How schools are addressing harmful sexual behaviour: Findings of 14 school audits

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This article considers how schools are addressing harmful sexual behaviour occurring between students. In the context of policy and school inspection, driven by student disclosures of sexual harm, schools are being required to evidence responses to sexual harassment and abuse within and beyond school. Presenting findings from 14 school audits the article highlights evidence of the levers where schools claim they are achieving well and those where they self-assessed lowest. Findings are based on four research assessments, drawn from focus groups, interviews, surveys, observations and reviews and 10 audits where the school completed the assessment. The findings evidence that schools more readily develop statutory policy processes and are less equipped to address cultural elements driving harmful and unsafe environments. The findings have implications for how schools are supported to address sexual harm and what drives changes in this area.

Keywords: Audits; Inspection; Safeguarding; Sexual Harassment; Sexual harm

Introduction

Student disclosures of sexual harm in schools in the UK and internationally have highlighted the pervasiveness of sexual harm within and outside of schools between students (Everyone's Invited, 2021, Ofsted, 2021b, Girlguiding, 2017). Sexual harm such as pressure to share sexual images, unsolicited sexual imagery online, non-consensual images shared on social media, unwanted touching and groping in the corridors, controlling behaviour in relationships and sexual assault have become so prevalent that students report that they are normalised to the extent they feel there is little point seeking help (Allnock and Atkinson, 2019, Ringrose et al., 2021, UK Feminista and National Education Union, 2017). Increasing awareness of the extent of sexual harm in schools, coupled with a greater emphasis from policy makers and inspectorates, means that schools are under increasing pressure to address sexual harm. While great emphasis is often placed on what schools aren't doing and the need to develop 'whole-school' approaches, there is limited emphasis on the individual factors which make up these

approaches and the areas where schools can improve responses to sexual harm. Two key terms are used in this article; harmful sexual behaviours (HSB) refer to the range of sexual behaviours children display that may be developmentally inappropriate, abusive and violent (Hackett, 2014). Sexual harm is a broader term used to encompass HSB and refer to the wider social and cultural impacts that these behaviours can have. This article presents findings from 14 school assessments used to identify how schools are addressing sexual harm. Evidence from this points to the division between policy and process driven responses and those that tackle the cultural context which underpins harm. We argue that responses to HSB need to better understand factors driving harmful cultures coupled with a policy framework that places emphasis upon these. We begin with an overview of current school policy and the cultural context of sexual harm in schools before presenting the methodology and findings.

Policy responses

In 2016 the Women and Equalities committee, a UK House of Commons Select Committee, found that sexual harassment and violence in schools in England was a daily part of many girls' school lives. Their inquiry recommended developing national guidance promoting whole-school approaches to address sexual harm, and that school inspection bodies assess how well schools are "recording, monitoring, preventing and responding" to incidents of sexual harm (House of Commons, 2016, online). In 2017, the Department for Education published non-statutory guidance to schools on *Sexual violence and sexual harassment between children in schools and colleges* (Department for Education, 2017) and in 2018 England's statutory guidance *Keeping Children Safe in Education* was updated to include greater reference to "peer-on-peer abuse" and elements from the guidance which were to become statutory (Department for Education, 2018). In 2021, prompted by the movement

Everyone's Invited, Ofsted published the findings of their review of sexual abuse in schools and colleges (Ofsted, 2021b). The findings of which suggest that schools "should assume that sexual harassment and online sexual abuse are happening in their setting, even when there are no specific reports, and put in place a whole-school approach to address them" (Ofsted, 2021b, online).

Recent changes in national policy and inspection frameworks, which outline standards of practice for schools in relation to safeguarding, do acknowledge school cultures as associated to incidents of sexual harm occurring in settings (Department of Education 2018). The focus, however, is largely on subcultures operating amongst students rather than other factors, such as cultural norms operating amongst school staff, school ethos or curriculum messages that may shape school cultures (Firmin 2018). England's statutory guidance *Keeping Children Safe in Education 2021* does indicate that certain staff responses to sexual violence can influence cultural norms amongst students:

> 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 worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. (Department of Education 2022, Page 12 para 34).

