

TITLE		REF	VERSION
Child-On-Child Abuse, Student Harassment and Sexual Misconduct Procedure		LSPRO043	4.0
DEPARTMENT		Group Student Support	
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# CHILD-ON-CHILD ABUSE, STUDENT HARASSMENT AND SEXUAL MISCONDUCT PROCEDURE

## Procedure Statement

Activate Learning is committed to providing an inclusive and safe learning environment where all students and apprentices can thrive in line with our Learning Philosophy. We uphold a culture where abuse of any kind, including child-on-child abuse, harassment, and sexual misconduct, is not tolerated.

We take all disclosures of abuse seriously, regardless of when the incident occurred or where it took place. We provide clear, accessible disclosure mechanisms for students and staff to report concerns. Allegations against fellow students will be addressed through a fair and proportionate response in line with the procedures outlined below.

Staff are trained to identify safeguarding concerns, respond sensitively to disclosures, and adopt an attitude of "it could happen here" in line with Keeping Children Safe in Education (KCSIE). We also recognise the significant role of technology in facilitating abuse and harassment and remain vigilant in addressing online harms.

## Purpose

This procedure defines how Activate Learning staff will respond to concerns or reports of child-on-child abuse, sexual harassment, and sexual misconduct between students. It aligns with:

- Keeping Children Safe in Education (KCSIE) statutory guidance.
- Office for Students (OfS) Conditions of Registration on harassment and sexual misconduct.
- Activate Learning's Safeguarding and Child Protection Policy, Safeguarding – Reporting a Concern Procedure, Student Positive Behaviour Management Policy, and Student Positive Behaviour Management Procedure.

## Scope

This procedure applies to all Activate Learning students and apprentices, covering:

- Child-on-child abuse involving students under 18.
- Harassment or sexual misconduct involving students of any age.
- Incidents occurring on-site, in residential accommodation, in the community, online, on work placements, or during residential visits.

Allegations against staff will be handled under the Allegations Against Staff Procedure, and complaints of harassment by staff against students will be addressed through the Student Positive Behaviour Management Policy and Procedure.

## Responsibilities

All staff have a responsibility to:

- Create and maintain a safe learning environment.
- Recognise that abuse and harassment can happen both inside and outside college settings, including online.
- Challenge inappropriate behaviour - dismissing sexual harassment as "just banter" contributes to a culture of normalised abuse, making it less likely that victims will come forward.
- Report concerns immediately via appropriate safeguarding channels, ensuring timely intervention and support.

Activate Learning is committed to supporting victims, providing appropriate pastoral care, and referring students to specialist services where necessary.

## **Procedure**

### **Identifying**

All Activate Learning staff receive comprehensive safeguarding training on how to recognise, respond, record, and report concerns, including child-on-child abuse and sexual harassment. Regular safeguarding updates ensure staff remain informed of the latest guidance, risks, and best practices.

Activate Learning recognises that child-on-child abuse can manifest in a spectrum of behaviours, including but not limited to:

- Sexual violence, such as rape, assault by penetration, sexual assault, or causing someone into sexual activity without consent.
- Sexual harassment, including sexually explicit comments, innuendos, jokes, gestures, displaying sexual images/videos, upskirting, or online harassment.
- Online sexual harassment, such as consensual and non-consensual sharing of nude or semi-nude images or videos ('sexting' or 'youth produced sexual imagery'), revenge pornography, coercion into sharing explicit content, and sharing unwanted sexual material.
- Bullying, including cyberbullying, prejudice-based or discriminatory bullying, racism, misogyny, misandry, and hate crimes.
- Abuse in intimate relationships, sometimes referred to as 'teenage relationship abuse.'
- Physical abuse, such as hitting, kicking, or hair-pulling.
- Initiation and hazing rituals, which can involve humiliation, violence or coercion.
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE), including serious youth violence, gang-related activity, county lines, modern slavery, and human trafficking.

Harassment refers to a pattern of unwanted, aggressive behaviour that causes distress, fear, or harm. It includes repeated actions that violate another's dignity or create a hostile, intimidating, or degrading environment.

