

Child-on-child Abuse, Sexual Harassment and Sexual Violence Policy.

BETHANY SCHOOL
CURTISDEN GREEN
GOUDHURST
KENT

Pupils' views on why Bethany has a Peer-on-peer abuse, sexual violence and sexual harassment policy.

Bethany has a Safeguarding & Child Protection Policy and to support the specific challenges of child-on-child abuse this policy is needed to give greater context on how Bethany School will both prevention of child-on-child abuse and deal with incidents when they arise.

Copy Location(s)	Master: DSL Copies: School website
-------------------------	-----------------------------------------------

Document Approved	August 2021
Date of Revision (if applicable)	
Date for Review	September 2023

Revision History

Version	Date Issued	Reason for Issue
1.0	1 st September 2021	Created to support Safeguarding and Child Protection Policy.
2.0	1 st September 2022	Annual review

Contents

1. Introduction
2. Preventing child-on-child abuse
3. Reporting child-on-child abuse
4. Sexual Violence and Sexual Harassment
5. Responding to reports of sexual violence and sexual harassment.

Introduction

This policy is available to all parents, prospective parents, adults working at or on behalf of Bethany School (including supply / agency staff), volunteers, contractors and the wider public on the School website in the tab “About Bethany” within the “Policies and provision of information” section.

The Governors, Headmaster and staff (this includes all adults working in proximity to children at Bethany School, including supply / agency staff, volunteers, contractors, visitors to the school and part-time staff) of Bethany School take seriously our responsibility under Sections 175 & 157 of the Education Act 2002 to safeguard and promote the welfare of all children; and are committed to the prevention, early identification, and appropriate management of child-on-child abuse, sexual violence and sexual harassment both within school and beyond the school. To this end this policy has been developed to support the systems and procedures laid out in the Safeguarding and Child Protection Policy in keeping with KCSIE (2022) and Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (2021).

What is child-on-child abuse:

All adults working at Bethany School should be aware that children can abuse other children and that it can happen inside the school, outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports of it.

Child-on-child abuse is most likely to include but is not limited to:

- bullying (including cyber bullying, prejudice based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as 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 violence, such as rape, assault by penetration and sexual assault (this may include an online element that facilitates, threatens and / or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment which may be stand alone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi-nude images and / or videos also known as sexting or youth produced sexual imagery
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation and hazing type violence and rituals (this 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).

Bethany School recognises that even if we are not receiving reported cases of child-on-child abuse, such abuse may still be taking place and that it is simply not being reported. It is also recognised that it is more likely that girls will be victims and boys perpetrators but that all

child-on-child abuse is unacceptable and it will be taken seriously by the School. Bethany School also recognises that as a boarding school, it has a context in which the risk of child-on-child abuse maybe greater and that those living within the boarding community should have a heightened sensitivity to identifying and dealing with any issues that may develop into any form of child-on-child abuse. It is also recognised that some pupils with special educational needs maybe more vulnerable to involvement in child-on-child abuse and as such should be monitored with greater awareness of safeguarding issues, including their vulnerability online.

This policy is Bethany School's overarching policy for any issue that could be construed as child-on-child abuse. They relate to and should be read alongside the School's Safeguarding and Child Protection Policy, Anti-bullying Policy and Behaviour Policy and any other systems and documentation that may relate to, or involve child-on-child abuse such as the Acceptable Use Policy.

This policy will be reviewed annually and updated in the interim as may be required, to ensure that it continually addresses the risks to which students may be exposed. The governor responsible for the Safeguarding and Child Protection Policy will also oversee the Child-on-child Abuse, Sexual Violence and Sexual Harassment Policy

This policy does not seek to identify pupils as a victim and / or perpetrator because Bethany School takes safeguarding to mean the protection of all children involved in any allegation including those alleged to have been abused and those alleged to have been the abuser of peers. In addition, any sanctioning that may be carried out will take into account the best interests of all the children within the context of the incident reported.

For the purposes of this policy all pupils of the school will be considered to be children and as such all pupils of the school will be treated according to this policy even if they have passed their 18th birthday. Although the starting point is that any response to child-on-child abuse should be the same for all pupils / incidents regardless of their age, there may be some different considerations in relation to, for example a child aged 18 involved with a child aged 13. It is noted that while this is the approach of Bethany School, outside agencies such as the Police will identify children as below the age of 18 year of age and those over this age will be treated as adults in terms of the law.