The guidance, however, does not acknowledge any cultural factors that may influence school staff responses and provides limited specific guidance or quantifiable measures on how to assess school cultures and how to respond once you have (Firmin, Lloyd et al. 2019).

National safeguarding procedures governing school responses to sexual harm are still largely focused on management of individual incidents through referrals to local authority safeguarding partnerships and work with individual students and families (Firmin, 2018). Schools are legally obligated to refer incidents where a child is harmed, or at risk of harm, to children's social services (Department for Education, 2022). However, policies and inspection

frameworks do not centre the creation of school norms or cultures when outlining or assessing school responses to sexual violence amongst students in the same way.

School inspection frameworks play a significant role in shaping school priorities and responses. Research demonstrates that school inspection processes create a culture of comparison, competition and judgement where the stakes are high for schools to perform favourably (Colman, 2021). Colman (2021) found a culture of "inspection readiness" operating in schools, where schools are routinely performing inspection frameworks regardless of if they are in an inspection cycle or not. Schools have reported that this prominent focus on conforming to inspection frameworks (focused on grades and curriculum) has an impact on the schools' ability to do other things (Perryman et al., 2018) such as respond to the impact of social deprivation, and student needs in relation to this (Jones et al., 2017, Perryman et al., 2018, Colman, 2021).

Cultural barriers and enablers

Research into peer-to-peer sexual behaviour has demonstrated the significant influence school cultures have on informing student behaviour (Cowie, 2011, Ringrose et al., 2013, Conroy, 2013, Thapa et al., 2013, Lloyd, 2019, Firmin, 2020, Walker, 2020). A factor most consistently identified within the research is how the school environment appears to exert powerful influences on young peoples' ability and willingness to disclose sexual harm experienced or report sexual harm on behalf of others (Haywood and Mac an Ghaill, 2012, Allnock and Atkinson, 2019, Brown et al., 2020). Research into sexual harm in schools, for example, has demonstrated cultures of victim blaming and 'snitching' have been shown to prevent student disclosure (Ringrose et al., 2013, Gillander Gådin and Stein, 2019, Allnock and Atkinson, 2019, Altinyelken and Le Mat, 2018).

In relation to sexual harm specifically, language used within schools and the ways that

these behaviours are challenged, by both staff and students, can inform school cultures (Firmin et al., 2019, Contextual Safeguarding Network, 2021). For example, school curriculum messages, ethos and the extent that a school promotes healthy and positive relationships, gender equality and acceptance of difference can shape school culture and safety (Conroy, 2013, Ringrose et al., 2013). Schools that proactively seek to understand the nature and prevalence of sexual harm occurring in the school are able to address harmful behaviours and attitudes (Firmin et al., 2019). In the absence of a true understanding of what is happening in schools, research has indicated that identification of harm can instead be based on staff perception and attitudes relating to demographic profile of victims and instigators of sexual harm (Rahimi and Liston, 2011, Franklin et al., 2015, Altinyelken and Le Mat, 2018). High prevalence of sexual harassment behaviours increases the risk that those behaviours are considered normative to the point that it is accepted and in some case expected (Gillander Gådin and Stein, 2019, Walker, 2020).

Finally, research highlights the importance of peer influence and support in relation to sexual harm (Storer et al., 2017, Firmin, 2020). Peers have been shown to act both protectively and harmfully (Cowie, 2011, Conroy, 2013, Gillander Gådin and Stein, 2019, Storer et al., 2017). Barriers that prevent young people intervening within the school environment include lack of student power and students' pessimism about the school's capacity to stop the bullying or violence (Storer et al., 2017). Therefore, the extent to which a school empowers students to support each other in relation to incidents of sexual harm and harnesses positive and pro-social peer influence in the school setting can challenge or impede safe culture creation (Firmin et al., 2019).