Sexual harassment refers to any unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. This includes, but is not limited to:

- Unwanted sexual comments, jokes, or gestures.
- Unwelcome sexual advances or pressure for sexual activity.
- Sharing sexually explicit images or content without consent.
- Unwanted physical contact of a sexual nature.

Sexual misconduct/violence means any unwanted or attempted unwanted conduct of a sexual nature and includes but is not limited to sexual harassment; sexual assault; and rape.

We recognise that child-on-child abuse, harassment, or sexual misconduct can occur in-person, online, or through technology-based interactions and may escalate to physical or sexual abuse, if unchallenged.

### **Prevention**

Activate Learning is committed to preventing, identifying, and appropriately managing child-on-child abuse, harassment, and sexual misconduct both within and beyond our learning environments. We take a contextual safeguarding approach, recognising that students' experiences extend beyond the college environment and may be influenced by factors in their communities, online spaces, and peer relationships.

Students receive preventative education on key topics such as consent, mutual respect, online safety, and safeguarding through various platforms, including:

- Connect to College and Connect to Residential induction programmes.
- 'Speak Up, Speak Out' and 'Active Bystander' campaigns.
- Personal and Social Development (PSD) tutorials.
- Engagement with national initiatives, such as Safer Internet Day.

Expectations regarding positive behaviour are reinforced through the Positive Behaviour Management Framework, learner agreements, IT Acceptable Use agreements, and the Student Code of Conduct.

We actively seek to understand students' lived experiences, ensuring their voices inform our approach to safeguarding. We gather and review student feedback at regular intervals through:

- Student conferences, learner surveys, and focus groups.

- Student Leadership Team activities.
- Engagement with national and local events.

Key stakeholders, including the Heads of Student Experience, Accommodation Managers, Group Directors for Faculty and Campus, and Designated Safeguarding Leads, review this feedback and take appropriate action to improve our safeguarding culture.

### **Recognising**

Activate Learning acknowledges that students may find it difficult to verbally disclose abuse or harassment. Instead, concerns may come to light through:

- Changes in a student's behaviour or emotional presentation.
- Observations by staff of concerning interactions or discussions.
- Reports from 3<sup>rd</sup> parties e.g., peers, caregivers, or external agencies.

Signs that a student may be experiencing child-on-child abuse, harassment, or sexual misconduct can overlap with other types of abuse and may include (but are not limited to):

- Disengagement from education or a sudden drop in performance.
- Physical injuries without a clear explanation.
- Emotional distress, anxiety, or withdrawal from social interactions.
- Sudden changes in appearance, behaviour, or mood.
- Increased use of substances (drugs, alcohol).
- Exhibiting abusive behaviours towards others.

This list is not exhaustive, and these signs do not always indicate abuse. Staff must remain vigilant, exercise professional curiosity, and act on concerns immediately rather than waiting for a disclosure.

While all students can be at risk, we recognise that some are particularly vulnerable to abuse from their peers, including:

- Students with Special Educational Needs and Disabilities (SEND).
- Students from minority ethnic backgrounds.
- Those who have experienced Adverse Childhood Experiences (ACEs).
- Young people in need of a social worker or those who are care experienced.
- LGBTQ+ students.

We also acknowledge that while any gender can be affected, research indicates that girls are more likely to be victims and boys more often perpetrators. However, we challenge all forms of abuse, regardless of gender (or other protected characteristics), ensuring a culture of respect, equality, and accountability within our learning environments.

### **Reporting**

Activate Learning accepts reports from students who have experienced or witnessed abuse, harassment, or sexual misconduct, as well as from third parties such as parents/guardians, external reporting centres, the police, or other agencies.

Students can approach any member of staff to share concerns about themselves or others. All staff must respond to disclosures in line with the Safeguarding – Reporting a Concern Procedure, ensuring they take the report seriously, reassure the student that they will be supported, and by not promising confidentiality, as information may need to be shared for safeguarding purposes.

