

Al-Madani Independent Grammar School (AMIGS) for boys



AL-MADANI
INDEPENDENT
GRAMMAR SCHOOL

Safeguarding Policy

Designated Safeguarding Lead (DSL): Nyron Gonzales
Deputy Safeguarding Lead (DDSL): Mr Andrew Ramsey
Deputy Safeguarding Lead (DDSL): Mr Manzoor Sadiq

In this policy you will find:

- Child Protection Policy as hereunder
- Whistleblowing Procedure Appendix 4 p21

“Through their day- to-day contact with students and direct work with families, education staffs have a crucial role to play in noticing indicators (appendix 2) of possible abuse or neglect, and in referring concerns to the appropriate agency, normally the Directors of Children’s Services.”

This document sets out how organisations and individuals should work together to safeguard and promote the welfare of children and young people in accordance with the Children Act 1989 and the Children Act 2004 and Keeping Children safe in Education DfE guidelines 2022, with reference to working together to safeguard children. It is important that all practitioners working to safeguard children and young people understand fully their responsibilities and duties as set out in primary legislation and associated regulations. The school’s arrangements will have regard to the DfE guidance, the latest of which has come into force on September 1, 2022. This policy recognises and makes provision for the stakeholders appropriate safeguarding and child protection training at induction, and then at regular intervals.

The procedures outlined by Slough Local Safeguarding Children Boards (LSCB) take precedence over any other school procedures.

Purpose of this Child Protection Policy

This Child Protection Policy forms part of a group of documents and policies that relate to the safeguarding responsibilities of the school.

This policy should be read in conjunction with the following policies:

- Safer Recruitment, Behaviour, Physical Restraint and Use of reasonable Force, Anti-Bullying, Staff Code of Conduct, and the E-Safety and Use of ICT.

This whole AMIGS Child Protection Policy provides clear direction about expected codes of behaviour and responsibilities of staff, volunteers and governors in terms of safeguarding students. It also makes explicit AMIGS commitment to the development of good practices and sound procedures. This ensures that child protection concerns and referrals may be handled sensitively, professionally and in ways that support the needs of the child.

Overview

AMIGS Mission statement:

AMIGS is established to provide excellent secondary education in a safe, secure and happy environment with an Islamic ethos.

Ensure that students know that there are adults in the school whom they can approach if they are worried.

Ensure that students who have been abused will be supported in line with a child protection plan, where deemed necessary.

Include opportunities in the curriculum for students to develop the skills they need to recognise and stay safe from abuse.

Consider how students can be taught about safeguarding, including online and through teaching and learning opportunities.

AMIGS recognises the contribution it can make to protect children and support students in this educational establishment.

There are two main elements to our Child Protection Policy.

- Making arrangements to ensure all reasonable measures are taken so that harm to student welfare is minimised.
- Making arrangements to take all appropriate actions so that any concerns can be addressed and working with agreed local policies and procedures in partnership with local agencies.

This policy applies to:

- (a) All members of the AMIGS community (governors, teachers, admin staff and other users of our school).
- (b) To all adults from outside AMIGS who have close contact with students (mentors, careers officers, support teachers, social service department).

School Staff and Volunteers

All adults working with or on behalf of children have a responsibility to protect children. There are, however, key people within AMIGS and the LA who have specific responsibilities under Child Protection Procedures. The names of those carrying these responsibilities for the current time are listed on the cover sheet of this document.

Abuse of children in attendance at AMIGS is most likely to be first noticed by staff. Teachers bring a number of particular advantages to the recognition of child abuse, i.e.

- They have regular and frequent opportunities to observe children, including opportunities to observe changes in their behaviour.
- They have an on-going relationship with children, who may confide in them about difficulties that they are experiencing.
- They have knowledge of the wide range of behaviour likely to be seen in children of a particular age.
- They have opportunities to observe the response of a group of children to particular situations. They will, therefore, be sensitive to surprising or unusual responses.

To enable staff to be equipped to recognise possible signs of safeguarding issues, and be aware of their responsibilities in terms of cultivating a culture of 'it can happen here', recording concerns, making referrals and having the confidence to challenge the senior leaders, AMIGS ensures:

- Before the start of each academic year, stakeholders such as governors, teachers, support staff and volunteers will be re-trained on the schools safeguarding procedures – this will ensure all new and existing personnel are familiar with the school procedure.
- All new members of staff, volunteers and those who are likely to come into contact with children will be given a copy of this Policy as part of their induction.
- The Designated DSL is trained every two years or sooner to keep up to date with new legislation.
- All teaching and non-teaching staff are updated with changes to any existing regulations and any regulations in staff meetings, online, in circulars, and a copy of this together with the latest guidance is kept in the staff room for staff's perusal and reference.
- The same procedure is applied to temporary and voluntary staff; with the added awareness of procedures through 1-to-1 meetings and safeguarding training.

- All staff must read and understand Part 1 of the *Keeping Children Safe in Education (DFE September 2024)* three copies of which are: one electronic and the other two in the school's main policies file / safeguarding folder, and another, to hand in the staff room. Another complimentary copy of the same is provided in our reception area.

Monitoring and Review

The **nominated governor** (Dr Bowkan) through regular visits, reviews the school's child protection policies and procedures and the efficiency with which related duties have been discharged.

The Governing Body will review this policy annually and assess its implementation and effectiveness. Compliance with this policy will be monitored by the DSL (Nyron Gonzales) and the nominated governor (Dr Bowkan).

Students:

AMIGS students, through their PSHCE curriculum, Computer Science lessons, circulars shared with parents and students, and SMSC provisions will be informed about how to safeguard themselves. The curriculum will include looking at substance abuse, forced marriages, e-safety (which will also be looked at in Computer Science), domestic violence and how to prevent themselves from extremism and radicalisation. Further details of this curriculum can be found in the PSHCE policy and the RSE policy.

STATUTORY FRAMEWORK

In order to safeguard and promote the welfare of children, the school will act in accordance with the following legislation and guidance:

- The Children Act 1989 (allocated duties to LAs, courts, parents and other agencies to ensure and promote children's welfare), and 2004 (interests of children and young people are paramount in all considerations of welfare and safeguarding and that safeguarding children is everyone's responsibility).
- The Education Act 2002 (section 175) (maintained schools statutory duty to promote and safeguard the welfare of children and have due regard to the guidance published by the secretary of State...)
- Slough Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures (Electronic)
- Keeping Children Safe in Education (DFE 2024) which supersedes all previous versions; full document and summary for school staff)
- *Working Together to Safeguard Children* (DfE 2018)
- The Education (Student Information) (England) Regulations 2015

Working Together to Safeguard Children (DfE 2018) requires all schools to follow the procedures for protecting children from abuse which are established by the Local (Slough) Safeguarding Children Board. Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or are at risk of abuse - these procedures should also cover circumstances in which a member of staff is accused of, or suspected of abuse.

Keeping Children Safe in Education (DfE 2024) states:

Governing bodies and proprietors should ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one (or Annex A if appropriate) of this guidance.

This should include:

- *An effective child protection policy; and*
- *A staff behaviour policy (sometimes called the code of conduct) which should amongst other things include - acceptable use of technologies, staff/pupil relationships and communications including the use of social media.*

This is not intended to be an exhaustive list. These policies, along with Part one of this guidance (Keeping children safe in education 2024) and information regarding the role of the designated safeguarding lead, should be provided to all staff on induction. Governing bodies and proprietors should take a proportional risk-based approach to the level of information that is provided to temporary staff and volunteers.

The child protection policy should describe procedures which are in accordance with government guidance and refer to locally agreed inter-agency procedures put in place by the Local Safeguarding Children Board (LSCB), be updated annually, and be available publicly either via the school website or by other means.

THE DESIGNATED SAFEGUARDING LEAD

*Governing bodies and proprietors should appoint an appropriate **senior member** of staff, from the school or college **leadership team**, to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection.*

The broad areas of responsibility for the designated safeguarding lead are:

- **Managing referrals**
 - Refer all cases of suspected abuse to the local authority children's social care and police (cases where a crime may have been committed) within 24 hours of a disclosure/allegation/deep concern.
 - Liaise with the head teacher, issues, especially on-going (child protection) enquiries under section 47 of the Children Act 1989 and police investigations
 - Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
 - Notify children's social care if a child with a child protection plan is absent for more than two days without explanation, preferably on the first day of absence and at the latest on the second day of absence.
 - refer cases to the Channel programme where there is a radicalisation concern as required;
 - support staff who make referrals to the Channel programme;
 - refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
 - refer cases where a crime may have been committed to the Police as required.

- **Training**

The designated safeguarding lead should receive appropriate training carried out every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

The designated safeguarding lead should undertake Prevent Awareness training. (All members of staff are appropriately safeguarding trained with 'Prevent Awareness' and 'Channel')

- **Raising Awareness**

The designated safeguarding lead should ensure the school's policies are known and used appropriately:

- Ensure the school's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governors and or the proprietor regarding this
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave the school ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main student file

THE GOVERNING BODY

Governing bodies and proprietors must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in their schools or colleges are effective and comply with the law at all times. It is expected that Governors undergo appropriate safeguarding and child protection training at induction, and then at regular intervals.

In particular the Governing Body/proprietors must ensure that:

- they contribute to inter-agency working, which includes providing a coordinated offer of early help when additional needs of children are identified
- an effective child protection policy is in place, together with a staff behaviour policy (staff code of conduct)
- an appropriate **senior member** of staff, from the school **leadership team**, to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection.
- a designated safeguarding lead is appointed who should undergo child protection training every two years to standards approved by the local LSCB
- the school prioritises the welfare of children and young people and creates a culture where staff are confident to challenge senior leaders over any safeguarding concerns
- students are taught about how to keep themselves safe in various circumstances (when using the public transport, internet)
- different nominated members oversee all aspects of the school's work to keep students safe: safe recruitment procedures, child protection procedures, policies and procedures to promote good behaviour and combat bullying, first aid arrangements and health and safety policies and procedures.
- With work increasingly being completed online, appropriate filters and monitoring systems are in place to safeguard the students.

The Head Teacher: (The head teacher is the DSL at AMIGS).

- ensures that the safeguarding and child protection policy and procedures are implemented and followed by all staff
- allocates sufficient time and resources to enable the DSL and deputies to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures (Appendix 4)
- ensures that child's safety and welfare is addressed through the curriculum.

Reporting Procedure and Record keeping

When a staff member has suspected child abuse or non-accidental injury then the matter should be referred to the DSL (Nyron Gonzales) a written report should be made and forwarded to the DSL. The report must be a clear, precise and factual account of the observations. (Record form in the Appendix 1), (copies of said form available electronically in the staff drive, in hard copy in staffroom or the office).

Key notes:

- Record as soon as possible after the conversation.
- Do not destroy the original notes.
- Record date, time, place and any noticeable non-verbal behaviour and the words used by the child.
- Draw a diagram to indicate the position of any injuries.
- Record statements and observations rather than interpretations and assumptions.
- All records **MUST** be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

The DSL: The designated Safeguarding lead will ensure that:

- **All** staff are aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
- All staff are aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.
- All staff are aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to, bullying (including cyber bullying), gender-based assaults and sexting. Staff will be made aware that behaviours linked to the likes of drug taking, alcohol abuse, taunting and sexting put children in danger.

The DSL will decide whether the concerns should be referred to Children's Services. If it is decided that a referral needs to be made, the parent's will be informed, unless to do so would place the student at further risk of harm.

If anyone other than the designated safeguarding lead makes the referral, they should inform the designated safeguarding lead as soon as possible.

Particular attention will be paid to attendance and development of any student whom the school has concerns or has been identified as being the subject of a child protection plan and a written record will be kept. The DSL / Head teacher must be aware of trends that may affect student welfare. Where it is deemed necessary, training will be arranged for the safeguarding team.

When to be concerned:

Abuse: a form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm, or failing to act to prevent harm. They may be abused by an adult or adults or another child or children. (DFE-00341-2014).

The main categories of abuse are:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect
- Domestic Abuse: domestic abuse can be all of the above in addition to financial aspects

All staff must also be familiar with the specific forms of abuse. *All staff should be concerned if a student presents signs of possible significant harm. Please refer to Appendix 2 for details.*

Preventing Extremism and Radicalisation

Refer to AMIGS '*Preventing Extremism and Radicalisation Safeguarding*' Policy.

Overview:

When operating this policy AMIGS uses the following accepted Governmental definition of extremism which is:

'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

There is no place for extremist views of any kind in our school, whether from internal sources – students, staff or governors, or external sources - school community, external agencies or individuals. Our students see our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens.

As a school we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for children and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views we are failing to protect our students.

Missing children

The school will monitor attendance of all children and address it when it is poor or irregular. If a student is absent for a continuous period of 10 days or more, the local authority will be informed.

Forced Marriages

Regarding forced marriage, do not treat allegations of forced marriage merely as a domestic issue and send the child back to the family home as part of routine child protection procedures; do not ignore what the child has divulged or dismiss out of hand the need for immediate protection; do not approach the child's family, friends or those people with influence within the community, without the express consent of the child, as this will alert them to any enquiries that are being undertaken; do not breach confidentiality except where necessary in order to ensure the child's safety

Teachers must ensure any cases of forced marriages are reported to the DSL. The DSL will make contact with the Forced Marriage Unit; unless the child is at risk of harm, in which case a referral will be made to the LSCB. Contact: 020 7008 0151 or email fm@fco.gov.uk.

Youth produced sexual imagery(YPSI)

When an incident involving youth produced sexual imagery comes to the school attention, this procedure will be followed:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

A detailed procedure can be found on [gov.uk](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) document (annexe 6):

<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>

Dealing with a Disclosure:

If a student discloses that they have in some way been abused, the staff member/volunteer:

Must:

- Remember that their priority is to protect the child.
- Treat the matter seriously – do not show signs of shock or disbelief.
- Receive the child's story if appropriate, listen but do not judge.
- React to what the child tells you with belief and tell the child that they have done the right thing in telling you.
- Reassure them that what has happened is not their fault.
- Ensure that the child(ren) understand that the laws generally, and the law on child-on-child abuse is there to protect them rather than criminalise them.
- Indicate to the child what action will take and make it clear that you will have to inform others (no secrets). Only inform those with a need to know.
- Keep an accurate record of what you have become aware of and what you have done.
- Limit any questioning.

Staff must not:

- Contact the parent.
- Interrogate the child if that child has disclosed information or asked leading questions.
- Speak to anyone about whom allegation are made (including colleagues).
- Promise to keep secrets/confidentiality.
- Ask a child outright if they or others have suffered abuse.
- Give personal advice or counselling on sexual matters (including contraception's and abortion) to a student (either individually or within a group) if a parent has withdrawn that student from sex education;
- Give personal contraception advice to students under 16 (for whom sexual intercourse is illegal) without parental consent. (Legally a teacher can give a child under 16 contraceptive advices if the teacher believes that doing so is in the child's best interests. However, in certain circumstances the teacher could be liable to criminal charges and therefore the Governors' instructions are not to give such advice and to refer the matter to the Head teacher).

Supporting Staff

- Members of staff who have had to deal with a student who may have suffered harm, may become distressed and upset.
- AMIGS will ensure that full support is given to these teachers so that they are able to talk through their problems with the DSL.
- The DSL and deputy will receive up to date and appropriate training.

Supporting students at risk and whom we have concern

AMIGS recognises that children who are abused or who witness violence may find it difficult to develop a sense of self worth and to view the world in a positive way. AMIGS may be the only stable, secure and predictable element in the lives of children at risk.

We will endeavour to support students through:

- (a) The curriculum to encourage self-esteem and self-motivation.
- (b) Our ethos, which promotes a positive, supportive and secure environment and which, gives students a sense of being valued.
- (c) The implementation of our behaviour management policies, which seeks to reward rather than punish, and which encourages reflection and positive change.
- (d) A consistent approach, which recognises and separates the cause of behaviour from that which the child displays. This is vital to ensure that all children are supported within our setting.
- (e) A commitment to develop productive, supportive relationships with parents, whenever it is in the child's interests to do so.
- (f) Regular liaison with other professionals who support the students and their families.
- (g) The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in child protection situations:

Safe AMIGS Students and Staff

Staff must adopt the following procedures but it is understood that where it may not be possible to implement them for various reasons, professional judgement will be necessary.

One-to-one situations

- (a) If speaking privately to a student use an area where other staff/ students can see you.
- (b) It is recognised that in AMIGS consoling students may require a reassuring arm on the shoulder but try to avoid excessive familiarity with students.

Compromising situations

If a member of staff feels that he has placed himself in a compromising situation then an immediate discussion should take place with a senior member of staff or the DSL.

Visitors to AMIGS

All visitors to AMIGS must sign in at reception and must wear a visitor's badge. Staff members should supervise all visitors who have access to AMIGS. Staff/students should challenge any adult unknown to them who are in the school premises / community without a badge.

Staff should report any unacceptable forms of behaviour by adults at AMIGS to a senior member of staff.

Recruitment

For the recruitment of staff, AMIGS will use the disclosure service provided by the Disclosure Barring Services who provides a one-stop shop service enabling recruiters to carry out checks from a variety of information sources through just one channel, the DBS.

Disclosure will bring together information held on the Police National Computer (PNC); local police records; and, where appropriate, information held on lists held by the DBS of those considered unsuitable to work with children.

All staff will also be checked to ensure they have not been prohibited from teaching. All management will be checked to ensure they are not prohibited under section 128 provisions. Both prohibition checks will be carried out using the NCTL teacher services system.

Please refer to the Safer Recruitment Policy.

Confidentiality

- 1. All Child Protection matters are confidential.**
- 2. The designated member of Staff will disclose any information on a need-to-know basis only.**
- 3. All Staff are aware that they have a professional and moral responsibility to safeguard students and so will share information with other agencies where needed.**
- 4. All staff are aware that they CANNOT keep secrets.**

Communication with parents

AMIGS will:

Ensure the child protection policy is available publicly either via the school website or by other means. Parents should be informed prior to referral, unless it is considered to do so might place the child at increased risk of significant harm by:

- the behavioural response it prompts e.g. a child being subjected to abuse, maltreatment or threats / forced to remain silent if alleged abuser informed;
- leading to an unreasonable delay;
- leading to the risk of loss of evidential material;
- placing a member of staff from any agency at risk.

Ensure that parents have an understanding of the responsibilities placed on the school and staff for safeguarding children.

Allegations made against staff

For clarification, this policy takes into consideration low-level concerns that includes -and are not limited to whistle-blowing, and allegations against staff. Any person who receives an allegation about a member of staff or any senior member of staff or any person outside the school by a student, parent or another staff member should report the matter immediately to the DSL who will then follow the procedures set out in the flow chart. (See Appendix 3)

Allegations could be made if it is believed that the staff/volunteer may have:

- Behaved in a way that has, or may harm a student.
- Possibly committed a criminal offence against/related to a student.
- Behaved towards a student or students in a way which indicates that they would pose a risk of harm if they work regularly or closely with them.

If the concern is about the Head teacher, then the Chair of Governors should be contacted.

No action should be taken without the advice of the LADO.

Referral Duties:

- If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral.
- Any allegation made against a teacher will be referred to the Local Authority Officer (LADO) within 24 hours of the allegation being made. The school will follow the advice from the LADO at every stage until the case is resolved.
- The school has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the individual has left the school. In this context, ceasing to use a person's services includes: dismissal; non-renewal of a fixed term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence and the school may be removed from the DfE register of independent schools.
- Where the school ceases to use the services of a teacher because of serious misconduct, or would have dismissed them had they not left first, they must consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

Allegations made against students

Should allegations of abuse be made by students against other students, the school will first see whether matters can be addressed within the scope of the anti-bullying policy. If not, the information will be collected and passed on to the LSCB within 24 hours. The school will not take any further action until advice is received from the LSCB and/or the police.

APPENDICES

(All multi agency referral forms are in the Head teachers Office and will be used by the DSL)



AL-MADANI
INDEPENDENT
GRAMMAR SCHOOL

Appendix 1

CONCERN FORM

Child's Name :			
Child's DOB :			
Ethnic Origin :		Disability Y/N :	
Date and time of concern :			
Your account of the concern : (what was said, observed, reported and by whom)			
Additional information : (your opinion, context of concern/disclosure)			
Your response : (what did you do/say following the concern)			
Your name :		Your signature :	
Your position in school :		Date and time of this recording :	
Action and response of DSL/Headteacher			

Appendix 2

Types of Abuse and signs of abuse (1/3)

Physical Abuse

Is a physical injury to a child where there is definite knowledge, or a reasonable suspicion, that the injury was inflicted or knowingly not prevented.

This includes for example, deliberate poisoning and attempted drowning or smothering, as well as hitting, shaking, throwing, burning, suffocating and Female Genital Mutilation.

Possible Signs of Physical Abuse

- Unexplained injuries or refusal to discuss them
- Cigarette burns
- Long bruises – possibly made by a belt
- Teeth marks
- Fingertip/slap marks or bruises
- History of bruises/injuries with inconsistent explanations
- Bilateral black eyes
- Self destructive tendencies
- Aggression towards others
- Untreated injuries
- Fear of medical treatment
- Unexplained patterns of absence that could be in order to hide injuries.

Emotional Abuse

Is the persistent or severe emotional ill treatment of a child which has severe adverse effect on the behaviour and emotional development of that child? Its diagnosis will require medical, psychological psychiatric, social and educational assessment.

(NB All abuses involves some emotional ill-treatment, this category should only be used when it is the main or sole form of abuse).

Possible Signs of Emotional Abuse

- Developmentally delayed
- Inappropriate emotional responses
- Self-mutilation
- Extreme passivity or aggression
- Running away
- Drug/solvent abuse
- Excessive fear of situations or people
- Social isolation
- Depression

Types of Abuse and signs of abuse (2/3)

Sexual Abuse

Is the involvement of dependent, developmentally immature children and adolescents in sexual activities they do not truly comprehend, to which they are unable to give informed consent. This will also include Child sexual exploitation (CSE).

The key elements in any definition of child sexual abuse are:

1. Betrayal of trust and responsibility
2. Abuse of power for the sexual gratification of the abuser
3. Inability of children to consent

Possible Signs of Sexual Abuse

- Depression, suicidal, self harming
- Anorexic/ bulimic
- Acting in a sexually inappropriate way towards adults/peers
- Unexplained pregnancies
- Running away
- Telling of a 'friend with a problem abuse'
- Sexually abusing a younger child
- Sudden changes in school or work habits
- Afraid of certain people
- 'Chronic' medical problems (stomach pains/headaches)
- Withdrawn, isolated, excessively isolated

Child sexual exploitation

Is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

Types of Abuse and signs of abuse (3/3)

Neglect

Is the persistent or severe neglect of a child which results in serious impairment of that child's health or development.

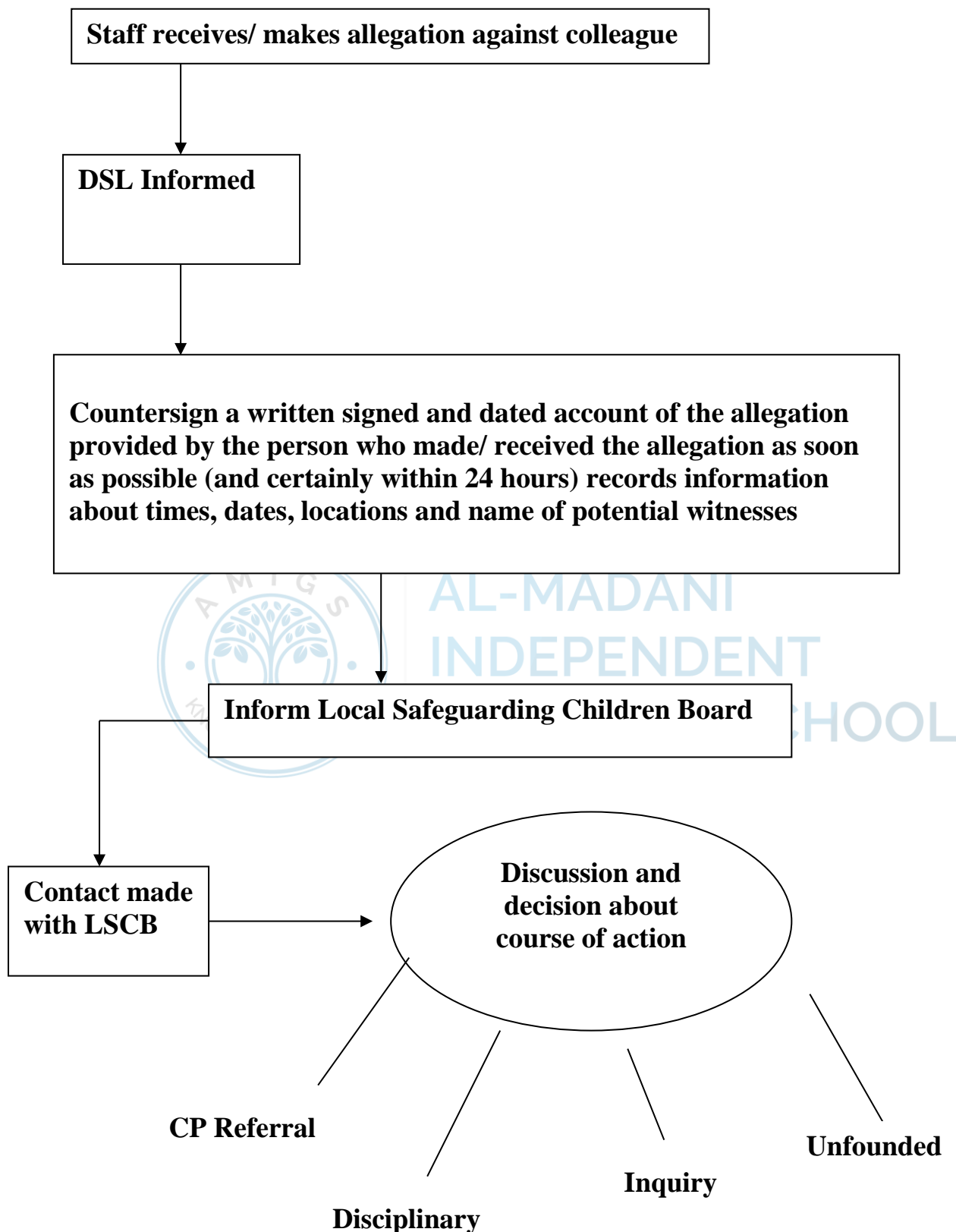
1. This may be exposure to danger or by repeated failure to attend to the physical and developmental needs of the child.
2. Non – organic failure to thrive may result from neglect of a child but always requires medical diagnosis, by appropriate exclusion of organic causes.

Possible Signs of Neglect

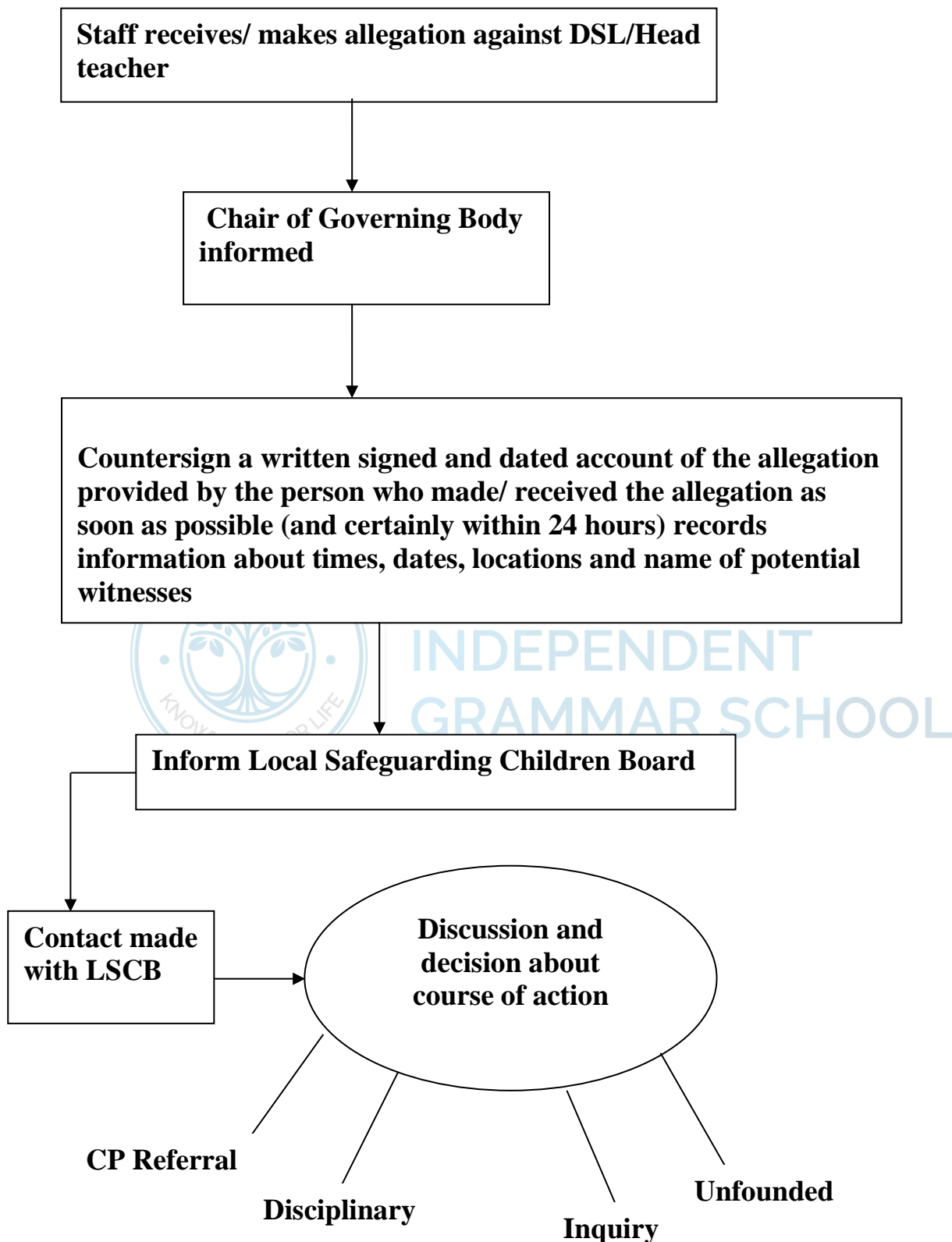
- 'Failure to thrive' (looks thin, unwell, below average height and weight)
- Usually hungry
- Has regular accidents (especially burns)
- Poor personal hygiene
- Kept away from school medicals
- Tiredness
- Reluctant to go home
- Poor social relationships
- Frequent lateness/ non attendance at school
- Inappropriate clothing

Pages 139-1160 (Annex B) of the guidance *Keeping Children Safe in Education (2022)* contains important additional information about specific forms of abuse and safeguarding risks to which students may be exposed, and lists links to organisations that provide guidance. For example, on domestic violence, drugs, gangs and youth violence, extremism, radicalisation, sexting, teenage relationship, abuse and trafficking. Child-on-child abuse, that may be stand alone or part of a broader pattern of behaviour.

Appendix 3



- 1) Any person who makes or receives an allegation against the DSL should report the matter immediately to the Chair of GB who will then follow the procedures set out in the flow chart: -



Appendix 4

Whistle Blowing Procedure

Introduction

Whistle Blowing is when an employee publicly discloses some alleged wrong-doing within an organisation. Employees may be the first to notice something seriously wrong within AMIGS. Employees may not disclose any information as they feel that speaking up would be disloyal to their colleagues, or to the organisation.

This policy aims to make sure that if you want to raise any concern, you can do so with confidence and without having to worry about being victimised or discriminated against.

This policy intends to deal with serious or sensitive concerns about any malpractice such as the following.

- Any child protection issues
- Concerns of extremism or radicalisation of Students and Staff
- Health and welfare of boarders at risk (boarders being mistreated as outlined above)
- Fraud or corruption
- Unauthorised use of public money
- Criminal Offence
- Any damage to Health and Safety
- Environmental damage
- Improper conduct or unethical behaviour
- A person being discriminated against due to their race, colour, religion, ethnic or national origin, disability, age sex, sexuality, class or home life.
- Attempts to suppress or conceal any information relating to any of the above

Protection

All necessary action will be taken by the organisation to protect that employee who discloses information from harassment or victimisation or any retribution where an employee makes a disclosure in good faith and reasonably believes that it is true. However if any information is disclosed which is untrue then the organisation will take appropriate disciplinary or legal action against the staff involved.

If a member of staff suffers adverse treatment, harassment or victimisation as a result of his or her disclosure, disciplinary action may be taken against the perpetrator.

Many employees keep their allegations anonymous but these allegations tend to be far less effective.

We request that if any employee making a disclosure puts his/her name to any disclosure. The identity of the employee raising the matter will be kept confidential if this is what they require.

Procedure

An employee should raise her/his concerns with Nyron Gonzales (DSL) if related to child protection issues. In the absence of DSL, speak to the Deputy DSL Andrew Ramsey. If you are not satisfied then you may raise it with the Chair of Governors who can be contacted at governors@amigs.uk; you may also contact local LSCB office at:

Team/Service group: Children's services department

Address: Children and Families Team
Slough Social Services
Town Hall
Bath Road
Slough
SL1 3UQ

Contact: Tel: 01753 690740 or 875591

Out of hours services tel: 01344 786543

Fax: 01753 690700

Minicom: 01753 875030

Opening hours: Monday - Friday, 9am - 5pm.

Email: child.Protection@slough.gcsx.gov.uk

Independent Advice

If you require independent advice you may phone the independent charity public concern at work on 0207 4046609 or the internet at WWW.PCAW.CO.UK confidential advice will be given to you about how to raise a concern about serious malpractice at work.

For effective action to be taken it will be best to put all the concerns in writing with all the concerns in writing with all the relevant details e.g. names, dates, places and reasons for making the disclosure.

Respond

The person to whom the disclosure is made will consider the information and decide what action to take, any of the following can take place.

- Internal investigation
- Referred to the police
- Independent investigation

Any concerns that need to be dealt with which fall under other procedures the employee will then be advised to approach the appropriate member of staff or the concern will be passed onto the relevant person.

The employee relating the concern will be updated on the progress and outcome of any investigation.

Appendix 5

CONTACTS and IMPORTANT INFORMATION

Headteacher: Nyron Gonzales
headteacher@amigs.uk
(DSL) SENDCO
Mental Health and Wellbeing
01753 202203 / 079 8355 3839

Administration / Office
admin@amigs.uk
01753 202203
073 0821 2345

Chair of Governors
Dr Zabear Bowkan
governors@amigs.uk
073 0821 2345

Deputy Head Teacher: Andrew Ramsey
aramsey@amigs.uk
Pastoral Lead, Deputy DSL,
Mental Health and Wellbeing
073 0821 2345

Proprietor
Mr Aqeel Lone
admin@amigs.uk
073 0821 2345

Vice-Chair of Governors
Hafidh Adeel Lone
governors@amigs.uk
073 0821 2345

Key Persons and Agencies

Education Safeguarding Officer
Jatinder Matharu | Slough Borough Council
Telephone: 01753 875068 / 07714 858213 Jatinder.matharu@slough.gov.uk

Slough Children First / Early Help
Telephone: 01753 875362 sloughchildren.referrals@scstrust.co.uk.
For out of hours service please call: 01344 786543
<http://www.scstrust.co.uk/first-contact/>

| **Local Authority Designated Officer (LADO) Harvinder Rajansani**
Slough Children First | 01753 474053 | 07927 681858
| LADO@scstrust.co.uk **Telephone:** 07927 681858 / 01753 690906

Police: Thames Valley Police: www.thamesvalley.police.uk **Telephone:** 101

Slough Family Information Service (FIS)
<https://www.sloughfamilyservices.org.uk/kb5/sloughcst/directory/home.page>

Mental Health : 0300 365 1234.
<https://cypf.berkshirehealthcare.nhs.uk/our-services/children-and-adolescent-mental-health-services-camhs/about-our-mental-health-services-camhs/>

Hospital: Wexham Park Hospital, Wexham St, Slough SL2 4HL
Telephone: 01753 633000 **Ambulance:** 999

Fire: Tuns Ln, Slough SL1 2XA **Telephone:** 0118 945 2888

Appendix 6: as reproduced from

<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>

Applies to England

Contents

1. [1. Background and context](#)
2. [2. Handling incidents](#)
3. [3. Educating children and young people](#)
4. [Annex A: Assessing adult-involved incidents – further information](#)
5. [Annex B: Questions to support assessment](#)
6. [Annex C: Training exercise](#)
7. [Annex D: Table of substantive changes from Sharing nudes and semi-nudes \(2020 version\)](#)

Disclaimer

Relevant laws and best practice have been taken into account in the development of this document. However, these issues have the potential to be complex and multi-faceted. As case law in this area is still relatively underdeveloped, nothing in this document should be taken as legal advice.

The authors and other contributors to this document accept no liability for any damage or loss suffered or incurred whether directly, consequentially, indirectly, or otherwise by anyone relying on the information in this publication or any other information referred to in it.

Web addresses, social networks, apps, and other references in this document were correct at the time of publication but may be subject to change over time.

This document was last updated and published in February 2024. See [Annex D](#) for a list of substantive changes.

Production of this guidance has been coordinated by the UK Council for Internet Safety's Education Working Group in partnership with the NPCC.

1. Background and context

1.1 Who is this for?

This advice is for designated safeguarding leads (DSLs), their deputies, headteachers and senior leadership teams in schools and educational establishments^{[footnote 11](#)} in England. Other members of staff should see a one-page summary on how to manage incidents available on the [UK Council for Internet Safety's \(UKCIS'\) website](#).

This document may also act as good practice advice for out-of-school settings providing education for children and young people in England (e.g. extracurricular clubs, youth organisations and providers).

Practitioners working in education settings in Wales should see the following advice on responding to incidents:

- [Sharing nudes and semi-nudes: responding to incidents and safeguarding children and young people](#) (Welsh Government as part of UKCIS)

Practitioners working in education settings in Scotland should see the following guidance and advice for responding to incidents and safeguarding children and young people in Scotland:

- [National Guidance for Child Protection in Scotland](#)
- [Healthy relationships and consent: key messages for young people](#) (Scottish Government)
- [Upstream](#) (Stop It Now! and the Scottish Government)
- [What's the problem?](#) (Stop It Now!)
- [Internet safety for children and young people: national action plan](#) (Scottish Government)

1.2 What does this advice cover?

This advice outlines how to respond to an incident of nudes and semi-nudes being shared (see [section 1.4](#) for a definition), including:

- risk assessing situations
- safeguarding and supporting children and young people
- handling devices and images
- recording incidents, including the role of other agencies
- informing parents and carers

The types of incidents which this advice covers are:

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18

This advice does not cover:

- children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images

In response to these issues, education settings should follow their local authority's guidance and schools and colleges should also refer to the Department for Education's (DfE's) [Keeping children safe in education](#) statutory safeguarding guidance.

1.3 What is the status of this advice?

The production of this advice has been co-ordinated by the UKCIS Education Working Group in consultation with the National Police Chiefs' Council (NPCC) on behalf of UKCIS.

This advice is non-statutory, and schools and colleges should read this alongside:

- [Keeping children safe in education](#): statutory guidance (DfE)
- [Searching, screening and confiscation](#): non-statutory advice (DfE).

The advice replaces 'Sexting in schools and colleges: responding to incidents and safeguarding young people' published in 2016 by UKCIS in collaboration with the NPCC and Charlotte Aynsley.

1.4 'Sharing nudes and semi-nudes': definition

This advice uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

Nude or semi-nude images, videos or live streams may include more than one child or young person. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

1.4(a) Alternative definitions

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18. Further guidance on the law can be found in [Section 1.7](#)
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes^{[footnote 2](#)}

Terms such as 'revenge porn' and 'upskirting'^{[footnote 3](#)} are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

1.5 Why does this matter to settings working with children?

Sharing photos, videos and live streams online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives.

Photos and videos can be shared via messaging apps or posted on social media and image sharing platforms. It is important to note that children and young people send a variety of images and videos, some of which are not nude, semi-nude and/or exploitative or intended to be so. However, the focus of this guidance is on the sending of nudes and semi-nudes.

Not all young people send nudes and semi-nudes but many are asked to send them or receive images and videos of others with or without consent. Research by Revealing Reality in 2022 of 15 – 18 year olds found^{[\[footnote 4\]](#)}:

- 20% of girls and 13% of boys aged 15 - 18 had ever sent a nude picture or video of themselves
- 60% of girls and 31% of boys had been asked to share a nude or semi-nude
- 54% of girls and 30% of boys had experienced someone sending them a nude or semi-nude

In 2023, Ofcom found that not only did children and young people's experiences of nude image sharing vary according to gender but also by^{[\[footnote 5\]](#)}:

While most children and young people aren't creating or sharing these types of images and videos, the potential risks and impact are significant. A 2023 evidence review from the NSPCC illustrates that the impact of non-consensual sharing can include^{[\[footnote 6\]](#)}:

- fear, distress, and helplessness
- self-blame or shame
- higher levels of depression and anxiety
- reputational damage
- peer exclusion and victim blaming
- revictimisation through forwarding of images, comments and likes on the image by peers

Being a victim of an adult-involved incident (online child sexual abuse) can also lead to further social and psychological impacts such as self-harm, low self-esteem, post-traumatic stress disorder symptoms, and behavioural problems at school^{[\[footnote 7\]](#)}.

Producing and sharing nudes and semi-nudes of under 18s is also illegal, which causes considerable concern in education settings working with children and young people, and amongst parents and carers.

Although the production of such images will likely take place outside of education settings, sharing can take place and the impacts of an incident are often identified or reported here. Education settings need to be able to respond swiftly and confidently to make sure children and young people are safeguarded, supported, and educated.

This advice aims to support education settings in developing procedures to respond to incidents involving nudes and semi-nudes. It also signposts sources of resources and support.

These procedures should be part of an education setting's safeguarding arrangements and all incidents should be dealt with as safeguarding concerns.

The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of any children and young people involved.

Individual incidents of peer abuse and sexual behaviour (the sharing of nudes and semi-nudes can fall under this category) can lead to unhealthy or damaging cultures within the school community. How these incidents – including incidents of ‘low level’ harmful sexual behaviour – are responded to directly affects the culture of the school. If handled poorly, an unsafe and unhealthy set of norms can be created which enable peer-on-peer abuse and this can also prevent other children and young people from disclosing.

It must be recognised that the individual case management can affect school-wide culture, peer response and all children’s ability to speak out.

1.6 Understanding motivations and behaviours

Nudes and semi-nudes can be shared by, and between, children and young people under a wide range of circumstances and are often not sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship^[footnote 8]. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include:
 - children and young people selling nudes or semi-nudes of others online
 - children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity
 - children and young people hacking a peer’s account to share images more widely without consent to publicly shame

children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them (see [Annex A](#) for further information on assessing adult-involved incidents).

An education setting’s response to an incident will differ depending on the motivations behind the incident and the appropriateness of the child or young person’s/people’s behaviour.

To ensure an appropriate and proportionate response to an incident of nudes and semi-nudes being shared, education settings can use the tools set out below.

1.6(a) Defining the incident

[Finkelhor and Wolak’s typology](#) of youth-produced imagery cases can be used to define and assess incidents according to motivations^[footnote 9].

Incidents can broadly be divided into two categories:

- **aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can further be sub-categorised into:
 - **adult involved:-** adult offenders (even criminal gangs) attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the Internet. The images may be

solicited by adult offenders. Some offenders may coerce or blackmail the child or young person into sending more images or making a payment (known as financially motivated sexual extortion or 'sextortion')^[footnote 10] These are all forms of child sexual abuse. See [Annex A](#) for important additional information on sexually and financially motivated adult involved incidents.

- **youth only – intent to harm:** these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail (including financial), threats or deception, sexual abuse or exploitation by young people
- **youth only – reckless misuse:** no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result
- **experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be subcategorised into:
 - **romantic:** incidents in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair
 - **'sexual attention seeking':** the phrase 'sexual attention seeking' is taken directly from the typology however it is important to note that incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image.
 - **other:** cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

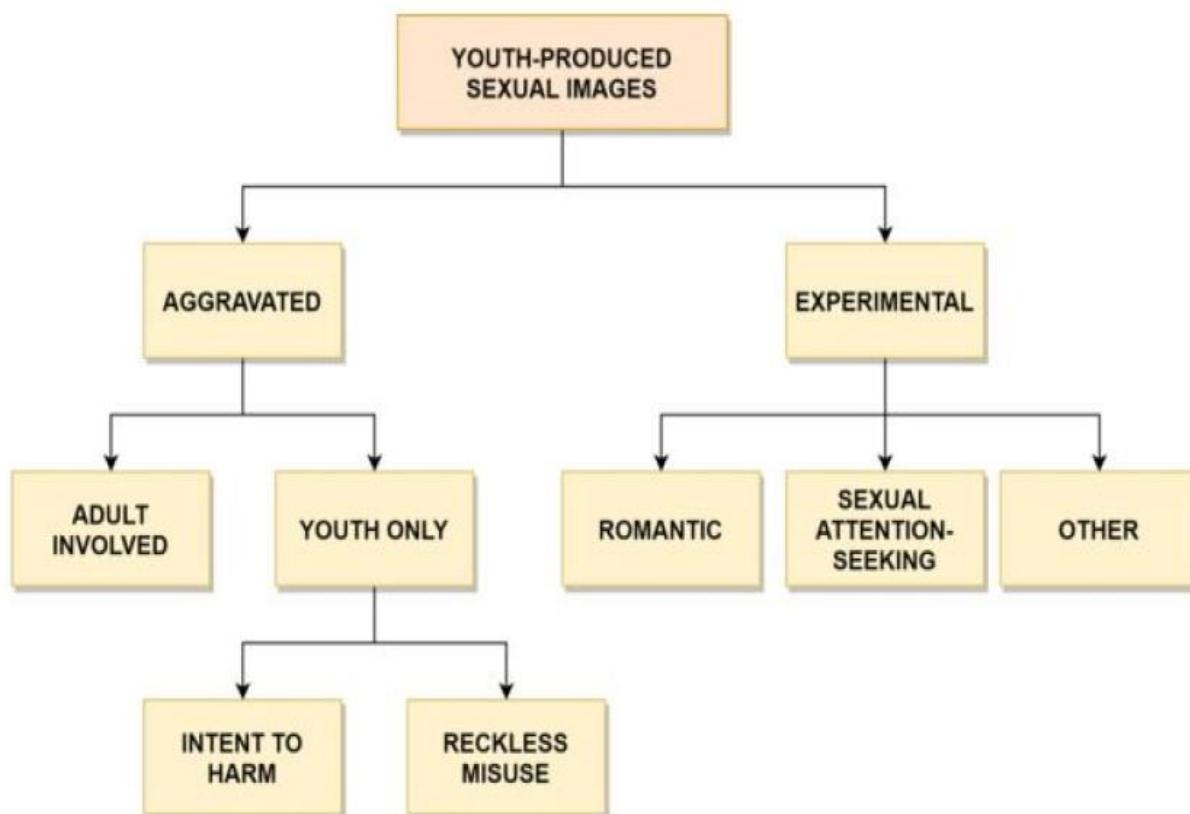


Fig 1: Sexting, a typology (Finkelhor and Wolak)

[Annex C](#) sets out an exercise that education settings can use within staff training to illustrate the different types of peer-to-peer sharing incidents that can occur and highlight that an appropriate and proportionate response needs to be considered for each incident.

1.6(b) Assessing behaviour

DSLs (or an education setting's equivalent) will need to be mindful that behaviour, which may not initially appear to be sexually motivated, may have occurred as a result of risky or harmful behaviour or sexual abuse being 'normalised' for children and young people.

Hackett's 'Continuum of children and young people's sexual behaviours' model can also help practitioners to understand that children and young people's sexual behaviours exist on a wide continuum from normal to abusive and violent behaviours, and may move fluidly between each category. It is important to note that an isolated incident that demonstrates problematic or abusive behaviour may not necessarily be indicative of the child or young person's overall sexual behaviour.^{[\[footnote 11\]](#)} The incident should be dealt with proportionally to the behaviour being displayed.

Fig 2: Adapted from 'A continuum of children and young people's sexual behaviours' (Hackett, 2010)

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

It is important for professionals to place a child's sexual behaviour within the context of their age and development. DSLs (or equivalents) must ensure that they are familiar with and follow the relevant local policies and procedures to help them do so. This includes contact with safeguarding partners and guidance on recognising and responding to harmful behaviours and/or underage sexual activity when dealing with children with under 13. Frameworks such as Brook's [Sexual Behaviours Traffic Light Tool](#) can also be used to identify when a child or young person's sexual behaviour is a cause for concern in relation to their development.

Any child or young person displaying harmful sexual behaviour should be safeguarded and supported in moving forward from the incident and adopting positive behaviour patterns.

Where a child or young person displays appropriate sexual behaviour within the context of their age or development, consideration should still be given as to whether the taking or sharing of the nude or semi-nude raises any additional concerns.

Further support and resources on addressing harmful sexual behaviour in education settings can be found at <https://www.contextualsafeguarding.org.uk/>.

1.7 The law

1.7(a) Indecent images of children

Responding to incidents of sharing nudes and semi-nudes is complex because of its legal status. Making, possessing, and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. The term 'Child Sexual Abuse Material' (CSAM) can also be used to describe indecent images of children

The relevant legislation is contained in the [Protection of Children Act 1978 \(England and Wales\)](#) as amended in the [Sexual Offences Act 2003 \(England and Wales\)](#)^[footnote 12].

Specifically:

- it is an offence to possess, distribute, show and make indecent images of children
- the Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18

'Indecent' is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or district judge to decide based on what is the recognised standard of propriety^[footnote 13].

Indecent imagery does not always mean nudity, however images are likely to be defined as such if they meet one or more of the following criteria:

- nude or semi-nude sexual posing (e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear)
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

The term 'indecent images' also include pseudo-images which are computer-generated images that otherwise appear to be a photograph or video. These may be created using tools such as photo/video editing software, deepfake apps and generators (to combine and superimpose existing images or videos onto other images and videos), and AI text-to-image generators.

1.7(b) Non-consensual image sharing

The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal. The relevant legislation is contained in section 33 of the Criminal Justice and Courts Act 2015.

The Domestic Abuse Act 2021 amended section 33 of the Criminal Justice and Courts Act 2015 and it is now an offence to make threats to disclose private sexual photographs and/or films.

1.8 Avoiding unnecessary criminalisation of children

The law criminalising indecent images of children was created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children and young people. The law was also developed long before mass adoption of the internet, mobiles and digital photography.

Despite this, children and young people who share nudes and semi-nudes of themselves, or peers, are breaking the law.

However, children and young people should not be unnecessarily criminalised. Children and young people with a criminal record face stigma and discrimination in accessing education, training, employment, travel and housing and these obstacles can follow them into adulthood^[footnote 14].

Whilst children and young people creating and sharing images can be risky, it is often the result of their natural curiosity about sex and their exploration of relationships. Therefore, engaging in the taking or sharing of nudes and semi-nudes may not always be 'harmful' to all children and young people. Situations

should be considered on a case by case context, considering what is known about the children and young people involved and if there is an immediate risk of harm. Often, children and young people need education and support for example, on identifying healthy and unhealthy behaviours within relationships and understanding consent and how to give it. Safeguarding action will also be required in cases where there is risk of harm.

Investigation by police of an incident of sharing nudes and semi-nudes does not automatically mean that the child/young person involved will have a criminal record, as explained in the next section.

1.9 The police response

The NPCC has made it clear that incidents involving sharing nudes and semi-nudes should have an immediate focus on safeguarding children.

In many cases, education settings may respond to incidents without involving the police, for example where an incident can be defined as 'experimental' (see [section 1.6](#)) and there is no evidence abusive or aggravating elements. Further advice on the circumstances in which this would be appropriate can be found in [section 2](#).

The police may, however, need to be involved in some cases to ensure thorough investigation, including the collection of all evidence (for example, through multi-agency checks). **Where there are abusive and/or aggravating factors, incidents should always be referred to the police through the Multi-Agency Safeguarding Hub (MASH) or equivalent** (see [section 2](#) for further guidance).

Even when the police are involved, a criminal justice response and formal sanction against a child or young person would only be considered in exceptional circumstances.

To help local police services develop a coordinated, effective and proportionate response in this area, the National Police Chiefs Council and College of Policing has produced [operational advice for law enforcement](#) relating to the investigation of nudes and semi-nudes sharing offences.

1.9(a) Crime recording

When an incident of sharing nudes and semi-nudes is reported to police, they are obliged, under the Home Office Counting Rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a 'crime' and the child or young person involved may be listed in relation to it.

This is not the same as having a criminal record.

Police should consider how details of the individuals are recorded and there remains local discretion to avoid recording a young person as a suspect where there is lack of evidence of intention – for example in consensual or accidental incidents.

1.9(b) Police decision

Once an incident is reported to the police, they will investigate and decide on an appropriate outcome.

If an incident is found to have abusive and/or aggravating factors, the child or young person may receive a caution or conviction.

To mitigate the risk of children and young people being negatively impacted, the police are able to record the outcome of an investigation using an outcome 21 code should an incident be found to be non-abusive and have no evidence of any of the following:

- exploitation
- grooming
- profit motive
- malicious intent (e.g. extensive or inappropriate sharing e.g. uploading onto a pornographic website)
- persistent behaviour

The outcome 21 code, launched in 2016, helps to formalise the discretion available to the police when handling crimes such as the sharing of nudes and semi-nudes.

Outcome 21 states:

“Further investigation, resulting from the crime report, which could provide evidence sufficient to support formal action being taken against the suspect is not in the public interest. This is a police decision.”

This means that even though a child or young person has broken the law, and the police could provide evidence that they have done so, the police can record that they chose not to take further action as it was not in the public interest.

The decision to use outcome 21 in these circumstances is likely to be reviewed by a suitably senior and/or experienced officer.

Once an appropriate outcome has been decided, it should be communicated by police to the child or young person affected, their parent or carers and the school where appropriate. This should also explain the immediate and longer-term implications.

1.9(c) Criminal records check

A decision to disclose information as a part of any criminal record check (a DBS certificate in England) is made on the basis of whether that information is relevant to the risk an individual might pose to children, young people or vulnerable adults.

It is possible for an incident of sharing nudes and semi-nudes recorded on police systems with outcome 21 to be disclosed on a DBS certificate.

However, information falling short of conviction or caution can only be included on a DBS certificate when an individual has applied for an Enhanced Criminal Records Check. In such cases, it would be for a chief officer to consider what information (in addition to convictions and cautions held on the Police National Computer) should be provided for inclusion. That decision must be made on the basis that the chief officer reasonably believes the information to be relevant to the purpose of the disclosure (for example, someone taking up a position working with children) and considers that it ought to be included.

1.9(d) Police seizure of devices

During the course of an investigation, it may become necessary for the police to seize electronic storage devices (such as mobile phones) to progress inquiries and inform safeguarding decisions^{[\[footnote 15\]](#)}. Those incidents that are carefully assessed to be lower risk (for example, where the sharing is believed to be consensual and age-appropriate) should not have their devices seized as a matter of routine. In other circumstances, officers will consider the least intrusive way to acquire material – considering the impact of removing a child’s device, balanced with ensuring that evidential integrity is maintained.

In cases that a device is seized by the police and is found to contain nudes or semi-nudes, it is unlikely that it could be returned unless the images were solely of the owner of the device. This is because it is difficult to remove all image traces from a device and returning a device could possibly be interpreted as supplying an indecent image.

Where officers have seized images that have been shared beyond the control of the child or young person, they will enable the images to the Child Abuse Image Database (CAID), a national repository for indecent images. Records of the images on CAID can be shared with major technology companies to prevent their re-circulation online and also enable future investigations if the image is discovered in connection with other crimes.

1.9(e) Multi-agency working

Should police inform a school or college of an incident previously unknown to the setting, the DSL (or equivalent) should follow statutory guidance set out in Keeping Children Safe in Education.

Out-of-school education settings should liaise with relevant multi-agency partners.

2. Handling incidents

2.1 Initial response

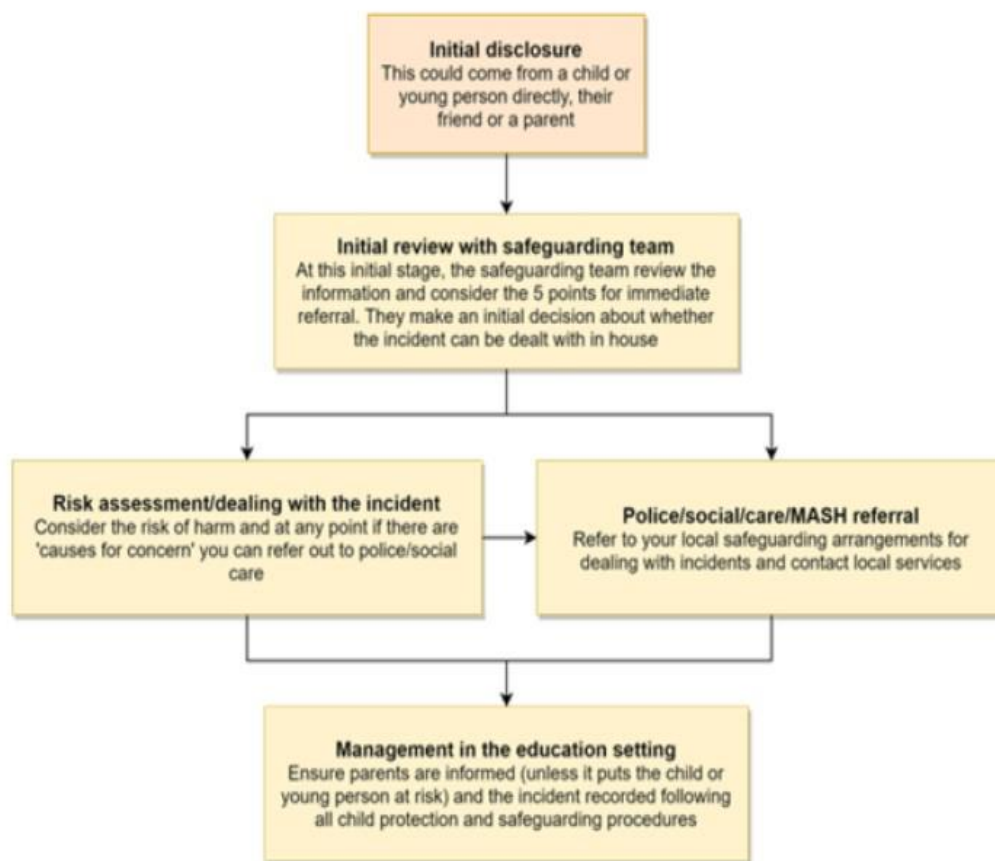
All schools and colleges are required to have an effective child protection policy in place^{[\[footnote 16\]](#)}. It is best practice and recommended for out-of-school settings to also have a child protection policy in place.

The policy should reflect the education setting's approach to incidents of nudes and semi-nudes being shared and staff should respond to such incidents in line with it.

When an incident involving nudes and semi-nudes comes to the attention of any member of staff in an education setting:

- the incident should be referred to the DSL (or equivalent) as soon as possible
- the DSL (or equivalent) should hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- there should be subsequent interviews with the children or young people involved (if appropriate)
- parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm
- a referral should be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

Fig. 3 summarises the approach education settings should take when responding to an incident. This approach is outlined in this section.



It is important to note that a disclosure may not be a single event and the child and young person may share further information at a later stage therefore multiple reviews and risk assessments may be needed depending on the situation.

2.2 Disclosure

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and must be equipped with the necessary safeguarding training and support to enable them to recognise concerns. Procedures should be covered within the setting's child protection policy. [Annex C](#) contains a training exercise which may be used to highlight the issues for staff.

Any direct disclosure by a child or young person should be taken seriously. A child or young person who discloses they are the subject of an incident of sharing nudes and semi-nudes is likely to be embarrassed and worried about the consequences. It is likely that disclosure in the education setting is a last resort, and they may have already tried to resolve the issue themselves.

When a disclosure is made, the member (or members) of staff should ensure the child is feeling comfortable and appropriate and sensitive questions are asked, in order to minimise further distress or trauma to them.

Further resources to help adults respond to disclosures of abuse can be found on the [NSPCC website](#).

2.3 Initial review meeting

The initial review meeting should consider the initial evidence and aim to establish:

- whether there is an immediate risk to any child or young person
- if a referral should be made to the police and/or children's social care
- if it is necessary to view the image(s) in order to safeguard the child or young person – **in most cases, images or videos should not be viewed (see [section 2.10](#)) for further guidance on when an image may need to be viewed)**
- what further information is required to decide on the best response
- whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown
- whether immediate action should be taken to delete or remove images or videos from devices or online services
- any relevant facts about the children or young people involved which would influence risk assessment
- if there is a need to contact another education, setting or individual
- whether to contact parents or carers of the children or young people involved - in most cases they should be involved

DSLs can use Finkelhor and Wolak's typology and harmful sexual behaviour tools outlined in [section 1](#) to help categorise the incident and assess the behaviours of any child or young person involved to identify any immediate risks. An immediate referral to police and/or children's social care through the MASH or equivalent should be made if at this initial stage:

1. The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See [Annex A] for further information on assessing adult-involved incidents
2. There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
3. What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent (see [section 1.6](#) for guidance on assessing behaviour).
4. The images involves sexual acts and any child or young person in the images or videos is under 13 [See Annex B](#)
5. You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

If none of the above apply, an education setting may decide to respond to the incident without involving the police or children's social care. They can still choose to escalate the incident at any time if further information/concerns are disclosed later.

The decision to respond to the incident without involving the police or children's social care should only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the education setting's pastoral support and disciplinary framework and, if appropriate, their local network of support.

The decision should be made by the DSL (or equivalent) with input from the education setting's headteacher/principal or manager and leadership team and input from other members of staff if

appropriate. The decision should be made and recorded in line with the education setting's safeguarding or child protection procedures and should be based on consideration of the best interests of any child or young person involved. This should take into account proportionality as well as the welfare and protection of any child or young person. The decision should be reviewed throughout the process of responding to the incident.

If doubts remain after following child protection procedures, local safeguarding arrangements should be followed.

2.4 Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL (or equivalent) should conduct a further review (including an interview with any child or young person involved) to establish the facts and assess the risks, referring back to any relevant assessment tools.

When assessing the risks and determining whether a referral is needed, the following should be also considered:

Why was the nude or semi-nude shared? Was it consensual or was the child or young person put under pressure or coerced?

Has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child or young person who produced the image?

Has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?

How old are any of the children or young people involved?

Did the child or young person send the nude or semi-nude to more than one person?

Do you have any concerns about the child or young person's vulnerability?

Are there additional concerns if the parents or carers are informed?

These questions will help the DSL (or equivalent) decide whether a child or young person is at risk of harm, in which case a referral will be appropriate, whether additional information or support is needed from other agencies or whether the education setting can manage the incident and support any child or young person directly. DSLs (or equivalent) should always use their professional judgement in conjunction with that of their colleagues to assess incidents.

[Annex B](#) provides further detail on why these questions should be used to complement and support the DSL's (or equivalent's) professional judgement.

2.5 Supporting the young person/people involved

Once a school has assessed a child or young person as not at immediate risk, it may be necessary to have a conversation with them and decide the best course of action. If possible, the DSL (or equivalent) should carry out this conversation.

However, if the child or young person feels more comfortable talking to a different member of staff, this should be facilitated where possible. It is important that the child or young person is given a sense of

control over the reporting process. The DSL (or equivalent) should support the member of staff to make sure the conversation is handled appropriately, and they feel confident in discussing the incident.

The purpose of the conversation is to:

- identify, **without viewing wherever possible**, what the image contains and whether anyone else has been involved
- find out whether the image has been shared between two people or shared further. This may be speculative information as images or videos may have been shared more widely than the child or young person is aware of
- discuss what actions and support might be needed, including preventing further distribution. This discussion should take into account the views of the child or young person as well as balancing what are considered to be appropriate actions for responding to the incident

When discussing the sharing of nudes and semi-nudes, it is important that the DSL (or equivalent)/member of staff:

- reassures the child or young person that they are not alone, and the education setting will do everything that they can to help and support them. They should also be reassured that they will be kept informed throughout the process
- recognises the pressures that children and young people can be under to take part in sharing an image and, if relevant, supports their parents and carers to understand the wider issues and motivations around this
- remains solution-focused and avoids any victim-blaming questions such as 'why have you done this?' as this may prevent the child or young person from talking about what has happened. For example, use questions such as 'describe what happened' or 'explain to me who was involved'
- helps the child or young person to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the image(s)
- discusses issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL or equivalent if this ever happens
- explains the law on the sharing of nudes and semi-nudes. It is important to highlight that the law is in place to protect children and young people rather than criminalise them and should be explained in such a way that avoids alarming or distressing them
- advises the child or young person to use the IWF and Childline's Report Remove tool to report an image that has been shared online: www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/. NCMEC's Take It Down tool can also be used to help them to anonymously remove nudes or semi-nudes that have yet to be shared online but they think might be (for example, in an incident where a young person has been threatened to have their image shared but threat has not yet been carried out): <https://takeitdown.ncmec.org>. (see [section 2.12](#) for further detail on reporting routes)

Children and young people who have had their nudes or semi-nudes shared publicly should be:

- reassured that they have done the right thing by speaking to an adult and that the education setting and other adults are there to help
- advised:
- to - delete images or videos from social media accounts (including from cloud photo backups) if they have uploaded them themselves
- to use the IWF and Childline's Report Remove tool to report an image that has been shared online: www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/. NCMEC's Take It Down tool can also be used to help

them remove or limit the spread of nudes or semi-nudes that have been shared online: <https://takeitdown.ncmec.org>. (see [section 2.12](#) for further detail on reporting routes)

- on how to report sexual images or videos on individual sites to get them taken down. If the image has been shared via a mobile, they should be informed that they can contact the mobile phone operator to have a mobile number changed as this may stop others from contacting them
- to speak to the school if they are concerned about any bullying behaviour

Children and young people who have been sent a nude or semi-nude should be:

- reassured that they have done the right thing by speaking out and that the education setting and other adults are there to help
- asked whether it was sent by an adult or another child or young person and if they requested the photo or if it was sent unsolicited
- advised:
 - on the importance of reporting it online if it has been shared
 - to delete it from their devices and accounts
 - on the importance of not sharing the image further
 - if they asked to receive the photos, explain that they should not put pressure onto others to do things that they are uncomfortable with

Children and young people who have shared another child's or young person's nudes or semi-nudes should be:

- asked:
 - whether they asked for the photo or were initially sent it without requesting
 - who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their phone or any social media accounts and reporting it to online service providers (see [section 2.12](#))
 - about their motivations for sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way. Emphasise that whatever the reason, it is always wrong to share nudes and semi-nudes of another child or young person. This can be used as an opportunity to discuss the importance of consent and not putting pressure on others to take or share nudes and semi-nudes
- advised on the law on the sharing of nudes and semi-nudes

Children and young people who have created a nude or semi-nude of another child or young person and shared it should be:

- asked:
 - who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their devices, any social media accounts and anywhere else it has been posted online such as group chats, and reporting it to online service providers (see [section 2.12](#))
 - about their motivations for creating and sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by creating or sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way. Emphasise that whatever the reason, it is always wrong to share nudes and semi-nudes of another child or young person. This can be used as an opportunity to discuss the importance of consent and how it still applies when nude and semi-nude has not been taken by the child or young person in it
 - advised on the law on the sharing of nudes and semi-nudes and how it still applies to digitally manipulated or AI-generated imagery of other children and young people

2.6 Informing parents and carers

Parents or carers should be informed and involved in the process at an early stage unless informing them will put a child or young person at risk of harm. Any decision not to inform the parents or carers should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.

Where appropriate, DSLs (or equivalents) should support any child or young person involved with determining the best approach for informing parents and carers and allow them to be a part of this process if they want to be.

2.7 Supporting parents and carers

Children and young people can be involved in an incident in several different ways. They may lose control of their own image, receive an image of someone else or share an image of another person. In any of these situations, parents and carers may find it difficult to know how to deal with the knowledge that their child has been involved in an incident and may display differing emotions.

Whatever their feelings, it is important that professionals listen to their concerns and take them seriously. It can also be helpful for staff members and the police or social care, to reassure parents and carers by explaining that it is normal for young people to be curious about sex.

In all situations, parents or carers should be:

- given information about the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the education setting
- given support to deal with their own feelings of upset and concern including signposting to further resources that can help them to understand the sharing of nudes and semi-nudes or support services they can contact, where appropriate
- given support on how to speak to their child about the incident
- advised on the law around the sharing of nudes and semi-nudes
- kept updated about any actions that have been taken or any support that their child is accessing, unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision
- informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline counsellor [online](#) or on 0800 11 11, in house counselling services where available, or a GP. If they are concerned that their child is suicidal, they should contact 999
- directed to [NCA-CEOP](#) if the child or young person discloses any further details to them that may suggest they are being groomed or sexually exploited

In addition to the advice above, parents and carers should be given the following advice and guidance for specific scenarios.

Parents/carers whose child has had their nudes or semi-nudes shared publicly should be:

- advised to:
 - stay calm and refrain from getting angry with their child
 - help their child delete images from social media accounts (included from cloud photo backups) if they have uploaded them themselves

- support their child use the IWF and Childline's Report Remove tool to report an image that has been shared online: www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety sexting/report-nude-image-online/. They can also help their child to use NCMEC's Take It Down tool to help them remove or limit the spread of nudes or semi-nudes that have been shared online: <https://takeitdown.ncmec.org>.
- report sexual images on individual sites to get them taken down. If the image has been shared via a mobile, they should be informed that they can contact the mobile phone operator to have a mobile number changed
- directed to services for Harmful Sexual Behaviour, such as the National Clinical Assessment and Treatment Service (an NSPCC service) or Shore (a Lucy Faithfull Foundation service, if there have been similar incidents or they are worried about inappropriate sexual behaviour for their age
- advised to speak to the education setting if they are concerned about any bullying behaviour

Parents/carers whose child has been sent nudes and semi-nudes should be advised to:

- listen to their child's concerns without criticising their decisions
- consider ways that their child could speak to the sender to stop future correspondences. Alternatively, if the child or young person prefers, informed about how to block the sender
- discuss issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Children can speak to school and/or parents/carers if this ever happens

Parents/ carers whose child has shared another child's nudes or semi-nudes should be advised to:

- stay calm and refrain from getting angry with their child
- discuss issues of consent and trust in healthy relationships or friendships. Talk about the types of things which are and aren't ok to share and how they would feel if someone shared a personal photo of them
- contact their child's education setting if they are concerned that their child is behaving in a sexually inappropriate way. They could also be directed to services for Harmful Sexual Behaviour, such as the National Clinical Assessment and Treatment Service, if appropriate, or if similar incidents have previously occurred

2.8 Multi-agency working

If it is necessary to report to the police, contact should be made through existing arrangements. This may be through the MASH or equivalent in the first instance, a safer schools officer, a Police Community Support Officer, local neighbourhood police, dialling 101 or 999 (where there is a threat to life^{[footnote 171](#)}).

Once a report is made to the police, it has to be recorded and the police will conduct an investigation. This may include taking devices and interviews with any child or young person involved.

Things to be aware of when making reports to the police:

1. Contact should be made through existing arrangements (such as the MASH or equivalent) if reporting to the police is necessary.
2. Be aware that the police are not able to offer general advice on incidents. If the child or young person involved are named or specifics are provided they are duty-bound to record and investigate

all criminal activity reported. This does not mean the child or young person will automatically have a criminal record when the crime is recorded.

3. If a report through the 101 service, be aware that the person answering the call is a call handler who deals with a wide variety of crimes and may not have specialist knowledge in this area. Ensure any crime reference numbers provided are recorded.
4. Safer Schools Officers (where available) are able to offer direct support to schools on prevention and advice on management of incidents.

2.9 Children's social care contact and referrals

The DSL (or equivalent) should contact children's social care if any child or young person involved is already known to them. For example, they may currently, or in the past, have been on an Early Help or Child Protection Plan.

If, because of the investigation, the DSL (or equivalent) believes there are wider issues which meet the threshold for children's social care involvement, they should make a referral in line with their safeguarding or child protection procedures.

DSLs (or equivalents) should ensure that they are aware of, and familiar with, any relevant local policies, procedures and contact points/names which are available to support education settings in responding to an incident.

If a local area has a MASH then this may be the most appropriate place for education settings to initially make a referral.

2.10 Searching devices, viewing and deleting nudes and semi-nudes

2.10(a) Viewing the imagery

Staff and parents or carers must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so as outlined below. Wherever possible, responses to incidents should be based on what DSLs (or equivalents) have been told about the content of the imagery.

It is important that all members of staff are clear on what they can and can't do in relation to viewing nudes and semi-nudes and that this is communicated to any child, young person or parent and carer requesting that imagery be viewed.

The decision to view any imagery should be based on the professional judgement of the DSL (or equivalent) and should always comply with the child protection policy and procedures of the education setting. Imagery should never be viewed if the act of viewing will cause significant distress or harm to any child or young person involved.

If a decision is made to view imagery, the DSL (or equivalent) would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved

- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent or carer in making a report
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network

If it is necessary to view the imagery then the DSL (or equivalent) should:

- never copy, print, share, store or save them; this is illegal. If this has already happened, please contact your local police for advice and to explain the circumstances
- discuss the decision with the headteacher or a member of the senior leadership team
- make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the headteacher or a member of the senior leadership team
- make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the headteacher or a member of the senior leadership team's office
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images
- record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. Ensure this is signed and dated and meets any appropriate wider standards e.g. such as those set out in statutory safeguarding guidance and local authority policies and procedures.
- if any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called. The device should be disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, for example in a locked cupboard or safe until the police are able to come and collect it.

Further details on searching, deleting and confiscating devices can be found in the DfE's [Searching, Screening and Confiscation](#) advice (note this advice is for schools only). Any procedures for searching, deleting, and confiscating devices should be included in the educational setting's safeguarding or child protection procedures. Children and young people, their parent and carers should be made aware of this procedure.

If nudes or semi-nudes have been viewed by a member of staff, either following a disclosure from a child or young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring school systems), DSLs (or equivalents) should make sure that the staff member is provided with appropriate support. Viewing nudes and semi-nudes can be distressing for both children, young people, and adults and appropriate emotional support may be required.

The [Searching, screening and confiscation advice for schools](#) highlights how the Education Act 2011 gives schools the power to search pupils for devices, search data on devices. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If during a search a teacher finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved.

2.10(b) Deletion of imagery

If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing.

In most cases, children and young people should be asked to delete the imagery and to confirm that they have deleted them. They should be given a deadline for deletion across all devices, online storage, or social media sites. They should be reminded that possession of nudes and semi-nudes is illegal. They should be informed that if they refuse or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence and the police may become involved.

Any decision to search a child or young person's device and delete imagery should be based on the professional judgement of the DSL (or equivalent) and should always comply with the safeguarding or child protection policy and procedures of the education setting. All decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed unless this presents a further risk to any child or the young person.

2.11 Recording incidents

All incidents relating to nudes and semi-nudes being shared need to be recorded. This includes incidents that have been referred to external agencies and those that have not. Incidents that have not been reported out to police or children's social care, education settings should record their reason for doing so and ensure it is signed off by the headteacher or setting's manager/leadership team. Please note copies of imagery should not be taken.

Records should be kept in line with statutory requirements set out in Keeping Children Safe in Education, where applicable, and your local safeguarding procedures.

2.12 Reporting nudes and semi-nudes online

Reporting routes for children and young people

Children and young people may need help and support with the removal of nudes and semi-nudes from devices and social media, especially if they are distressed. Most online service providers offer a reporting function for account holders, and some offer a public reporting function to enable a third party to make a report on behalf of the child or young person. More information can be found on individual providers' websites, platforms, or apps where they should make public their Terms of Service and process for reporting.

Children and young people can use Take It Down, a tool provided by the National Center for Missing and Exploited Children (an American child protection organisation), to help them anonymously remove nudes or semi-nudes that they believe have been or could be shared online. They can select the nude or semi-nude on their device and the tool will generate a 'hash' or digital fingerprint that can be used by online platforms such as Snapchat, TikTok and Instagram to identify exact copies of those images or videos. The service can be used even if the child or young person is unsure whether an image has been shared: <https://takeitdown.ncmec.org>

If a child or young person has had their nude or semi-nude shared online, they can use the IWF and Childline's Report Remove tool to report images, videos and URLs at www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/. The tool helps them to

see if it is possible to get the image removed. This must be done as soon as possible to minimise the number of people that have seen the picture.

Reporting routes for adults

Where an online service provider does not offer a public reporting function to enable third parties to make a report, adults can report a nude or semi-nude to the Internet Watch Foundation: www.iwf.org.uk.

2.13 Best practice responses to incidents

If you have reason to believe that a child or young person has been sexually abused, exploited, or groomed online, an immediate referral to police and/or children's social care should be made through the MASH or equivalent. Where there is a threat to life, you should dial 999.

If they do not have a trusted adult, children and young people can report grooming, sexual abuse and exploitation to the National Crime Agency: www.ceop.police.uk/safety-centre

2.14 Best practice responses to incidents

The case studies below demonstrate three examples of incidents and how an education setting may respond effectively to them following the guidance outlined in this section.

Further case studies can be found in [Annex C](#). These can be used in a training exercise with staff to help them identify the type of incident that has occurred and how to respond appropriately.

Case study A: Children and young people aged 13-18

A 15-year-old girl reported to her head of year she had consensually sent her boyfriend (another student, 16) a topless photo of herself. She has been told that her boyfriend has shown the photo to his friends and they are now posting comments about her being a 'slut' online. She was very upset and did not want to get into trouble for taking the photo. The head of year explained to her that what she had experienced was extremely serious and that they would need to speak to the DSL.

The DSL reassured the girl that she had done the right thing in speaking to her head of year and explained that the school needed to make sure she was safe and discussed the possible action the school would take. The DSL explained they would be following the school's child protection and behaviour policy and would speak to the boys involved and their parents. The girl was offered additional pastoral support. She agreed and her parents were contacted and given the opportunity to discuss the action the school planned to take.

The DSL spoke to the boyfriend who said he only told one friend about the photo. He did not show anyone the photo and did not forward it to anyone. The boys making comments online were spoken with separately; they all confirmed the boy had not shown them any photos and he had only discussed the photo with one other person. The DSL had no previous safeguarding concerns about any of the young people involved.

Result:

The boyfriend was spoken with about consent and trust within healthy relationships. His behaviour was discussed with his parents present and he was instructed to delete the images immediately from any devices, including his recently deleted folder.

The boys making comments online were spoken with about their behaviour with their parents present; it was made clear that their behaviour was unacceptable, and they received sanctions in line with the behaviour policy.

All boys involved were warned about the more severe consequences that would arise if the harassment continued or any images were shared again.

Everything was explained to the girl and her parents, who were happy with the action taken by the school. There have been no further incidents.

Case study B: Children and young people aged 13-18

A 14-year-old girl reported to a DSL she had been forwarded a naked photo of one of her friends, 13. Her friend had initially sent the photo to a boy, 15, that she liked who attends a nearby school. The DSL reassured the girl that she had done the right thing in speaking to her and explained that the school needed to make sure her friend was safe.

The school spoke to the DSL at the boys' school and they agreed to investigate. They stated the boy had been involved in nude image sharing concerns before.

The DSL spoke to girl who denied taking any images initially. She then said she had sent a photo to a boy she liked; however, she stated she was fully clothed. The girl had previously been known to social services due to concerns about a risk of exploitation and the school were concerned about her safety if naked images were being shared.

The DSL made the decision that it was necessary to view the photo as it was the only way to decide about whether to involve other agencies as conflicting information had been shared by the young people involved. The DSL discussed the decision with the headteacher and viewed the image in their office, with them present in the room. The DSL recorded their decision making regarding viewing the image. The DSL was able to confirm that the girl was naked in the photo and was masturbating.

The girl was spoken with again. She told the DSL that she had not told the truth before as she was worried she would be in trouble with the police. She stated that the boy had told her he would go out with her if she sent him naked photos. She was unaware the image had been shared and was very distressed.

Result:

The girl's parents were contacted and given the opportunity to discuss the action the school planned to take. The school reported the concern to the local MASH; it was agreed via a strategy discussion that social care and police would visit both schools to speak to the children involved and their parents and act, as necessary. The girl was provided with counselling and additional pastoral support in school.

Case study C: Children and young people under the age of 13

An 11-year-old boy reported to his class teacher that one of his friends took a photo of themselves naked and sent it to him last night. He was upset by the photo but had not told his parents in case they took his phone away. His teacher reassured him for speaking to them and explained that what he had been sent was not funny and that they would need to speak to the DSL to make sure everyone was safe.

The DSL reassured the boy that he had done the right thing for speaking to his teacher and explained they would be following the school's child protection and behaviour policy and would speak to the boy involved and his parents. The boy's parents were contacted and given the opportunity to discuss the action the school planned to take.

The DSL spoke to the boy who said he thought it was funny and he did not mean to upset his friend. He stated he had not sent the photo to anyone else. He said he realised it was not funny and that he should not send naked photos even as a joke. The DSL did not have any previous safeguarding concerns about the children involved.

Result:

His behaviour was discussed with his parents present and he was instructed to delete the images immediately from any devices, including his recently deleted folder. The boy was spoken with about appropriate behaviour and boundaries online and a safety plan was discussed and agreed with his parents, including appropriate supervision of devices at home.

These actions were explained to the other boy and his parents, who were happy with the action taken by the school. There have been no further concerns.

3. Educating children and young people

3.1 Why educate children and young people about the sharing of nudes and semi-nudes?

Teaching about safeguarding issues can prevent harm by providing children and young people with skills, attributes and knowledge to they need to identify risk online and access help when they need it. Addressing sensitive issues promotes a whole setting approach to safeguarding, giving children and young people the space to explore key issues and the confidence to seek the support of adults should they encounter problems.

Keeping Children Safe in Education states that schools and colleges 'should ensure children are taught about safeguarding, including online safety'.

Through compulsory Relationships Education for all primary-aged pupils and Relationships and Sex Education (RSE) for all secondary-aged pupils, all schools should provide opportunities for children and young people to learn about online safety and harms. This includes being taught what positive, healthy and respectful online relationships look like and, in secondary education settings, that sharing and viewing indecent images of children (including those created by children) is a criminal offence^{[\[footnote 18\]](#)[\[footnote 19\]](#)}.

Relationships Education and RSE play a key role in ensuring young people understand their right to be treated with respect in a relationship and how they should treat others with the same dignity and respect.

It is also an opportunity to open important conversations, not just with children, but with staff, parents and the wider community. Openly exploring topics such as understanding and recognising healthy and unhealthy behaviours and raising any worries or concerns with a trusted adult is a chance to educate communities and peer groups on what is normal or acceptable behaviour to support and protect children.

3.2 When and where should we teach children and young people about the sharing of nudes and semi-nudes?

In schools, learning about the sharing of nudes and semi-nudes should be located within the Relationships Education and Relationships and Sex Education curriculum, as well as the school's Computing programme where it should reflect the requirements of the National Curriculum programmes of study for Computing.

Education should be embedded across all year groups with learning made relevant to children and young peoples' online behaviour and experiences and matched to their readiness for new learning. Appropriate education on the basic principles of consensual image sharing can be delivered to primary-aged children, without the need to discuss the sharing of nudes and semi-nudes specifically.

All education settings can refer to the Education for a Connected World framework for age-specific advice on teaching about taking and sharing inappropriate images, including nudes and semi-nudes^{[\[footnote 21\]](#)}.

Education settings should also consider:

- what specific learning is provided in the curriculum about the sharing of nudes and semi-nudes? This focuses on factual information and will include:
 - what it is
 - how it is most likely to be encountered
 - the consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
 - issues of legality
 - the risk of damage to peoples' feelings and reputation
- what specific learning is provided to ensure children and young people have the strategies and skills required to manage:
 - specific requests or pressure to provide (or share on) such images
 - the receipt of such images

This will include who to tell; what to say; what to do; what not to do and where to get support from within and outside of the education setting.

It is important to recognise how difficult it may be for children and young people to challenge or deny their peers' requests for images, especially those to whom they are attracted or whose approval they seek. It may also be extremely difficult for them to ask adults for help. Children and young people may have made a decision they are worried about and may find it difficult or embarrassing to ask for help. It is essential that lessons help children and young people develop the confidence they may need to put their skills and strategies into action.

It is therefore important that children and young people understand their school's policy towards nudes and semi-nudes. The content of this policy and the protocols the school will follow in the event of an incident can be explored as part of this learning. This reinforces the inappropriate nature of abusive behaviours and can reassure children and young people that their school will support them if they experience difficulties or have concerns

- What underpinning protective learning is being provided by the school's curriculum? This will include work on:
 - communication
 - understanding healthy relationships including trust
 - understanding and respecting the concept of consent
 - understanding our rights (especially our collective right to be safe and to feel safe)
 - recognising and challenging abusive and coercive language and behaviours

- recognising and challenging victim blaming and harmful societal norms such as ‘slut-shaming’
- accepting our responsibilities (especially our responsibility to respect others trust and protect their right to be physically, emotionally and socially safe)
Without this underpinning learning, specific learning about the sharing of nudes and semi-nudes may have limited impact.

3.3 How can we deliver education safely?

Teaching should reflect best practice in delivering safe and effective education, including^{[footnote 22](#)}:

- **safeguarding first.** Make sure that the safety and wellbeing of each child comes first by establishing an emotionally safe learning environment and following the education setting’s safeguarding or child protection policies and procedures in the event of a disclosure
- **approach from the perspective of the child.** Before any new teaching, it is important to understand what being online means to children and young people and their relationships and explore the positive opportunities it presents, as well as the risks
- **promote dialogue and understanding.** Children and young people feel safest when they are listened to and understood – and know that they can ask trusted adults for help when they need it
- **empower and enable children and young people.** Children and young people have the right to be protected from harm, and to be supported to build knowledge, skills and confidence which will help them identify risk and access support when they need it
- **never frighten or scare-monger.** Alarmist education can be risky or worse, counterproductive. Avoid shocking or scaring children and young people, their families or other professionals
- **challenge victim-blaming attitudes.** Some children, young people and adults may express victim-blaming attitudes around the sharing of nudes and semi-nudes. These should be challenged in a constructive and supportive way that encourages them to think critically about the language they use.

Teaching should also reflect the principles articulated in ‘Key principles of effective prevention education’ - produced by the PSHE Association on behalf of NCA-CEOP^{[footnote 23](#)}.

3.4 Using external expertise

The use of external expertise such as visitors to support education around the sharing of nudes and semi-nudes can provide significant benefits to education settings however their use should be carefully considered to ensure they are effective^{[footnote 24](#)}. External visitors should be used to add value to a setting’s existing provision rather than to deliver education in isolation.

It is important to consider:

- whether you are clear as to why an external visitor is going to benefit your education approach? How will the input build on or help develop knowledge and skills, what will they be able to deliver that cannot be achieved by staff alone?
- what long-term impact will the input have on your setting’s community?

- whether you are confident the external speaker has the required skills and knowledge to present the information to the selected audience? Where do they get their information from, what is their evidence base, and have you checked to ensure the person delivering the session is not planning to use fear/scare tactics and/or victim blaming approaches?
- how will you safeguard the visitor and your setting's community will be safeguarded, including ensuring that:
 - the external visitor is briefed on the setting's child protection policies procedures, and expectations
- there are clear procedures for dealing with queries, concerns or safeguarding allegations raised during or following the session
- any children and young people or adults who could be upset or distressed by the input have been identified
- how will their input be evaluated and their impact be assessed?

For further guidance on using external visitors, see:

- Using external expertise to enhance online safety education: guidance for education settings (UKCIS) at www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings
- Police In The Classroom: a handbook for police and PSHE teachers (PSHE Association and NPCC) at <https://pshe-association.org.uk/policing>



AL-MADANI

3.5 What resources are available?

The following organisations provide resources and guidance that education settings may find helpful when planning education opportunities and supporting children and young people:

- **Barnardos**: Barnardos run specialist services for children and young people who have engaged in harmful sexual behaviour or are at risk of or experiencing child sexual abuse and exploitation
- **Childline**: Childline is a free, private, and confidential service where children and young people can talk about anything either on the phone or online. Childline provides information and advice on a range of topics including nudes and semi-nudes and, with the IWF, offers Report Remove, a tool to help under 18s in reporting images and videos to get them removed from the internet. Childline also includes online safety advice for d/Deaf children and young people
- **Childnet**: Childnet provides free online safety information, advice and educational resources for young people, professionals and parents and carers. This includes session plans on online sexual harassment, healthy relationships and the sharing of nudes and semi-nudes. Learning resources for children and young people with special educational needs and disabilities (SEND) are also available
- **LGfL - (London Grid for Learning)** (sexting.lgfl.net): LGfL offers training and free safeguarding and online safety education resources for educational settings, including informative posters for staff and children and young people and a teaching resource for primary-aged children from Early Years to Key Stage 2 about not getting changed or undressed on camera or when using a device
- **CEOP Education** (www.thinkuknow.co.uk): CEOP Education is the online safety education programme from the National Crime Agency. It provides information and advice for parents and carers and children and young people on sex, relationships, and the internet. Professionals can also access free educational resources that explore the sharing of nudes and semi-nudes, healthy and unhealthy relationships, harmful sexual behaviours, and online sexual abuse
- **NSPCC**: The NSPCC provides training and guidance for professionals and advice for parents and carers across a range of child safeguarding topics. The NSPCC also provides services that

work to protect children against sexual abuse and free teaching resources and lesson plans that explore healthy relationships, concerning or abusive behaviour, and sharing images online. Learning resources for children and young people with SEND are also available

- [PSHE Association](#): The PSHE Association provides advice, training and resources in PSHE education, including relationships and sex education. Its programme of study for England sets out how key learning objectives around healthy relationships, consent and abuse should be addressed within the curriculum
- [South West Grid for Learning – ProjectEVOLVE](#): South West Grid for Learning's (SWGfL's) ProjectEVOLVE educational resources explore the strands of the Education for a Connected World framework. These include activities on healthy and unhealthy online sexual behaviour, sharing images and consent. SWGfL also offer resources for children and young people with SEND and information and advice for educational professionals, including the [Professionals Online Safety Helpline](#)
- [UKCIS](#): The UK Council for Internet Safety is a collaborative forum through which government, the tech community and third sector work together to ensure the UK is the safest place in the world to be online. To support education professionals, it has published the Education for a Connected World framework which sets out the knowledge and skills children and young people should have the opportunity to develop in areas such as online relationships and self-image and identity

Annex A: Assessing adult-involved incidents – further information

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and require an immediate referral to police/social care through the MASH or equivalent. However, as adult-involved incidents can present themselves as child-on-child nude/semi-nude sharing, DSLs or equivalents may find it difficult to initially assess adult involvement.

This section outlines two types of common adult-involved incidents and signs to look out for.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from children and young people using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chat rooms or on gaming platforms and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made^[25]. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Signs to be aware of

Potential signs of adult-involved grooming and coercion can include the child or young person being:


- contacted by an online account that they do not know but appears to be another child or young person
- quickly engaged in sexually explicit communications which may include the offender sharing unsolicited images
- moved from a public to a private/E2EE platform
- coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- offered something of value such as money or gaming credits
- moved from a public to a private/E2EE platform
- threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents – 'sextortion'

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them. Throughout 2022 and 2023, there has been a considerable increase in reporting of these incidents.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- 
- groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
 - use images that have been stolen from the child or young person taken through hacking their account
 - use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Signs to be aware of

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- quickly engaged in sexually explicit communications which may include the offender sharing an image first
- moved from a public to a private/E2EE platform

- pressured into taking nudes or semi-nudes
- told they have been hacked and they have access to their images, personal information and contacts
- blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Further information on 'sextortion' can be found here:

- National Crime Agency – www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/kidnap-and-extortion/sextortion-webcam-blackmail
- Internet Watch Foundation – www.iwf.org.uk/resources/sextortion

Annex B: Questions to support assessment

When deciding whether to involve the police and or children's social care, consideration should be given to the following questions. Answering these questions will support the DSL (or equivalent) in considering whether a young person is at risk of harm, in which case a referral will be appropriate, whether additional information or support is needed from other agencies or whether the school can manage the incident and support the young people directly.

Do you have any concerns about the young person's vulnerability?

Why this question?

Consideration should be given to whether a child or young person's circumstances, background or sexuality makes them additionally vulnerable. This could include:

- being in care
- having special educational needs or disability
- having been a victim of abuse
- having less direct contact with parents
- lacking positive role modelling at home

Where there are wider concerns about the care and welfare of a child or young person then consideration should be given to referring to children's social care

Why were the nudes and semi-nudes shared? Was the young person put under pressure or coerced or was consent freely given?

Why this question?

Children and young people's motivations for sharing nudes and semi-nudes include flirting, developing trust in a romantic relationship, seeking attention or as a joke.

Though there are clearly risks when children or young people share images consensually, those who have been pressured to share nudes and semi-nudes are more likely to report negative consequences.

A referral should be made to the police if a child or young person has been pressured or coerced into sharing an image, or images have been shared without consent and with malicious intent.

Consideration should also be given to a child or young person's level of maturity and the impact of any special educational needs or disability on their understanding of the situation.

Action should be taken, in accordance with the setting's behaviour policy, with any child or young person who has pressured or

coerced others into sharing nudes and semi-nudes. If this is part of pattern of behaviour then a referral to a Harmful Sexual Behaviour service should be considered, such as the National Clinical Assessment and Treatment Service (an NSPCC service).

Have the nudes and semi-nudes been shared beyond its intended recipient? Was it shared without the consent of the young person who produced the images?

| Why this question? | | If the nudes and semi-nudes have been shared widely on online, this could cause significant embarrassment and distress for the child or young person. It could also increase the risk of them being bullied or contacted by strangers online. The child or young person should be supported to report the imagery to any sites it is hosted on. Information on reporting in [section 2.12](#).

If the child or young person has tried to report the imagery and it has not been removed the young person should use the IWF and Childline's Report Remove tool: <https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety sexting/report-nude-image-online/>.

The Professionals Online Safety Helpline for further advice and support by calling 0844 381 4772 or visiting www.saferinternet.org.uk/helpline/professionals-online-safety-helpline.

If the child or young person discloses any further details to them that may suggest they are being groomed or sexually exploited, parents and children can report to the NCA's CEOP Safety Centre: www.ceop.police.uk/safety-centre |

How old is the young person or young people involved?

Why this question?

Children under 13 are dealt with differently under the Sexual Offences Act 2003. This law makes it clear that children of this age can never legally give consent to engage in sexual activity. This applies to children who have not yet reached their 13th birthday i.e. children who are aged 12 and under.

Further action must be taken where an incident involves children under 13 and sexual acts as it is potentially indicative of a wider safeguarding or child protection concern or as being problematic sexual behaviour.

In some cases, children under 13 (and indeed older) may create nudes and semi-nudes as a result of age appropriate curiosity or risk-taking behaviour or simply due to naivety rather than any sexual intent. This is likely to be the behaviour more commonly identified within primary education settings. Some common examples could include sending pictures of their genitals to their friends as a dare or taking a photo of another child whilst getting changed for PE. Within this context, it is unlikely that police or social care involvement is required or proportionate, but DSLs will need to use their professional judgement to consider the specific context and the children involved.

Being older can give someone power in a relationship, so if there is a significant age difference it may indicate the child or young person felt under pressure to take the nudes and semi-nudes or share it.

Consideration should also be given to a child or young person's level of maturity and the impact of any special educational needs or disability on their understanding of the situation.

If the nudes and semi-nudes are believed to contain acts which would not be expected of a child or young person of that age, it should be referred to police through the MASH or equivalent. The Brook Traffic Light tool provides guidance on harmful sexual behaviour at different ages.

Did the young person send nudes and semi-nudes to more than one person?

Why this question?	<p>If a child or young person is sharing nudes or semi-nudes with multiple people, this may indicate that there are other issues which they need support with such as self-esteem and low confidence or harmful sexual behaviour. Consideration should be given to their motivations for sharing.</p> <p>A referral to children's social care should be made if there are wider safeguarding concerns.</p>
--------------------	--

Does the young person understand the possible implications of sharing the nudes and semi-nudes?

Why this question?	<p>Children and young people may produce or share nudes and semi-nudes without fully understanding the consequences of what they are doing. They may not, for example, understand how it may put them at risk or cause harm to another child or young person. They may also not understand consent.</p> <p>Exploring their understanding can help in assess whether the child or young person passed on an image with deliberate intent to harm and plan an appropriate response.</p>
--------------------	---

Are there additional concerns if the parents or carers are informed?

Why this question?	<p>Parents or carers should be informed of incidents of this nature unless there is good reason to believe that informing them will put the young person at risk. This may be due to concerns about parental abuse or cultural or religious factors which would affect how they or their community would respond.</p> <p>If a child or young person highlights concerns about involvement of their parents or carers, then the DSL (or equivalent) should use their professional judgment about whether it is appropriate to involve them and at what stage. If the education setting chooses not to involve a parent or carer they must clearly record the reasons for not doing so.</p> <p>Where possible, children and young people should be supported to speak with their parents or carers themselves about the concerns.</p>
--------------------	---

Annex C: Training exercise

Exercise instruction sheet

This exercise may be used by a DSL (or equivalent) with staff to explore the issues around responding to incidents of nudes and semi-nudes being shared by children and young people.

It is designed to illustrate a range of incidents and highlight that an appropriate and proportionate response needs to be considered for each incident.

Instructions to trainer

Resources required:

- Resource Sheet 1 – typology definitions (1 per delegate)
- Resource Sheet 2 – case studies (1 per group)
- Resource Sheet 3 – response (1 per delegate)
- Coloured card – 6 colours
- Sticky tack

Preparation:

A - Prepare a set of case study cards per group. This takes a little time but the cards can be reused. If preferred, you may wish to use anonymised case studies that you are aware of and able to discuss the outcome.

The 14 case studies (Resource sheet 2) match the six typology categories as follows:

- Aggravated Adult (case studies 8 & 9)
- Aggravated Youth Intent to Harm (case studies 1, 2, 7 & 10)
- Aggravated Youth Reckless misuse (case studies 3, 4,)
- Experimental Romantic (case studies 6, 11)
- Experimental Attention Seeking (case studies 5, 12 & 13)
- Experimental Other (case study 14)

Assign a distinctive coloured card to each of the six categories above, then cut and mount each of the 14 case studies accordingly.

B - Prepare 6 white 'header' cards for wall mounting – each card should display the title of one of the typologies.

Activity:

1. Divide delegates into groups of 3-4. Where appropriate, mix delegates to include a wide range of experience / job role etc.
2. Give each group a set of case study cards (all 14 if time permits, if not then ensure that they have at least one of each colour).
3. Instruct delegates to read each case study and consider the following questions as a group:
 - what level of risk do they think is attached to each case – green/red/amber
 - what should the action of the education setting be?
 - at this stage which of the case studies would they report to police and or social care?

At this stage, ask delegates to discuss a simple outline/ plan of action - no more than 3 mins per case.

4. Give each group member a copy of Resource Sheet 1 and discuss with them Finkelhor's typology. Finkelhor's typology will help them to define the kind of incident and will also help them to decide on the appropriate and proportionate response.

5. Give each delegate a copy of Resource Sheet 3 and ask them as a group to decide for each case study which typology category they would assign to it. Record any comments on their sheets.

6. Whilst delegates are working, stick the 6 'header' cards around the room.

7. When delegates have categorised each of their case studies, ask them to post the cards on the wall under the appropriate 'header' card around the room. (It becomes apparent quite quickly that the colours match up in groups and show where groups agree/disagree on categorisation).

8. Comment on where there has been agreement/disagreement to pull out variation in group thinking.

9. Pull out a variety of incidents that reflect the different typologies, for example romantic, attention seeking, aggravated adult, and ask delegates to consider the following:

- do any of the case studies reflect any of the five points for immediate referral to other agencies?
- if they do, which external agency should they be reported to and why?
- if they don't need to be reported to an external agency, why not?

10. Where there are case studies that don't hit the referral threshold ask the groups to consider their response. This should take into account how they would respond. They should consider the following:

- how would the child or young person be supported?
- how would parents or carers be informed?
- how would the deletion and removal of the images be handled?
- how would the incident be recorded?
- how would take the lead in managing the incident?
- what would follow after the management of the incident?

11. Allow for discussion in small groups on these topics and, where possible, ask them to refer to the main body of the advice. Draw out any key elements for discussion and take the opportunity to remind staff of any relevant policies and procedures in managing incidents of nudes and semi-nudes being shared.

Resource Sheet 1

(Adapted from Wolak and Finkelhor 'Sexting: a Typology' March 2011)

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of youth-produced sexual images

Adult offenders attempt to develop relationships by grooming teenagers, in criminal sex offenses even without the added element of youth-produced images. Victims may be family friends, relatives, community members or contacted via the Internet. The youth-produced sexual images may be solicited by adult offenders.

Youth Only: Intent to Harm cases that:

- arise from interpersonal conflict such as break-ups and fights among friends
- involve criminal or abusive conduct such as blackmail, threats or deception
- involve sexual abuse or exploitation by young people.

Youth Only: Reckless Misuse

No intent to harm but images are taken or sent without the knowing or willing participation of the

young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.

Experimental incidents involve the creation and sending of youth-produced sexual images, with no adult involvement, no apparent intent to harm or reckless misuse.

Romantic episodes in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair.

Sexual Attention Seeking in which images are made and sent between or among young people who were not known to be romantic partners, or where one young person takes pictures and sends them to many others or posts them online.

Other. Cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

Resource Sheet 2: Case studies

(Includes case studies adapted from Wolak and Finkelhor)

Case study 1

A pupil in Year 12 confides in a friend that she shared nude images with her boyfriend who has just turned 18 and is in Year 13. They have recently split up and the girl has asked for the images to be deleted – the boy has refused, and the girl is worried that he might show them to his friends.

Case study 2

Two 16-year-old males are in a relationship and have faced some homophobic abuse online. This has culminated in their heads being digitally manipulated onto pornographic images which have been shared. One of the boys confided in a member of staff about what had happened. On investigation, it becomes clear that they have exchanged nude images with each other. Another young person claims to have a copy of the image (although there is no proof of this) and has threatened to share it. One of the two boys is worried that if his family find out about his relationship there could be “serious consequences for us both”.

Case study 3

A 13-year-old boy sent one picture of himself masturbating to another pupil in his class. The pupil was shocked and shared the image with two others asking for their advice and what to do. One of the pupils showed the image to their parents who have emailed it to the form tutor at school demanding that something be done.

Case study 4

Two 16-year-olds were having sex at a party – someone took a photo and shared it online. One of the 16-year-olds is really distressed and has allegedly tried to self-harm. The two 16-year olds have had no previous safeguarding concerns and have been in a relationship for some time.

Case study 5

The DSL at a neighbouring school calls to explain that they are aware of a local ‘competition’ between children to see what are the riskiest videos that they can upload to social media sites without getting them reported and removed. Apparently a girl from your school has posted content of herself in her underwear simulating oral sex. The DSL has not seen any of this content but has been told by their pupils. When you speak to the pupil she insists this is not true and that she is fully clothed in any content.

Case Study 6

An 11-year old boy sent a nude photo of himself to his 12-year-old girlfriend (an ex pupil). No physical sexual activity took place between them prior to this event online or offline. The image was discovered on the girl’s mobile phone by her mother who deleted the image and contacted the boy’s parents. The boy’s

parents approached the education setting for advice. He said it was meant as a joke and that no physical sexual activity took place between them prior to this event online or offline.

Case Study 7

A girl, 15, sent a topless photo of herself to her girlfriend, who was also 15. When they broke up, the girl sent the photo to numerous friends and many recipients forwarded the image to others. The education setting found out when one recipient told a parent. By then over 200 students had received the picture.

Case Study 8

The parents of a 14-year old girl found nude pictures of her on her mobile device and approached her school for advice. She admitted sending the pictures to a 37-year old man she met online. The girl stated she was in love with him and he lived in another part of the country. They have never met face-to-face.

Case Study 9

A 17-year old boy sent nude images of himself to a man he had met online through a dating platform who had requested them. The man continued to ask for more, threatening to leak the photos he had already received. The boy told his friend who then reported it to a member of staff in the education setting.

Case study 10

A 13-year old girl took nude images of her 3 younger sisters (ages 5, 6 & 8) and touched them sexually. A classmate disclosed this information to their class teacher. Children’s social care had been involved with the family for some time.

Case Study 11

Parents approached the school when they discovered their son, 16, had received a video of a 17-year-old boy masturbating. Their son is gay and in a relationship with the other boy who he knows through school. His parents were upset about his sexual orientation.

Case Study 12

A boy, 15, sent unsolicited naked pictures of himself to three different girls in his school. One of the girls reported it to their class teacher.

Case Study 13

A girl, 17, posted nude pictures of herself on a social networking site. The website identified the images as possible child abuse images, removed them and reported the incident to NCA-CEOP, which referred the report to the local police force. The police approached the school and talked with the girl, but no further action was taken.

Case Study 14

An 11-year-old girl took pictures of her breasts with her mobile phone. Her parents discovered the images and brought the phone to school. The girl, when spoken to, admitted she took the pictures of herself to see if she looked ‘normal’. She said she had not sent them to anyone.

Case Study 15

A 16-year-old boy has reported to their class teacher that there are nude images of him circulating in a group chat, which he did not take or share. He had recently had a fight with the classmate who had initially posted them in the group and believes he used an AI tool to generate them.

Annex D: Table of substantive changes from Sharing nudes and semi-nudes (2020 version)

Where	What
Whole document	

Guidance expanded to cover nude image sharing incidents involving AI-generated images and financially motivated sexual extortion (commonly known as 'sextortion')

Section 1

1.2 What does this advice cover? Updated definition of the types of incidents the advice covers to reflect the inclusion of adult-aggravated incidents which may initially appear as child-on-child due to the offender posing as a child

1.5 Why does this matter to settings working with children? New research added covering:

- The prevalence of nude image sharing incidents
- The impact of non-consensual sharing and online child sexual abuse

1.6 Understanding motivations and behaviours New examples of image sharing incidents to reflect the use of AI-generated material and sharing with adults that pose as a child to sexually abuse or financially blackmail them

1.6(a) Defining the incident Adult involved description updated to reflect financially motivated sexual extortion incidents

1.7 The law Updated definition of indecent images of children to include 'pseudo-images'

1.9 The police response Reference added to updated operational advice for law enforcement

1.9(d) Seizure of devices New guidance added on the seizure of devices by police, including when it may happen and what will happen to seized devices and images

Section 1

Section 2

2.3 Initial review meeting Additional advice outlining that adult-involved incidents may initially present as child-on-child

2.5 Supporting the young person/young people involved New guidance added covering:

- responding to incidents involving AI-generated or digitally manipulated nudes and semi-nudes
- the use of NCMEC's Take It Down tool to remove nudes or semi-nudes that may have been or could be shared online

2.5 Supporting parents and carers New guidance added covering:

- responding to incidents involving AI-generated or digitally manipulated nudes and semi-nudes
- the use of NCMEC's Take It Down tool to remove nudes or semi-nudes that may have been or could be shared online

2.12 Reporting nudes and semi-nudes online Updated and additional guidance on reporting routes for children and young people, and reporting routes for adults

2.13 Reporting online child sexual abuse New section added with guidance on reporting online child sexual abuse

Section 3

3.3 How can we deliver education safely Link added to UKCIS' 'Challenging victim blaming language and behaviours' guidance

Section 1

3.4 Using external visitors	Amended guidance on using external visitors to add value to a setting's provision based on the UKCIS 'Using External Visitors to Support Online Safety Education' guidance
-----------------------------	--

3.3 How can we deliver education safely	New guidance added on best practice in delivering safe and effective education
---	--

3.4 Using external visitors	New guidance added on working with external visitors
-----------------------------	--

3.5 What resources are available?	Updated links to organisations.
-----------------------------------	---------------------------------

Annex

Annex A	<p>A new annex added with information on assessing adult-involved incidents. It sets out signs to be aware of relating to:</p> <ul style="list-style-type: none">- Sexually motivated incidents- Financially motivated incidents – often known as 'sextortion'
---------	---

Annex C	New and amended case studies reflecting financially motivated incidents and the use of AI-generated nudes and semi-nudes
---------	--

1. 'Schools and educational establishments' refers to schools and colleges and includes: maintained schools and colleges, independent schools (including academies, free schools), alternative provision academies and non-maintained special schools and Pupil Referral Units. [↪](#)
2. [Online sexual harassment: comprehensive guidance for education settings](#), School of Sexuality Education et al, 2020. [↪](#)

3. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence and anyone of any gender can be a victim. [↵](#)
4. Not Just Flirting: the unequal experiences and consequences of nude image-sharing by young people, Revealing Reality, 2022. Available at: <https://revealingreality.co.uk/not-just-flirting/> [↵](#)
5. Understanding online communications among children, Ofcom. 2023. Available at: <https://www.ofcom.org.uk/research-and-data/online-research/online-comms-among-children> [↵](#)
6. Evidence Review on Online Risks to Children, NSPCC et al., 2023. Available at: <https://learning.nspcc.org.uk/research-resources/2023/online-risks-to-children-evidence-review> [↵](#)
7. Protecting children from online abuse, NSPCC. Available at: <https://learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse> [↵](#)
8. Consent is defined as an agreement made by choice, whereby an individual has the freedom and capacity to make that choice. This is outlined in s.74 of the Sexual Offences Act 2003. This mean the child or young person must have the capacity (i.e. the age and understanding) to make the choice and be in the position to make that choice freely without exploitation, threat, or fear. [↵](#)
9. Available at: <https://scholars.unh.edu/ccrc/48>. [↵](#)
10. Financially Motivated Sexual Extortion (often referred to as 'sextortion') usually involves online blackmail, where offenders threaten to release sexual/indecent images of an individual, unless they pay money or do something else to benefit them. This should be reported to the police by calling 101 (or 999 if there is a threat to life) [↵](#)
11. Taken from [Harmful sexual behaviour framework](#), NSPCC. [↵](#)
12. For relevant legislation in Scotland, see Civic Government Act 1982 and Criminal Justice Act 1988. For relevant legislation in Northern Ireland, see Protection of Children Order 1978 and Sexual Offences Order 2008. [↵](#)
13. <https://www.cps.gov.uk/legal-guidance/indecent-and-prohibited-images-children> [↵](#)
14. Growing Up, Moving On – The International Treatment of Childhood Criminal records, Alliance for Youth Justice (previously known as the Standing Committee on Youth Justice), 2016. Available at: <https://www.ayj.org.uk/news-content/the-international-treatment-of-childhood-criminal-records-a-comparison-of-16-jurisdictions> [↵](#)
15. 'Threat to life' can include serious sexual assault and/or rape [↵](#)
16. Keeping Children Safe in Education, Department for Education. Available at: <https://www.gov.uk/government/publications/keeping-children-safe-in-education-2> [↵](#)
17. 'Threat to life' can include serious sexual assault and/or rape [↵](#)
18. Relationships Education, Relationships and Sex Education and Health Education: statutory guidance for governing bodies, proprietors, head teachers, principals, senior leadership teams, teacher, Department for Education, 2019. Available at: www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education [↵](#)
19. Teaching online safety in school, Department for Education, 2019. Available at: www.gov.uk/government/publications/teaching-online-safety-in-schools [↵](#)
20. Values taken from the NCA's CEOP Education programme. Available at: www.thinkuknow.co.uk/professionals [↵](#)

21. Key principles of effective prevention education, NCA-CEOP and the PSHE Association, 2016. Available at: www.pshe-association.org.uk/curriculum-and-resources/resources/key-principles-effective-prevention-education ↵
22. External expertise is the use of visitors or speakers who are not regular staff members, or the use of externally provided resources to support the planned delivery of any curriculum or awareness raising activity. For example, this could include the police, independent consultants, visitors representing national or local organisations, or resources provided by external organisations. ↵
23. End-to-end encryption is a secure communication system where messages can only be seen by the sender and receiver. This means that social media companies that implement this technology on their platforms, without other safety measures, are unable to detect and report child sexual abuse material. Platforms such as Facebook Messenger, Instagram, Whatsapp and Telegram are end-to-end encrypted. ↵



AL-MADANI
INDEPENDENT
GRAMMAR SCHOOL