As this policy supports the Safeguarding and Child Protection Policy it is implicit that the Designated Safeguarding Lead would have a pivotal role in working with local safeguarding partners as laid out in the Safeguarding and Child Protection Policy.

1. Preventing child-on-child abuse

All members of the school community should be able to recognise behaviour's that would constitute child-on-child abuse. For staff this would come through training, for pupils from education and for parents through information shared by the school. In so doing, it is hoped that pupils will have a clear understanding of how their behaviour may have an impact on those around them and the consequences of behaviour identified as child-on-child abuse.

The Designated Safeguarding Lead will ensure all adults working with children at Bethany School a fully aware of what constitutes child-on-child abuse, sexual violence, and sexual harassment and how to respond to both incidents and disclosures. Adults working at Bethany

School must understand the importance of challenging inappropriate behaviours between peers, many of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in the worst case scenario a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report abuse.

Pupils will be expected to adhere to the Behaviour Policy and poor behaviour will be managed through the various systems identified within school policies, including the Anti-bullying Policy. The school promotes within its diverse community the values of kindness, respect and tolerance and these values will be promoted at all times. Opportunities to develop pupils understanding of these values arise both formally (such as in the PSHCE curriculum, the RSE curriculum, through the wider school curriculum, in assemblies, in tutor times and in Chapel) and informally (such as during duties and in dealing with individual reported incidents within the normal operation of the school).

Bethany School will promote:

- Healthy and respectful relationships
- An understanding of what respectful behaviour looks like
- An understanding of “consent”
- The dangers of stereotyping and the importance of equality
- Develop a sense of body confidence, self-esteem and self-efficacy
- Challenging prejudice behaviour and views
- An understanding that sexual violence and sexual harassment is always wrong
- A school culture in which sexual harassment is challenged and called out
- An understanding about what a healthy relationship looks like.

Being aware of the signs of child-on-child abuse:

Given the broad range of behaviours that may constitute child-on-child abuse it is important all adults working with children at Bethany School have an understanding of the wide range of signs that a child is suffering from abuse as laid out in the Child Protection and Safeguarding Policy. The monitoring of academic progress, behaviour and wider social interactions to identify potential worrying changes are critical in the early identification of concerns.

Signs that a child may be suffering from child-on-child abuse can also overlap with other indicating types of abuse and can include:

- Failing to attend school, disengaging from classes, or struggling to carry out school related tasks to the standard ordinarily expected
- Physical injuries
- Experiencing difficulties with mental health and emotional wellbeing
- Becoming withdrawn or shy; experiencing headaches stomach aches; anxiety and all panic attacks; suffering from nightmares; or a lack of sleep or sleeping too much
- Broader changes in behaviour including the use of alcohol and drugs
- Changes in appearance or changes in behaviour that are inappropriate for the child’s age
- Abusive behaviour towards others

- Use of sexualise language, becoming overly inquisitive about sex and topics related to sex such as Sexually Transmitted Diseases; or misuse of technology that suggests the viewing of pornography.
- Power imbalances within a relationship, such as appearing to be controlled within a friendship or friendship group or having a boyfriend / girlfriend who is much older or has some form of power imbalance.

Staff should be alert to any behaviour that might cause concern and to think about what that behaviour may signify, to encourage children to share with them any underlying reasons for their behaviour and where appropriate to engage with their parents so that the causes of the behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his / her age, staff should always consider whether an underlying concern is contributing to their behaviour.

2. Reporting child-on-child abuse

If any adult working with children at Bethany School is concerned that they may have identified child-on-child abuse or they have had a disclosure of child-on-child abuse then this should be reported to the Designated Safeguarding Lead as required in the Safeguarding and Child Protection Policy.

A “Green Form” should be completed and the Designated Safeguarding Lead will consider what actions should be taken in consultation with the pupil and other relevant staff (such as the Tutor, Head of Year or Housemaster / Mistress). All decisions, actions and where appropriate outcomes should be recorded on the “Green Form”. Where abuse is taking the form of bullying the Designated Safeguarding Lead may operate the Anti-Bullying Policy and the creation of a Bullying Aide Memoire.

Instances in which abuse has involved sexual harassment or sexual violence, it will be recorded separately and will be monitored by the Senior Management Team (as will instances involving abuse related to protected characteristics).