All Activate Learning staff should report concerns about child-on-child abuse, harassment, or sexual misconduct through one of the following methods:

- Completing a [Safeguarding Record of Concern Form](#).
- Speaking to the Safeguarding Team on 01865 550401 or in person and immediately following up with a written referral.
- Emailing [safe@activatelearning.ac.uk](mailto:safe@activatelearning.ac.uk)

Students can report incidents directly to the Safeguarding Team using the following methods:

- Calling 01865 550401.
- Emailing [safe@activatelearning.ac.uk](mailto:safe@activatelearning.ac.uk)
- Speaking to a Designated Safeguarding Adviser.

- Using the 'Help?' button on their Activate Learning Online portal.

## **Response**

All reports of child-on-child abuse, harassment, or sexual misconduct will be assessed on an individual basis by the Safeguarding Team, using professional judgement to determine the most appropriate next steps. Decisions may be informed by Hackett's Continuum Model (Appendix 1) to evaluate the level of risk and response required. There are three primary response options:

### **1. Manage Internally**

A concern may be managed internally if:

- The students involved do not require statutory intervention or early help.
- The behaviour falls within the 'normal', 'inappropriate', or 'problematic' categories under Hackett's Continuum Model.
- No crime has been committed, and the concern can be addressed through education, pastoral support and behavioural interventions.

For example, one-off incidents of bullying may be addressed through the Student Positive Behaviour Management Procedure, with additional support from the Faculty/Programme Area, Progress Coaches or Behaviour and Welfare Officer.

All decisions to manage an incident internally must:

- Be based on the principle that harassment or abuse is never acceptable and will not be tolerated.
- Be fully documented by the relevant team (e.g., Faculty, Programme Area, Behaviour and Welfare Officer, Accommodation Team or Safeguarding Team).
- Be recorded appropriately (e.g., under Positive Behaviour Management Procedures and/or alterations made to a student's ProMonitor Support Plan).

### **2. Early Help**

Early help is appropriate for students who need additional support but do not meet the threshold for specialist safeguarding intervention. Support may be provided internally through:

- Progress Coaches.
- Learning Support or Study Mentors.
- Behaviour and Welfare Officers.
- Wellbeing or Counselling Services.
- College Nurse Services (in Oxfordshire).
- Financial support, such as applications for student bursaries.
- Academic support, such as applications for extenuating circumstances.
- Safeguarding Team.

External early help referrals may include:

- Community Mental Health Services.
- GP or Primary Care Services.
- Clinical sexual health services e.g., Brook or Terrance Higgins Trust.
- Youth Services and Mentoring.
- Substance Misuse Support.

The Safeguarding Team will use their professional judgement and knowledge of the Local Offer to determine the most appropriate services. All early help referrals will be documented in CPOMS, with updates reflected in the student's ProMonitor Support Plan.

### **3. Reporting Externally**

#### **Students Under 18**

For students under 18 years old, Activate Learning follows the Department for Education (DfE) guidance on information sharing, applying the following principles:

- Parents/carers will usually be informed, unless doing so would place the student at greater risk.
- If a child is 'in need', at risk of harm, or has been harmed, a referral will be made to Children's Social Care.
- If a report of rape, assault by penetration, or sexual assault is made, a referral will be made to the Police.

Where a referral is made against the student's wishes, the reasoning should be clearly explained to them,

and specialist support should be offered where appropriate.

### **Students Over 18**

For students aged 18 and over, Activate Learning recognises the importance of control and choice in safeguarding decisions. Students will be offered:

- Support and signposting to a Sexual Assault Referral Centre (SARC).
- Referral to a GP or local sexual health clinic.
- Advice on how to report incidents to the Police.

However, where a report involves an adult student at risk, safeguarding actions will be taken in accordance with Adult Safeguarding procedures and the Care Act 2014. An adult at risk is defined as a person aged 18 or over who:

- Has care and support needs (e.g., due to disability, mental health difficulties, or other vulnerabilities).
- Is experiencing, or is at risk of, abuse or neglect.
- Is unable to protect themselves from harm due to their care and support needs.

