Sharing of Nude or Semi-Nude Images Policy

Signed:

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Collective Vision Trust

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Collective Vision Trust
Sharing of Nude or Semi-Nude Images Policy

Statement of intent

This policy applies to all schools that are part of Collective Vision Trust.

Collective Vision Trust is committed to safeguarding and supporting all pupils and staff both inside and outside of school. The school recognises that incidents involving the making or sharing of nudes and semi-nudes, including images that have been generated or altered using artificial intelligence (AI), can have serious safeguarding, wellbeing and legal implications for all those involved.

The school takes a whole-school approach to preventing, identifying and responding to incidents involving the making or sharing of nudes and semi-nudes. All concerns will be handled promptly, proportionately and in accordance with statutory safeguarding guidance, with the welfare of the children involved at the centre of all decisions.

This policy provides a clear and consistent framework for preventing and responding to incidents involving the making or sharing of nudes and semi-nudes. It sets out the responsibilities of the governing board, the headteacher, the DSL and all staff, and supports the school in ensuring its procedures are transparent, understood by staff, pupils and parents, and implemented consistently. This policy also supports the school in educating pupils about respectful behaviour, healthy relationships, online safety and the risks associated with creating, possessing or sharing nudes or semi-nudes.

Please note that the policy uses the term 'headteacher' to refer to the legally named headteacher on GIAS. If a school has a structure that has an Executive Headteacher and Head of School, 'headteacher' will refer to Executive Headteacher unless otherwise stated.

1. Legal framework

This policy has due regard to all relevant legislation, good practice and statutory guidance including, but not limited to, the following:

- Department for Science, Innovation and Technology and Sport and UK Council for Internet Safety 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- Department for Science, Innovation and Technology and Sport and UK Council for Internet Safety 'Sharing nudes and semi-nudes: how to respond to an incident (overview)'
- DfE 'Keeping children safe in education'
- DfE 'Working together to safeguard children'
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- The UK General Data Protection Regulation (UK GDPR)
- Voyeurism (Offences) Act 2019
- Protection of Children Act 1978
- Sexual Offences Act 2003
- Criminal Justice and Courts Act 2015
- Children's Wellbeing and Schools Act 2026

This policy operates in conjunction with all other Trust and School Policies.

2. Roles and responsibilities

The headteacher is responsible for:

- Safeguarding pupils' wellbeing.
- Ensuring staff receive appropriate safeguarding training on responding to incidents involving the making or sharing of nudes and semi-nudes.
- Providing parents with suitable information and support on the making or sharing of nudes and semi-nudes, including AI-generated and AI-altered images.
- Liaising with the DSL on any incidents involving the making or sharing of nudes and semi-nudes and supporting the DSL in the decisions they make regarding the incidents.
- Ensuring that relevant policies and procedures are followed by staff members.
- Ensuring that, upon induction, new staff members are provided with copies of the policies and procedures they need, including the Child Protection and Safeguarding Policy, and at least Part one of KCSIE.

The trust board is responsible for:

- Ensuring the headteacher has effectively implemented this policy.

- Monitoring the effectiveness of the procedures set out in this policy and its implementation across the school.
- Facilitating a whole-school approach to responding to incidents involving the making or sharing of nudes and semi-nudes; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Ensuring that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to handling incidents involving the making or sharing of nudes and semi-nudes.
- Ensuring the school has clear systems and processes in place for identifying possible safeguarding issues, including clear routes to escalate concerns and clear referral and accountability systems.
- Ensuring that appropriate filtering, monitoring and online safety arrangements support the school's approach to preventing incidents involving the making or sharing of nudes and semi-nudes.