3. Sexual Violence and Sexual Harassment

It is important to note that not all children who are suffering from sexual violence or sexual harassment will see themselves as being abused, as they may believe that they are in a healthy romantic relationship. It is therefore important that judgements are made in line with not just the individuals view but with regard to that which is expected for their age and identifies the level of coercion and control that they may be being subjected to.

It is important that those making disclosures or who are identified as being at risk of being abused, are reassured that they are being taken seriously, that they will be supported and that they will be kept safe. Pupils should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should they ever be made to feel ashamed for their behaviour or making a report.

Bethany School will provide all pupils with methods of reporting sexual violence and sexual harassment but understand that even when not receiving any reports it is likely that this is

because of barriers to reports being made, and an approach will be taken that understands that such behaviours “**can happen here**”.

Bethany School has a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. Adults working at Bethany School will challenge physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia or pulling down trousers, flicking bras and lifting up skirts and will report such behaviour to the Designated Safeguarding Lead.

What is sexual violence?

For the purposes of this policy, when referring to sexual violence, we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: a person A commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person B with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by penetration: a person A commits an offence if: he/she intentionally penetrates the vagina or anus of another person B with a part of his/her body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual assault: a person A commits an offence of sexual assault if: he/she intentionally touches another person B, the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

*Within the context of Bethany School it should be clear the sexual assault covers a wide range of behaviour, and a single act of kissing someone without consent or touching someone's bottom / breasts / genitalia without consent **can** constitute sexual assault.*

Causing someone to engage in sexual activity without consent: a person A commits an offence if: he/she intentionally causes another person B to engage in an activity, the activity is sexual, B does not consent to engage with the activity, and A does not reasonably believe that B consents.

This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

What is Consent?

It is important that everybody within the Bethany community understands what is meant by “consent”. This is taught explicitly within the Relationships and Sex Education curriculum.

Within the context of Bethany School consent is viewed to be about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not to another, eg to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at anytime during sexual activity and each time activity occurs. Someone consents to vaginal or anal or oral penetration only if he/she agrees by choice

to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found at this link:

<https://rapecrisis.org.uk/news/what-consent-is-and-what-it-isnt/>

- A child under the age of 13 can never consent to any sexual activity.
- The age of consent is 16; it is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. The Designated Safeguarding Lead will be able to gain expert advice where appropriate where children of a similar age below 16 have been found to be taking part in consensual sexual activity, to identify if it is 'harmful'. This is explained further below in the section on Harmful Sexual Behaviour.
- **Sexual intercourse without consent is rape.**

What is sexual harassment?

For the purposes of this policy, when referring to sexual harassment we mean: unwanted conduct of a sexual nature that can occur online and offline and both inside and outside the school. Sexual harassment is likely to violate a child's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive or sexualised environment.

Sexual harassment may include but is not limited to the following:

- Sexual comments such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual jokes or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (which may also constitute an act of sexual violence), and displaying pictures, photos or drawings of a sexual nature
- Online sexual harassment. This may be stand alone or part of a wider pattern of sexual harassment or sexual violence; it may include consensual and non-consensual sharing of nude and semi-nude images and videos; sharing unwanted explicit content; upskirting; sexualised online bullying; unwanted sexual comments and messages including on social media; sexual exploitation, coercion and threats.

What is Harmful Sexual Behaviour?

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviours are developmentally inappropriate and may be harmful. When considering harmful sexual behaviour, ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there are more than two years different or if one of the children is prepubescent and the other is not. However, a younger child can abuse an older child.

Table 2 Continuum of sexual behaviours adapted from Hackett (2012) and Hackett, Holmes, & Stringer (2010)

Normal	Inappropriate	Problematic	Abusive	Violent
Behaviour is developmentally expected Socially acceptable Consensual, mutual and reciprocal Involves shared decision making	Single instances of inappropriate sexual behaviour Socially acceptable within the peer group Behaviour is in an inappropriate context Generally consensual and reciprocal	Behaviour is problematic and concerning Developmentally unusual or socially unexpected Consent issues unclear May lack reciprocity or equal power May include compulsivity	Victimising intent or outcome Misuse of power Involve coercion or force Intrusive Lack informed consent or victim unable to give consent May include expressive violence	Physically violent Highly intrusive Instrumental violence, physiologically or sexually arousing to the perpetrator Sadism

Hackett’s Continuum

When considering harmful sexual behaviour the Designated Safeguarding Lead will utilise the Kent Safeguarding Children Board: Kent and Medway risk assessment tool for sexually active young people.