### **Next Steps**

Requirements will be assessed on a case-by-case basis. The Safeguarding Team will consider:

- The wishes of the victim and how they want to proceed.
- The nature of the alleged incident(s), including whether a crime may have been committed or whether the behaviour constitutes harmful sexual behaviour.
- The ages and developmental stages of those involved.
- Any power imbalance between the individuals (e.g., differences in age, confidence, maturity, or additional needs such as disabilities or learning difficulties).
- Whether the incident is isolated or part of a sustained pattern of abuse.
- Any ongoing risks to the victim, alleged perpetrator, other students, staff, or the wider community.

### **Communication**

All staff must inform students that any safeguarding concerns will be reported to the Safeguarding Team but reassured that they will be kept informed of the next steps.

Activate Learning will do all they reasonably can to protect the anonymity of any students involved in any report of child-on-child abuse, harassment or sexual misconduct. However, information they disclose may be used, for example during a disciplinary process or shared with external agencies to protect the individual or others, particularly in cases where there is a wider public protection concern.

For students under 18, parents and carers will be informed unless doing so would place the child at greater risk. Before sharing information, the Safeguarding Team may seek guidance from the Police and/or Children's Social Care to ensure disclosure does not compromise any ongoing criminal investigation.

Once appropriate, separate communication will take place with the student(s) and the parents/carers of both the alleged victim and the alleged perpetrator. This will outline:

- The support and safeguarding measures being put in place.
- An opportunity for parents/carers to share their views and concerns.
- The rationale for decisions made, ensuring transparency.

All decisions, along with the reasoning behind them, must be clearly documented.

### **Risk Assessment**

Where a report indicates that a student (either the alleged victim or alleged perpetrator) may be at risk of harm or may pose a risk to others within the college, residential or placement settings, the Safeguarding Team will complete a Safeguarding Personal Risk Assessment to evaluate risks and determine necessary safeguarding measures.

In cases of sexual violence, a professional risk assessment may be required from social workers, sexual violence specialists, or other external agencies. Activate Learning's internal risk assessment is not intended to replace expert assessments but will help inform internal safeguarding decisions. All risk assessments will be securely documented by the Safeguarding Team and shared with relevant staff on a need-to-know basis only.



Activate Learning is committed to ensuring that all students and apprentices can continue their studies wherever possible. However, in cases of sexual violence, immediate safeguarding measures will be implemented:

- The alleged perpetrator(s) will be removed from any shared classes with the victim(s).
- The college will take reasonable steps to maintain a safe distance between the victim and alleged perpetrator while on college premises or work placements. This may involve:
  - Temporary timetable adjustments.
  - Periods of remote learning.
  - Removal from halls of residence.
  - Changes to work placements or place of study.
  - Suspension under the Student Positive Behaviour Management Procedure.
  - Students studying on regulated or accredited courses may also be subject to additional safeguarding or fitness-to-practice requirements.

These safeguarding measures will be implemented as soon as possible following the report and will not be delayed for a Police investigation to begin. However, all decisions will be made in the best interests of all students involved and should not be interpreted as a presumption of guilt against the alleged perpetrator.

### **Outcomes**

If disciplinary action is being considered, the Safeguarding Team must consult with the Police and Social Care to ensure that any steps taken do not interfere with an ongoing investigation. However, the involvement of external agencies does not prevent Activate Learning from making its own determination, based on the balance of probabilities, regarding the incident. This may result in a student being withdrawn from their studies before the conclusion of external investigations. If this occurs, the Safeguarding Team will inform the relevant professionals of the outcome.

If a Police investigation does not progress to a criminal case, or if a case concludes with no further action or a 'not guilty' verdict, the Safeguarding Team will:

- Review risk assessments and support plans to determine whether any safeguarding measures remain necessary.
- Ensure appropriate support remains in place for those affected.
- Clearly communicate decisions to the students involved.

### **False or Malicious Reports**

If a report is found to be unsubstantiated, unfounded, false, or malicious, the Safeguarding Team will assess whether the individual who made the allegation requires support or if a referral to Children's or Adult Social Care is necessary. If an allegation is determined to be deliberately invented or malicious, the Safeguarding Team and Faculty/Programme Owner will consider whether disciplinary action is appropriate, following the Student Positive Behaviour Management Procedure.