Methodology

The findings presented here are from a two-year study into HSB in 14 schools in England undertaken between June 2018 and May 2020 (Lloyd et al., 2020). The research built upon a previous study entitled Beyond Referrals which aimed to identify multi-agency enablers and barriers to addressing HSB in schools (Firmin et al., 2019). The findings of this first study were used to develop a self-assessment audit toolkit for schools and multi-agency partners to audit how they address HSB (Contextual Safeguarding Network, 2021, Firmin et al., 2018). The second study presented here aimed to:

- Identify levers where schools self-identify strengths and challenges in addressing HSB
- Test and implement the self-assessment toolkit to identify its effectiveness in supporting schools to audit their response to HSB

Research methods

To meet these aims, the research team sought to recruit four schools across four multi-agency partnerships in England (n=16) who would either support the research team to complete the assessment on their behalf (tier one) or complete the self-assessment themselves (tier two). An expression of interest was created whereby four schools within a local authority applied together with a lead from the multiagency. In total 38 schools applied across ten multi-agency partnerships. Schools were shortlisted based on a range of criteria including ensuring a range of types of schools, secondary age students, geographical variation and spread and previous engagement with the research team (to ensure the sites had not previously engaged). Following shortlisting 16 schools were selected across four local authority areas. The final 16 schools included: six high schools, five education settings for children with complex physical

and learning needs, two pupil referral units, one all-boys school, one academy school and two faith-based (some schools crossed multiple categories). All schools were secondary provision.

Self-assessment audit tool

The 16 schools were grouped into two method categories: 'research assessment' and 'self-audit'. Each local authority area comprised of one school where the research team conducted the research assessment (tier one) and three schools that completed a self-assessment (tier two). The original audit tool developed as part of study one is a traffic-light tool covering four categories and within these a number of levers (indicated in brackets) including 'structures and systems' (7), 'prevention' (6), 'identification' (5) and 'response and intervention' (10). The tool is supported by a range of audit resources to allow schools to assess themselves against each lever. The audit tool requires schools to consider if they meet the requirements of 'green', 'amber' or 'red' and to record the findings in a supporting self-assessment template. For tier two schools, schools were required to conduct the school audit themselves, utilising a range of methods developed as part of the first study, submit a completed audit to the research team and participate in a follow-up interview. For tier one schools the research team utilised a range of research methods that mirrored those used in the self-assessment. Details of the research assessments including the methodology and findings from interviews with students are published elsewhere (Lloyd and Bradbury, 2022, Lloyd et al., 2020). The research team also aimed to conduct one interview with a member of staff responsible for managing cases of HSB in each of the four Local Authorities. Two schools did not complete the self-assessment and two members of the local authority were unavailable for interview. As this coincided with the Covid-19 outbreak it was decided not to further pursue them. Table one provides and overview of all the methods completed at the

two tiers.

Research Element	Method	Number	Total participants	Recording
Tier one: Research assessment	Focus group with students	9	45	Written notes and audio
	Focus group with staff	9	47	Audio recording
	Survey sessions with students	8	115	Paper surveys entered into Qualtrics
	Surveys with parents	2 schools	80	Online surveys using Qualtrics
	Interviews with staff	13	17	Audio recording
	Designated Safeguarding Lead interviews	4	5	Audio recording
	Tour and observations of school	4 school tours	N/A	Observation template
	Review of behaviour and/or safeguarding logs	4 schools	N/A	Case recording template
	Reviews of policies and procedures	4 schools	19 documents	Policy review template
Tier two: Self-assessment	Self-assessment	14 self-assessments	14 schools	Completed paper document
	Interviews with completing staff member	10	10	Audio recording
Tier one and Tier two	Interviews with multi-agency contact	2	2	Audio recording

Table one: research methods

Research Process and ethics

Ethical approval was gained through the University of Bedfordshire's ethics process. Consent to participate was granted via the Head Teacher and in most cases the audit was completed by the Designated Safeguarding Lead (DSL). Individual consent was sought via staff, students and parents (where required) for individual elements of the research.