4. Responding to reports of sexual violence and sexual harassment.

All adults working at Bethany School will report sexual violence and sexual harassment issues to the Designated Safeguarding Lead as required in the Safeguarding and Child Protection Policy, following all the procedures laid out and ensuring that any children who have allegedly been abused are made safe and know they are being taken seriously.

Adults working at Bethany School should consider the following:

- Is it possible to arrange for a disclosure to be made to them in the presence of the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead?
- Remember not to promise confidentiality at the initial stage of any disclosure as it is likely a concern will have to be shared further and that staff should keep any disclosures to as few other people as possible.
- Ensure that all children at risk can be made safe and enact immediately the measures to do so.
- Remember that the child or children will have chosen them as someone that they trust and that they may find this process challenging, and as such they should not put off hearing the disclosure as this will be the most important role at that time.
- Remember to be supportive, respectful and patient. Ensure you do not judge either with your words or with your reactions.
- Remember that the initial disclosure to a trusted adult may only be the first incident reported and a larger context of abuse may exist; and that trauma can impact memory so children may not be able to recall details or timelines of abuse.

- Keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
- Listen carefully, use the child's own language when making notes, be clear about boundaries, be clear about potential actions, do not ask leading questions, allow time for silences, and try to gain as full a picture as possible.
- Consider the best way to record the disclosure. Best practise may be to wait until the end of the disclosure but to then immediately write up a thorough summary using the language of the child.
- Record the facts that the child presents with no personal opinion and remember these notes may become part of a statutory assessment by children social care or part of a criminal investigation.
- Inform the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead as soon as is practically possible unless they are involved in the disclosure in which case, as per the Safeguarding and Child Protection Policy concerns should be reported to the Headmaster. If the concern relates to the Headmaster then the report should be passed to the Chair of Governors.

Further guidance can be obtained in “Sexual violence and sexual harassment between children in schools and colleges” 2021

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf

The Designated Safeguarding Lead will then consider the information provided and may seek further clarification in order to make decisions on the best way to proceed given the huge scope of behaviours that can be identified a sexual harassment, sexual violence or harmful sexual behaviour. Where reports involve children not attending Bethany School the Designated Safeguarding Lead will make contact with colleagues in other settings to ensure children in all settings are being made safe, and where reports are concerning online issues and behaviours, the Designated Safeguarding Lead will take all possible actions to ensure that measures are put in place to protect the children put at risk. The Designated Safeguarding Lead may choose to utilise different avenues such as the Anti-Bullying Policy or may feel the matter to be serious enough to be seeking immediate external referrals and or making a report to the police.

The Designated Safeguarding Lead will take account of advice given in the document “When to Call the Police” before engaging their services.

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

Where a report involves the sharing of nude or semi-nude images of children the Designated Safeguarding Lead will follow the guidance laid out in the latest UKCIS guidance and consider if devices need not be confiscated. Adults working at Bethany School must not request to view images as proof of an allegation.

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Once a disclosure has progressed to the Designated Safeguarding Lead, they will follow the Safeguarding and Child Protection Procedures has laid out in Section 4 in line with the Kent and Medway Safeguarding Children Board. Consideration should be given to if it is likely that a case may progress into the criminal justice system and the Designated Safeguarding Lead will consider seeking advice on witness support and the criminal process in general so that the children involved can receive the appropriate support.

The School should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims identity's and should react swiftly in the prevention of the spread of rumours of this nature by social media or by word of mouth.

The Designated Safeguarding Lead, along with other staff as required, will generate a risk assessment on a case-by-case basis taking into account:

- The protection and supported of the child or children alleging abuse
- The identification of others who may have been abused
- The protection and support of the alleged abuser(s)
- The protection of all other children who may become affected by the allegation.

The risk assessment will be recorded and be kept under review. The Designated Safeguarding Lead should engage with appropriate local services to seek advice which may help in the creation of the risk assessment such as The Education Safeguarding Service operated by “The Education People”. The School will remain committed to delivering education to all pupils involved.

The Designated Safeguarding Lead will take into consideration the wishes of the child or children alleging the abuse as well as acting in their best interests and will aim to ensure that the next steps following the allegation are agreed by all.