### **Support**

Activate Learning recognises that experiencing or witnessing child-on-child abuse, sexual harassment, or sexual violence can have a significant impact on people. The victim(s), alleged perpetrator(s), and their peers may require ongoing support.

We also acknowledge that online abuse - whether occurring in isolation or linked to face-to-face incidents - can introduce additional complexities, including repeat victimisation across multiple platforms. Staff must remain vigilant to any bullying or peer victimisation that may arise within college, halls of residence, work placements, or online, and take appropriate action to safeguard those involved.

Support may include:

- Regular welfare checks with the students involved.
- Referrals to internal support services, such as Progress Coaches, Learning Support, Counselling, or the College Nurse.
- Referrals to external specialist services, such as Targeted Youth Support, Children's or Adult's Social Care, mental health services, or the Police.
- Targeted education and intervention, either internally or via external agencies.
- Signposting students affected by harassment or sexual misconduct to specialist support services.
- Tailoring support to meet the needs of students with protected characteristics (e.g., disabilities, cultural sensitivities, LGBTQ+ identities).

- Providing support at key moments, such as before, during, or after an investigation.
- Academic support, where a student's learning or progression has been affected by the incident.

### Responding to a Concern Outside of Normal College Hours

The Safeguarding Team is available during normal business hours: Monday – Thursday: 08:30 – 17:00, and Friday: 08:30 – 16:30. However, in exceptional circumstances or in residential settings, staff may become aware that a student is at immediate risk of harm outside of these hours, such as evenings, weekends, or bank holidays. In these situations, staff must take appropriate action to ensure the student's safety.

If a student is in immediate danger or at imminent risk of harm, call 999 and request emergency assistance. For non-urgent concerns requiring police involvement, contact 101.

If staff have concerns that a child or adult at risk is experiencing abuse, they should contact the Children's or Adult Social Care department in the Local Authority where the student resides. Each local authority operates an 'out of hours' service:

Local Authority	Contact Number
Surrey	01483 517898
Reading, Windsor and Maidenhead, Wokingham	01344 786543
Bracknell	01344 352000
Oxfordshire (including Banbury and Blackbird Leys)	0800 833408
Hampshire	0300 555 1373
Unsure of which Local Authority to contact?	<a href="https://www.gov.uk/report-child-abuse-to-local-council">https://www.gov.uk/report-child-abuse-to-local-council</a>

Staff should take reasonable steps to safeguard the student(s) while awaiting external support, including:

- Keeping the alleged victim and perpetrator separate.
- Searching for and confiscating any prohibited items (if applicable).
- Informing parents/carers (for students under 18), unless doing so would put the student at greater risk.

Once an 'out of hours' referral has been made, staff must inform the Safeguarding Team via the standard reporting channels. The Safeguarding Team will follow up to provide ongoing support to the student(s).

### Record Keeping

All safeguarding information is collected sensitively and handled with confidentiality, regardless of the reporting method used - whether in person, online, or through a third party. All reports made to the Safeguarding Team are securely recorded in CPOMS. Records must be accurate, timely, and factual, ensuring that all actions taken and decisions made are fully documented. Safeguarding records will only be accessible to authorised staff on a need-to-know basis to maintain confidentiality and data protection compliance.

If an alleged victim or perpetrator moves to another education institution, the Safeguarding Team will inform the new provider of any ongoing support needs and, where appropriate, any potential safeguarding risks to students or staff, ensuring that safeguarding files are securely transferred in line with statutory guidance when the destination is known.

For incidents involving students aged 14–16, the 14-16 Programme Manager must be informed, and, where appropriate, the student's secondary school should be notified.

### Monitoring

Activate Learning has robust processes for capturing and analysing data related to child-on-child abuse, harassment, and safeguarding incidents. Safeguarding data is reported at Group Executive Team meetings, Safeguarding Committee, the Online Safety Working Group, and Corporation Board meetings.

The DSL and DDSs regularly review safeguarding data to identify trends and emerging risks. The Safeguarding Team works collaboratively with internal and external partners to respond to areas of concern which may include providing targeted safeguarding education sessions for students, increasing staff presence in identified risk areas, making physical alterations to the learning environment to improve safety

and working with the Police and external agencies to disrupt harmful or criminal behaviours.