Analysis

Analysis of data fell across two key phases. Individual school findings were sense checked with staff, students and the DSL. Data across the four schools was initially analysed in NVivo 12 using the self-assessment audit levers as an analytical framework. For an overview of all codes see Table Two in the findings section. Tier one school data was independently coded and scored by three members of the research team. To score the coded data the researchers decided if the evidence pointed to 'red', 'amber' or 'green' for each lever. Where there was uncertainty, two members of the team considered the evidence together and decided on a score.

Phase two consisted of entering the results from both tier one and tier two schools into Excel. The results of the traffic-light system were converted into numbers whereby green = 2, amber = 1 and red = 0. Three types of analysis were conducted. First,
the sum and mode of each lever was calculated. Secondly, the four categories were ranked. The total points received for each category was calculated as a percentage to identify which categories scored highest. Finally, the total points for each school were calculated along with the average and standard deviation for these to ensure that the scores for tier one and tier two schools did not vary significantly. Two levers were not completed in one school and one in another (ethos, physical environment and ethos). The research team decided to score these as 'red' as this did not affect the total scores and suggested a lack of work by the school in this area. Findings from both stages were then sense-checked with the research advisory group for this project which consisted of policymakers, voluntary and community sector organisations, educators and academics.

Limitations

There are five limitations of note. Firstly, the majority of findings reported come from

schools that self-assessed their response to HSB. In this sense the findings cannot be interpreted as evidence of how *well* schools are addressing HSB in comparison with one another, but instead are indicative of the areas they report to be doing well or need further support. However, drawing together tier one and tier two data has allowed for some sense-checking of findings. Secondly, schools were required to apply to be part of the study. Participating schools therefore had the willingness to want to learn and develop their response to HSB. The sample is unlikely to be representative of the wider range of approaches schools take. Thirdly, while the tier two schools were provided with a range of assessment methods, and the template required them to evidence how conclusions were drawn, it appears there were variations in how methods were carried out and who was engaged. However, the aim of the tool is to guide schools towards the types of activities and actions that can address HSB, not to inspect them in comparison to others. Comparison between schools in this paper is only done to allow for analysis of trends and themes. Understanding where schools have not readily engaged with the tools is helpful for identifying where we can adapt resources to provide further support. Fourthly, the levers are not equally weighted. There are levers where it is considered that the negative impacts of a 'low score' may be more greatly felt than others. Finally, the tool is designed to be strengths-based rather than deficit based and requires starting at 'green' so may reflect a positive approach. We address a number of these limitations in the findings and conclusion.

Findings

Analysis suggests that schools self-assessed or were assessed as green for the majority of levers. The mode for 64% of levers was 2 indicating green, 10 levers had a mode of one indicating amber and no levers received a mode of 0 for red. However, no lever was marked as green by all schools and red was allocated in 19 occasions. Table Two outlines the total

score and mode for each lever, the category that these fell within and a short description. The levers are ranked from highest scoring to lowest scoring.

Code	Lever	Description	Total Points	Mode	Category
1	Holistic safeguarding response	HSB response is integrated into the safeguarding strategy	27	2 - Green	Structures and systems
2	Wellbeing of students	Schools support the welfare of students affected by HSB	27	2 - Green	Response
3	Incident referral	Incidents of HSB are referred to social care	27	2 - Green	Response
4	DSL capacity	Extent that the DSL role is fully protected	26	2 - Green	Structures and systems
5	Referral pathway (internal)	Referral pathways are in place internally	26	2 - Green	Structures and systems
6	Referral pathway (internal)	Staff make use of referral pathways internally	26	2 - Green	Prevention
7	Response to incidents	Responses to victims and instigators of HSB take a welfare approach	25	2 - Green	Response
8	Partnership inputs (response)	The school uses multi-agency interventions for incidents of HSB	24	1 - Amber	Response
9	Physical environment	Assessments of locations are taken following incidents	24	2 - Green	Response
10	Staff motivation	Staff feel empowered to intervene in incident of HSB	23	2 - Green	Response
11	Policy framework	Schools respond in accordance with national policy	23	2 - Green	Response
12	HSB strategy	The school has a HSB policy in place	22	2 - Green	Structures and systems
13	Engagement in local context	The school understands the local context and engages with multi-agency partners	22	2 - Green	Structures and systems
14	Response to trends	Curriculum and policies reflect trends and incidents	22	2 - Green	Response
15	Partnership input (structures)	Drawing upon resources and training from multi-agency	21	2 - Green	Structures and systems
16	Ethos	School promotes gender equality and positive relationships	21	2 - Green	Prevention
17	Response to local concerns	School responds to trends flagged by the multi-agency informing prevention	21	1 - Amber	Prevention
18	HSB Trends	HSB incidents for peers are flagged and recorded on systems	21	2 - Green	Identification
19	Prevention and incident management	Students and staff are aware of interventions to address HSB	20	1 - Amber	Prevention

20	Relationships and Sex Education (RSE)	Embedded across all years and informs ethos	19	2 - Green	Prevention
21	Disclosure options	Students are offered, and make use of, a range of options	19	2 - Green	Identification
22	Cultural context	Extent that victim-blaming and gendered language is in use	18	1 - Amber	Identification
23	Thresholds	Thresholds are understood an consistent with multi-agency	18	1 - Amber	Response
24	Parental engagement	Parents proactively engaged to raise awareness	17	1 - Amber	Structures and systems
25	Training	Extent that all staff receive training on HSB	17	1 - Amber	Prevention
26	Definition	Definition of HSB consistent with that of multi-agency	17	1 - Amber	Identification
27	Resources	HSB resources aligned with multi-agency	17	1 - Amber	Identification
28	Peer support	Resources are in placed to promote positive peer relationships	14	1 - Amber	Response

Table Two: Overview of points, mode and ranking per lever.

Analysis was also undertaken to calculate which category schools assessed themselves as scoring the highest. The sum of the total levers for each category were calculated as a percentage of the total points available for that category (as some categories had more levers):

Category	Percentage
Systems and structures	82%
Prevention	73%
Identification	65%
Response	81%

Table three: total percentage scored for each category

While it was not the aim to analyse how 'well' individual schools did in comparison to one-another, the average scores of the schools were calculated to provide some measure of variation between tier one and tier two schools. I.e., to ensure that tier two schools hadn't self-assessed themselves much higher than those where the research team completed the assessment. This was not the case. Of a possible 56 points, the average score for a school was 43.14 with a standard deviation of 6.51. The four schools in which the research team conducted the assessment scored 43, 44, 38 and 53. It is only this last school that scored higher than the standard deviation.

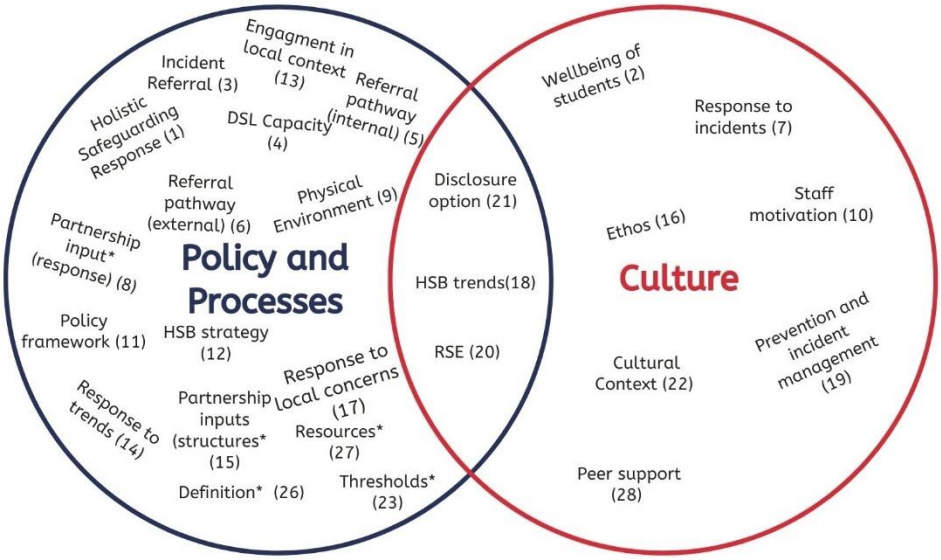
Schools scored highest in the categories of 'structures and systems' and 'response', achieving over 80% of the possible points for both these categories. Except for the lever 'partnerships inputs (response)', levers 1-14 (table two) received a mode of 'green'. What is notable is that the areas where schools consistently achieved 'green' are those that relate to the internal school processes and procedures as opposed to the broader school culture. Within the top 14 levers only three (wellbeing of students, response to incidents & staff motivation) did not directly assess procedural elements of school responses.

All the levers related to the category ‘identification’ and all but one of the levers in the category ‘prevention’ fell within the lowest scoring 14 levers. While the 14 lowest scoring levers presented less distinction, some themes were evidenced. While five of these levers are also procedural in that they relate to the policy approach taken by schools, they are linked to factors related to the external policy context (Partnership inputs (15), response to local concerns (17), thresholds (23), definition (26) & resources (27)). These levers require schools to engage with, and are impacted by, the external multi-agency response to HSB. Therefore, schools are required to have a relationship with the multi-agency beyond referring incidents out. The remaining nine levers (ethos (16), HSB trends (18), prevention and incident management (19), relationships and sex education (20), disclosure options (21), cultural context (22), parental engagement (24), training (25) & peer support (28)) align much more closely with the broader culture and approach the school takes to HSB. We discuss these findings below.

Discussion

Analysis of the school audits paints a story of two halves in how schools respond to sexual harm. While most schools scored ‘green’ for the majority of levers the detail of the analysis suggests that there is a clear distinction between where they assessed as doing ‘well’ and the areas that need development. This divide appears to fall between activities which are policy and process driven and those that relate to broader school cultures. Figure one provides a representation of this distinction. Levers marked with a * indicate those that are related to the external multi-agency context.

Figure one: Levers



Policy and processes

The most notable feature of the levers related to policy and processes is that the majority of these are statutory requirements as outlined in *Working Together* and *Keeping Children Safe in Education* (Department for Education, 2018, HM Government, 2018). Furthermore, a large proportion of these are factors outlined within Ofsted's inspection framework for inspecting safeguarding (Ofsted, 2021a). Factors such as having a policy framework that includes bullying, sexual harassment, abuse and violence, record keeping, referral processes to social care, trained DSLs who are known to staff and protecting victims and "perpetrators" are all explicitly detailed as elements that schools may be inspected upon. While we do not claim to have a direct influence to this, the first study was designed to inform Ofsted inspection frameworks and all Ofsted school inspectors have been trained on the tools (Firmin et al., 2019) A second feature of this group is that many of these, as detailed in the audit guidance, are quantifiable. Schools either have a child protection policy that includes HSB, a referral

system and a definition, or they don't. The nuances of these are not explored within the audit tool beyond the traffic-light system. As such it is likely to be easier for a DSL to consider these as 'green', even if the detail of these requires improvement. Thirdly, the levers indicated as relating to policy and processes overwhelming lean towards those related to *an incident*, or one-off occurrence of HSB. While it is likely that there will be isolated incidents of HSB it appears that schools are overwhelmingly more prepared for incidents than the more widespread micro-aggressions of sexual harm that may be occurring.

Finally, policy and process levers where schools self-assessed lowest were related to processes in the multi-agency. Schools are not directly responsible for these. The findings suggest that barriers exist between multi-agency responses and those of schools. The evidence of which the audit is based upon continues to emphasise the importance of united approaches between schools and multi-agencies particularly in their ability to tackle HSB and other forms of extra-familial harm which may not directly occur within the school grounds but involve students (Firmin et al., 2018).

Culture

The divide between features of school responses to HSB which are related to policy and processes and those that relate to culture makes clear that schools struggle to address the wider social and cultural aspects of sexual harm in schools. We consider five reasons for this.

Firstly, while many of the features of policy and processes are quantifiable measures, levers pointing to culture are often more intangible and qualitative. While the school audit pack included extensive resources to understand these, such as a complete guide on how to hold a student engagement session with scripts and examples, we did not ask schools to *prove* that they used these methods. Schools were asked to note which methods they used to complete the assessment, but audit analysis suggested that some schools marked the

engagement they already routinely used rather than sessions that were held for this specific purpose. The interviews conducted with schools completing the self-assessment suggested that only a minority held groups with students to discuss HSB. Two options are possible then for schools scoring lower in this area; schools know that the school culture is harmful but don't know what to do about it or schools are reluctant to speak to students about sexual harm and therefore don't understand the drives of HSB in their school. It's likely that a mix of these is true, the former points to a wider challenge of how to tackle the harmful cultures which influence behaviour, the latter suggests that schools may be inhibited by the confidence or means to engage students in discussions about HSB.

Secondly, aside from levers relating to the multi-agency, policy and process levers measured factors that the school had a degree of control over: their strategy, the recording systems etc. However, analysis of the levers related to culture indicates challenges beyond the school context itself. It is not only schools that are struggling with the need to tackle sexual harm, we see this in many other organisations and institutions such as the police (Brown et al., 2019), on university campuses (Bondestam and Lundqvist, 2020) and within the army (Godier and Fossey, 2018). Many sectors struggle to tackle the harmful impact of misogyny and patriarchal structures on women. The negative impact of these cultures may seem 'too big' for schools to tackle alone.

Thirdly, while we have drawn a distinction between factors that are procedural and those that are cultural, there is a strong relationship between these. Many levers could arguably sit between this group. *Disclosure options*, *RSE* and *HSB trends* require something quantifiable to be in place (options for disclosure, curriculum and mechanisms to measure HSB) but ask in turn for this to inform culture; what barriers exist to the disclosure options? Does the culture of the school inform the curriculum and are trends measured to inform

prevention? Seeing the audit as a process and not an assessment would allow schools to interrogate these processes.

Fourthly, it is notable that all schools scored the lowest for the lever *peer support*. Only three schools scored themselves as "green" for this lever and three schools scored themselves as "red". This lever requires schools to have resources to support young people to support each other and to tackle negative peer cultures which discourage disclosure. While there is an emerging body of literature and policy guidance recognising the negative impact that peer influence can have within schools relating to HSB (Ofsted, 2021b, Allnock and Atkinson, 2019, Firmin, 2020) this suggests that either schools are aware of the influence of this and don't take steps to address it, or are not aware of the role this factor plays in addressing sexual harm. Analysis across the two studies suggest both reasons are possible.

Finally, while the audit toolkit allows schools to have an indicative "score" the individual levers or categories are not themselves weighted. This means that the points available for having a definition in place for HSB are the same as the *amount of* and *use of disclosure options*. Analysis of tier one schools helps to evidence the impact of this. A tier one school scored a total of 43 points achieving the most points in relation to policies and processes, and lowest in those related to culture. However, evidence drawn from the assessment notes that this school had some of the highest prevalence of HSB (compared to the three other tier one schools), the most significant barriers to disclosure and harmful norms were driving harm. But this school had policies in place and an experienced DSL team in whom staff had confidence. Therefore, while schools may be self-reporting as doing well in relation to policy and processes this can be undermined if the culture of that school is harmful. In this sense school culture has a much greater influence on creating or preventing safe environments. We turn now to the implications of this research.