Staff are responsible for:

- Ensuring pupils are fully informed and are aware of suitable support systems regarding the making or sharing of nudes and semi-nudes.
- Safeguarding pupils' wellbeing in relation to the making or sharing of nudes and semi-nudes.
- Providing a safe environment in which pupils can learn.
- Being alert to the indicators of abuse, exploitation and online harm, and recognising that incidents involving the making or sharing of nudes and semi-nudes may be a sign that a child is at risk of abuse.
- Maintaining appropriate levels of confidentiality when dealing with individual cases.
- Always acting in the best interest of the child in their respective cases.
- Reporting all concerns relating to the making or sharing of nudes and semi-nudes to the DSL (or deputy DSL) immediately.
- Adhering to the procedures set out in this policy.
- Promoting dialogue and understanding, and ensuring all pupils feel listened to and understood.
- Helping pupils understand the importance of respectful relationships, consent, privacy and the risks associated with creating, possessing or sharing nudes and semi-nudes, including AI-generated or AI-altered images.
- Avoiding victim-blaming attitudes and challenging it in a professional way if it occurs.

The SENCO is responsible for:

- Liaising with the DSL, headteacher, and relevant staff members when responding to incidents involving pupils with SEND.
- Considering and enacting the appropriate arrangements for SEND pupils involved in incidents relating to the making or sharing of nudes or semi-nudes.

The DSL is responsible for:

- Initiating and managing initial responses to incidents involving the making or sharing of nudes or semi-nudes, in conjunction with relevant staff members, and in relation to the Child Protection and Safeguarding Policy.

- Organising and managing initial review meetings to consider evidence and establish risk.
- Handling referrals to children's social care and/or the police.
- Deciding the eventual response to any incidents in conjunction with the headteacher.
- Determining whether it is necessary and appropriate to view a nude or semi-nude image, in accordance with UKCIS guidance and the Child Protection and Safeguarding Policy.
- Conducting interviews with pupils involved in incidents, with relevant staff members.
- Recording details of incidents in line with the Records Management Policy.
- Ensuring that all children involved receive appropriate safeguarding and pastoral support, and that they understand the risks associated with creating, possessing or sharing nudes and semi-nudes, including AI-generated or AI-altered images, in an age-appropriate manner.
- Considering whether AI-generated or AI-altered images form part of an incident and ensuring these are assessed and managed in line with this policy and the Child Protection and Safeguarding Policy.

3. Definitions

"Making or sharing of nudes and semi-nudes" refers to the creation or sharing of nude or semi-nude images, videos or live streams involving children under the age of 18. This includes content shared online, offline, through messaging services, social media, gaming platforms, live streaming services or by direct device-to-device transfer. It also includes images that have been generated or altered using AI.

"Nudes and semi-nudes" refers to nude or semi-nude images, videos or live streams involving one or more children under the age of 18. The term is used throughout this policy in line with current statutory guidance.

"Indecent imagery" is the legal term used to describe images of anyone under the age of 18 that are considered indecent. Creating, possessing or distributing indecent images of a child is a criminal offence. This policy uses the safeguarding term **"making or sharing of nudes and semi-nudes"**, except where referring to specific legal offences or legislation.

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 in a sexually explicit manner.
- 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

"**Image-based sexual abuse**" refers to the creation, possession, sharing or threatened sharing of nude or semi-nude images without consent, including images that have been generated or altered using AI.

This policy uses the term **"making or sharing of nudes and semi-nudes"** throughout, in line with current statutory guidance. Terms such as **"sexting"** and **"youth-produced sexual imagery (YPSI)"** are no longer used.

"**Sextortion**" is the coercion or blackmail of a child or young person into sending nude or semi-nude images or making a payment – also known as financially motivated sexual extortion.

"**Deep fakes**" and "**deep nudes**" are terms used to describe images or videos that have been created, manipulated or altered using AI to appear genuine.

4. Upskirting

Upskirting is a criminal offence under the Voyeurism (Offences) Act 2019. It refers to the capturing of an image or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification or cause the victim humiliation, distress or alarm.

The school will not tolerate incidents of upskirting. Anyone, regardless of age or gender, can be a victim or perpetrator of upskirting.

Concerns or reports of upskirting will be reported to the DSL and handled in accordance with the school's Child Protection and Safeguarding Policy.

5. Awareness and prevention

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate, harmful or abusive.

Staff will receive appropriate training on responding to incidents involving the making or sharing of nudes and semi-nudes, including content that has been generated or altered using AI. Training will include understanding why incidents occur, assessing safeguarding risks, and knowing how and when to report concerns.

Staff will understand that creating, possessing or distributing indecent images of children is a criminal offence, regardless of whether the child depicted created or shared the image themselves. Staff will recognise, however, that where children are involved the school's response will be centred on safeguarding and promoting the welfare of the children involved.

Any concerns or reports relating to the making or sharing of nudes and semi-nudes will be reported to the DSL (or deputy DSL) immediately and managed in accordance with this policy and the Child Protection and Safeguarding Policy.

Staff members will receive training about the making or sharing of nudes and semi-nudes as part of their safeguarding and child protection training. This will address, but will not be limited to, the following:

- What the making or sharing of nudes and semi-nudes is, including AI-generated and AI-altered images
- The safeguarding and legal issues associated with making or sharing nudes and semi-nudes
- Staff responsibilities for identifying and responding to concerns
- Recognising indicators that a pupil may be involved in making or sharing nudes and semi-nudes
- Understanding the difference between age-appropriate sexual behaviour and behaviour that is inappropriate, harmful, or abusive
- How to respond to any concerns or disclosures
- [The school's response to incidents involving the making or sharing of nudes and semi-nudes

Educating pupils about the making or sharing of nudes and semi-nudes

The school adopts a whole school approach to safeguarding and will ensure pupils develop the knowledge and skills to keep themselves safe online and offline, build positive, healthy and respectful relationships, understand consent and privacy, and

recognise the risks associated with making or sharing nudes and semi-nudes, including images that have been generated or altered using AI.

Pupils will also be educated about the making or sharing of nudes and semi-nudes, including but not limited to, the following:

- What the making or sharing of nudes and semi-nudes is
- The safeguarding and legal complications
- The risks associated with AI-generated and AI-altered images
- Who they should speak to if they have concerns
- How to report concerns
- How the school will respond

Parents will also be provided with information regarding the making or sharing of nudes and semi-nudes, including AI-generated and AI-altered images and the school's response. Information will be distributed to parents at the beginning of each academic year via the school's usual communication procedure.

The school will ensure pupils understand the safeguarding, wellbeing and legal implications of making or sharing nudes and semi-nudes, including content that has been generated or altered using AI.

Pupils will be taught, and staff will be trained, to understand how AI and other digital tools can be used to generate or manipulate nude or semi-nude images without a person's knowledge or consent, and the safeguarding risks associated with this.

6. Context of safeguarding incidents

The school recognises that safeguarding incidents involving the making or sharing of nudes and semi-nudes are rarely isolated events and may occur outside the school environment. Such incidents may take place online or offline, outside school hours and away from the school premises.

Staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents and undertake an assessment of pupils' behaviour to consider whether there are wider environmental factors that are a threat to their safety and/or welfare. This may include considering peer relationships, online activity, family circumstances and the wider community.

The school will provide as much contextual information as possible when making referrals to children's social care services (CSCS) and other safeguarding partners.

7. Coordinating a response to incidents

All incidents involving the making or sharing of nudes and semi-nudes will be handled in accordance with this policy and the school's Child Protection and Safeguarding Policy.

When responding to incidents the school will be guided by the principle of proportionality. The welfare and protection of pupils will remain the primary concern throughout the school's response.

To help understand an incident, the DSL will be aware and refer to guidance and frameworks such as Brook's Sexual Behaviours Traffic Light Tool to help determine whether a child's sexual behaviour is age appropriate or may indicate abuse, exploitation or other safeguarding concerns.