## Complaints

Complaints can be raised through Activate Learning's Compliments, Comments and Complaints process.

## References

Keeping Children Safe in Education  
Working Together to Safeguard Children  
Department for Science, Innovation and Technology: Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People  
Department for Education: Searching, Screening and Confiscation: Advice for Schools  
Department for Education: Child Abuse Concerns: Guide for Practitioners  
Department for Education: Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers  
Department for Education: Further Education Residential Accommodation: National Minimum Standards  
Farrer and Co Addressing Child-On-Child Abuse: A Resource for Schools and Colleges  
Office for Students Condition E6: Harassment and Sexual Misconduct  
NSPCC: Harmful Sexual Behaviour Framework  
Activate Learning: Student Positive Behaviour Management Procedure  
Activate Learning: Student Positive Behaviour Management Policy  
Activate Learning: Safeguarding and Child Protection Policy  
Activate Learning: Safeguarding – Reporting a Concern Procedure  
Activate Learning: Student Criminal Convictions Procedure  
Activate Learning: Compliments, Comments and Complaints Procedure  
Activate Learning: Procedure for Individual and Medical (Personal) Risk Assessments and PEEPs

## Appendices

### Appendix 1: Hackett's, 2010 Continuum of Sexual Behaviours

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviour	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable			Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Socially acceptable behaviour within peer group	Developmentally unusual and socially unexpected	Coercion and force to ensure victim compliance	Instrumental violence which is psychologically and/or sexually arousing to the perpetrator
Shared decision making	Context for behaviour may be inappropriate	No overt elements of victimisation	Intrusive	Sadism
	Generally consensual and reciprocal	Consent issues may be unclear	Informed consent lacking or not able to be freely given by victim	
		May lack reciprocity or equal power	May include elements of expressive violence	
		May include levels of compulsivity		

### Appendix 2: Support in the Community

- **NSPCC** ([nspcc.org.uk](https://www.nspcc.org.uk)) – Offers support and protection for children facing abuse, including Childline (0800 1111).
- **Childline** ([childline.org.uk](https://www.childline.org.uk)) – A free, confidential helpline for children and young people (0800 1111).
- **Barnardo's** ([barnardos.org.uk](https://www.barnardos.org.uk)) – Provides services for children who have experienced abuse and exploitation.



- **The Lucy Faithfull Foundation** ([lucyfaithfull.org.uk](http://lucyfaithfull.org.uk)) – Works to prevent child sexual abuse and provides support for victims.
- **Rape Crisis England & Wales** ([rapecrisis.org.uk](http://rapecrisis.org.uk)) – Specialist services for women and girls who have experienced sexual violence.
- **Survivors Trust** ([thesurvivorstrust.org](http://thesurvivorstrust.org)) – A UK-wide network offering support to survivors of rape, sexual violence, and childhood sexual abuse.
- **Safeline** ([safeline.org.uk](http://safeline.org.uk)) – Supports survivors of sexual abuse and rape, including a male survivor helpline.
- **Survivors UK** ([survivorsuk.org](http://survivorsuk.org)) – Supports male survivors of sexual abuse, rape, and assault.
- **Galop** ([galop.org.uk](http://galop.org.uk)) – Supports LGBTQ+ individuals facing domestic abuse, sexual violence, and hate crime.
- **Victim Support** ([victimsupport.org.uk](http://victimsupport.org.uk)) – Provides free and confidential help for victims of crime.

### Appendix 3:

Activate Learning adopts the definitions outlined in the Department for Education's "Keeping Children Safe in Education" and Farrer and Co's "Addressing Child-on-Child Abuse: A Resource for Schools and Colleges". Some of these definitions are summarised below:

**Bullying:** Although there is no legal definition of bullying, it is generally described as repeated behaviour by an individual or group that intentionally harms another individual or group, either physically or emotionally. Bullying often involves an imbalance of power between the perpetrator and the victim.

**Child Sexual Exploitation (CSE):** A form of sexual abuse where a child under 18 is coerced, manipulated, or deceived into sexual activity in exchange for something they need or want, or for the financial or status benefit of the perpetrator.

**Child Criminal Exploitation:** Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

**County Lines:** Refers to gangs or organised criminal networks using children to transport, store, and sell illegal drugs across geographical areas. This can involve coercion, violence (including sexual violence), and the use of weapons to control victims.

**Cyberbullying:** Purposeful, repeated behaviour designed to cause physical and emotional distress. Cyberbullying (or online bullying) is bullying using technologies, particularly over the internet or via mobile and gaming networks. Can include discrimination and hate crimes.

**Harassment:** A pattern of unwanted, aggressive behaviour that causes distress, fear, or harm. It includes repeated actions that violate another's dignity or create a hostile, intimidating, or degrading environment.

**Hate Crime:** Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice based on a person's protected characteristic or perceived protected characteristic. Such as race; religion, sexual orientation, disability, or gender identity. The offence of incitement to hatred occurs when someone acts in a way that is threatening and intended to stir up hatred. That could be in words, pictures, videos, music, and includes information posted on websites.

**Initiation / Hazing:** Could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element. It is distinct from bullying in that hazing typically serves to include someone, while bullying seeks to exclude.

**Online Sexual Harassment:** This may involve the non-consensual sharing of explicit content, sexualised online bullying, unwanted sexual messages or comments on social media, coercion, and threats, or forcing others to share explicit images or perform sexual acts online.

**Physical Abuse:** Includes hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).

**Sexual Harassment:** Is defined as unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. Sexual harassment can occur in various forms, including verbal, physical, or non-verbal behaviours, and can happen both in person and online. It can involve actions such as:

- Making sexual comments or jokes or taunting someone with sexual remarks.
- Engaging in unwelcome physical contact, such as brushing against someone, or making unwanted advances.
- Displaying sexual images or materials, including online content.
- Sending inappropriate sexual messages or making sexual gestures.
- Sexualized name-calling or commenting on someone's appearance in a sexual manner.
- Upskirting (taking images under someone's clothing), which is a criminal offence.

**Sexual Misconduct:** A broad term encompassing a range of inappropriate sexual behaviours, including sexual harassment and sexual violence.

**Sexual Violence:** Refers to sexual offences under the Sexual Offences Act as described below:

Rape: A person commits rape if:

- They intentionally penetrate the vagina, anus, or mouth of another person with their penis.
- The person being penetrated does not consent to the act.
- The person committing the act does not reasonably believe that the other person is consenting.

Assault by Penetration: A person commits this offence if:

- They intentionally penetrate the vagina or anus of another person with part of their body (e.g., fingers, tongue) or anything else.
- The penetration is sexual.
- The person being penetrated does not consent to the penetration.
- The person committing the act does not reasonably believe that the other person is consenting.

Sexual Assault: A person commits sexual assault if:

- They intentionally touch another person in a sexual manner.
- The touching is sexual.
- The person being touched does not consent to the touching.
- The person committing the act does not reasonably believe that the other person is consenting.

Causing someone to engage in sexual activity without consent: A person commits this offence if:

- They intentionally cause another person to engage in a sexual activity.
- The activity is sexual in nature.
- The person being made to engage in the activity does not consent to it.
- The person causing the activity to happen does not reasonably believe that the other person is consenting.

**Staff:** Refers to all paid and unpaid personnel working in or on behalf of Activate Learning, including volunteers, governors, contractors, and partners.

**Students:** Refers to all students enrolled at Activate Learning, including full-time, part-time, on-campus, online, and deferred students. This includes those residing in the college's residential accommodation. This does not include individuals not currently enrolled, where the Admissions Policy and Student Criminal Conviction Procedure may apply.

**Upskirting:** Is a crime and involves taking a picture or film under a person's clothing of their genitals or buttocks (whether exposed or covered with underwear) without their consent, with the intention of viewing the images to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

**Youth Produced Sexual Imagery:** The sharing of nude or semi-nude images, videos, or live streams by young people under the age of 18. This may occur via social media, chat apps, gaming platforms, or direct sharing between devices.