The Designated Safeguarding Lead will consider when to inform the alleged abuser(s) and their significant adults, such as parents. This may be determined by outside agencies but the School will always seek to be the point of first contact, if at all possible.

Following any report of sexual violence or sexual harassment the Designated Safeguarding Lead will carry out a review of all of the information and look to change policy, practise or both in order to ensure the School, is acting to protect it’s pupils effectively.

Likely actions:

There are four likely outcomes following allegations of sexual violence or sexual harassment:

1. It may be managed internally using existing systems within Bethany School.
2. Early help and Preventative Services support may be sought through the Digital Front Door referral system. Other related services such as Kent Community Health may also be sought.

3. A referral may be made to Children's Social Services via Kent Digital Front Door (or if a child has a home address outside of Kent through their own area equivalent such as the East Sussex MASH).
4. A referral may be made directly to the police in parallel with a referral to Children's Social Services, or equivalent. Where a report of rape, assault by penetration or sexual assault is made the starting point is that this should be passed onto the police. At this stage, Bethany School would contact the parents and carers of those involved unless there is a compelling reason not to do so or they are informed by external agencies that they must not. Information disclosed to the parents should be agreed with the police and or other outside agencies.

When police involvement does occur, the School would need to consider how to operate within any bail conditions and would carry out an additional risk assessment to identify how best to ensure the continuation of education for all those involved.

At the end of any criminal process, if a child is convicted or received a caution for a sexual offence Bethany School will update its risk assessment and ensure relevant protections are put in place for all pupils at the school, if additional changes are required. It would be for the School to work out how best to protect any pupil returning to school following a conviction. Where cases are classified as 'no further action' or there is a 'not guilty verdict' Bethany School would seek to continue to offer support to all those involved for as long as is necessary.

If an allegation is determined to be false or malicious the Designated Safeguarding Lead, along with the Headmaster will need to consider how best to support the pupil(s) involved in making the allegation and will need to consider any appropriate disciplinary action.

Disciplinary action can be taken against alleged abusers whilst other investigations by the police and/or Children's Social Services are ongoing however Bethany School is likely to wait until a formal outcome is obtained prior to any decision on disciplinary actions to be taken.

When deciding on ongoing responses following allegations of sexual violence or sexual harassment the Designated Safeguarding Lead will take account of the advice given in "Keeping Children Safe in Education" 2021 and "Sexual violence and sexual harassment between children in schools and colleges" 2021 (sections on safeguarding and supporting the victim and safeguarding supporting the alleged perpetrators and children and young people who have displayed harmful sexual behaviour).

Documents supporting the content of this policy:

Keeping Children Safe in Education
Working Together to Safeguard Children
Relationship Education, Relationships and Sex Education and Health Education.
UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people
When to Call the Police

Useful specialist organisations and sources of information:

Barnardo's
Lucy Faithful Foundation
Marie Collins Foundation
NSPCC
Rape Crisis
UK Safer Internet Centre
Anti- Bullying Alliance
CEOP – Thinkuknow
Childnet
Parentzone.

Sexual harassment Aide Memoire Form

Pupil victim:	DoB: Year:
----------------------	---------------------------------

Your name & position:	Date of incident / concern: reported
----------------------------------	---------------------------------------------

Sexual harassment:

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

Sexual harassment may include sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.

Sexual jokes or taunting.

Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and/or displaying pictures photos or drawings of a sexual nature. Note where touching is involved staff should consider if this crosses the threshold of sexual violence.

Online sexual harassment may be stand alone or part of a wider pattern of sexual harassment and/or sexual violence and may include: non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages including on social media and/or sexual exploitation coercion or threats.

Sexual Violence

Sexual violence in a child-on-child context would fit one of three categories

Rape: a person commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person with his penis when the other person has not given consent and it is not reasonable to believe that consent was given.

Assault by penetration: a person commits an offence if s/he intentionally penetrates the vagina or anus with a part of his/her body or anything else, the penetration is sexual and non-consensual and it is not reasonable for it to have been believed consent was given.

Sexual assault: a person commits an offence of sexual assault if he/she intentionally touches another person, the touching is sexual and the person does not consent to the touching and it is not reasonable to believe the alleged perpetrator would reasonably believe that consent was given.

Incident / Concern (who, where, when, what, consider level / context of consent):

What makes this incident meet the threshold for sexual harassment / sexual violence?

How did that make you feel?

How do you think we can resolve this problem?

Action taken:

Signed:

Date: