventing and Responding to Child Sexual Abuse](#)

Welsh Government (2020): [Guidance for education settings on peer sexual abuse, exploitation and harmful sexual behaviour](#). To be read in conjunction with the All Wales Practice Guide on Safeguarding Children where there are concerns about Harmful Sexual Behaviour and the Wales Safeguarding Procedures

Welsh Government (2021): [The Curriculum for Wales – Relationships and Sexuality Education Code](#)

Welsh Government (2022): Social Services and Well-being (Wales) Act 2014. [Working Together to Safeguard People: Code of Safeguarding Practice](#). For individuals, groups and organisations offering activities or services to children and adults in Wales.