Conclusion

This study set out to understand how schools are responding to HSB in schools, and, test the self-assessment toolkit. The gap between the relative strengths of school processes and policies related to HSB and the challenge of tackling harmful cultures provides insights into where schools, policymakers and inspectorates should direct attention. We consider four implications of the findings.

Firstly, testing the self-assessment toolkit facilitated us to consider its effectiveness in supporting schools to audit their own responses to HSB. Evidence from this study and examples captured from policy and practice suggest that schools do find the toolkit helpful in guiding them to consider the different elements that can enable responses to HSB. Since the publication of the original toolkit, it has been cited in multiple places. For example, in Ofsted's review of sexual abuse in schools, the toolkit is cited first in the section 'what does good practice look like?' (Ofsted, 2021b). Statutory schools guidance *Keeping Children Safe in Education* (Department for Education, 2022) cites the toolkit throughout as a resource for schools, as does Welsh guidance on responding to HSB in schools (Gov.Wales, 2020). The toolkit is also recommended by a number of national organisations including the NSPCC (2022) and The Lucy Faithfull Foundation (2021). Additionally, it is cited in several local authority policy documents and school policy documents. The continued reference to the resource in updates suggests that schools find it useful.

Secondly, while schools are finding the toolkit of use, the findings of this paper present a challenge. Could the tool do more harm than good if, as these results suggest, they focus their attention on developing policy and processes and less on tackling the culture underpinning this harm. It is helpful to note that it has only been through the process of this research that such a divide has surfaced. This evidence has allowed us to update both the tool but also our overall training, resources, and guidance we give to schools and policymakers on

the issue. These findings have informed changes to the audit toolkit. Alongside changes to wording and guidance a fifth category *cultural context* has been created which includes levers related to *prevalence* (steps taken by the school to identify rates of HSB), *student disclosure* (if students use the disclosure options available and what barriers exist), *peer support, ethos* and *language and challenging normalisation* (how the school challenges harmful attitudes). These levers signify some of the positive steps that can be taken to challenge harmful school cultures. We hope these changes will address some of the limitations of the audit and support the identification of further factors related to culture in addition to the extensive training and presentations we give to schools on the issue of culture.

Thirdly, while schools in this study did self-report as doing overwhelmingly well for many levers, students still spoke about their experiences of sexual harm as a daily occurrence (for further details see (Lloyd and Bradbury, 2022)), echoing much of the research at the start of this article. The aim of the audit was not to give schools a score, but instead, we want the process to support schools to understand their own cultural context. It is for this reason that we have provided guidance on how to engage students so they may identify prevalence themselves. However, it is possible that schools – driven by a culture of punitive attainment and inspections framework (Jones et al., 2017, Perryman et al., 2018, Colman, 2021) may often be focused on the end 'result' rather than the messiness of the culture driving this. While Ofsted's current focus on the issue of safeguarding may support schools engaging in these activities further work is needed to support schools to engage in a broader depth of activities that can surface the wider whole-school context of HSB (Bragg et al., 2022).

Finally, the hesitance or limited time schools had to engage students in discussing HSB as part of this audit is notable. The findings suggest that schools do not understand, or have the time, resources or impetus, to understand school culture. While policy and processes may seem objective, culture can seem 'too big' or intangible. The fact that schools are

scoring highest in relation to levers which are quantifiable statutory measures emphasises the significance of inspection to schools. In a context of resource limitations schools prioritise certain elements and may be restricted in their opportunities to take steps beyond 'measurable' aspects of processes and policy (Jones et al. 2017, Perryman, Maguire et al. 2017. Colman 2021). As long as we fail to address how HSB is driven by culture, we won't address sexual harm in schools. While not every element of culture can be broken down or measured steps should be taken to support schools to understand the levers of this.

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