The school recognises that legislation relating to indecent images of children was introduced to protect children from sexual abuse and exploitation, not to criminalise children unnecessarily. Where children are involved, the school's response will always be centred on safeguarding and promoting their welfare.

When assessing an incident, the DSL will consider whether any images have been generated, manipulated or altered using AI, as this may affect the safeguarding response and any referrals to external agencies.

Where an incident is reported, the school will:

- Ensure the concern is reported to the DSL (or deputy DSL) immediately.
- Undertake an initial review of the incident to establish the facts and assess any immediate safeguarding risks.
- Speak with the children involved, where appropriate, and only where necessary to inform safeguarding decisions.
- Inform parents as soon as practicable, unless doing so would place a child at increased risk of harm.
- Refer the matter to children's social care and/or the police where this is required to safeguard any child involved or where a criminal offence may have been committed.

8. Disclosure

All staff will recognise that incidents involving the making or sharing of nudes and semi-nudes are safeguarding concerns and will report them immediately to the DSL (or deputy DSL). Staff will receive appropriate safeguarding training to enable them to recognise, respond to and report concerns.

Staff will be made aware that a child who discloses that they have been involved in an incident involving the making or sharing of nudes and semi-nudes is likely to be embarrassed and worried about the consequences. It is likely that disclosure of their concerns within school is a last resort, and they may have already tried to resolve the issue themselves.

Staff will listen carefully, reassure the child, avoid judgement or blame, and ask only appropriate questions necessary to establish the immediate facts. Staff will not promise confidentiality and will explain that the information will need to be shared with the DSL in order to keep the child safe.

Any direct disclosure by a child or young person will be taken seriously and staff will follow the procedures as set out in the school's Child Protection and Safeguarding Policy.

The initial review meeting

During the initial review meeting, the DSL will meet with any and all relevant staff members, and aim to establish:

- Whether there is an immediate risk to the pupil or pupils involved.
- If a referral should be made to CSCS and/or the police.
- Whether it is necessary and appropriate to view the imagery, recognising that this should only occur in exceptional circumstances.
- What further information is needed to decide on the best course of action.
- Whether the imagery and/or message has been shared widely and via what services or platforms, e.g. on social media.
- Whether immediate action needs to be taken to delete or remove images and/or messages from devices or other platforms.

- If there are any relevant facts about the pupils involved that need to be considered when conducting assessment of risk.
- If any other schools, colleges, settings or individuals need to be contacted.
- How parents will be informed of and involved in the school's response.
- Whether any images have been generated, manipulated or altered using AI.

Assessment of risk

Assessing risk will be aided by considering behaviour and the motivations involved in the incident. These can be wide-ranging and move fluidly along a continuum from normal to violent and abusive behaviours. The school will always take into account that isolated inappropriate or problematic behaviour may not always be indicative of a pupil's overall sexual behaviour.

When assessing risk, the DSL will consider the circumstances of the incident, the children involved, the nature of the imagery, the motivations for its creation or sharing, any coercion or exploitation, the level of distribution and any wider safeguarding concerns.

Staff, and particularly the DSL and deputy DSL, will remain alert to the possibility that an incident involving the making or sharing of nudes and semi-nudes may not be child-on-child abuse. This may include situations where an adult is posing as a child online to obtain indecent images of children.

The DSL will make an immediate referral to CSCS and/or police if, at the initial review stage, it is determined that:

- The incident involves an adult or is suspected to involve an adult posing as another child.
- A pupil has been coerced, blackmailed, or groomed, or if there are concerns about their ability to provide consent.
- What the school knows about the incident suggests the content depicts sexual acts that are unusual for the pupil's developmental stage.
- The image involves sexual acts and the pupil in the imagery is under the age of 13.
- The image shows violence.
- The school has reason to believe that a pupil is at immediate risk of harm as a result of the image and/or message being shared.
- The incident involves AI-generated or AI-altered images and there are concerns that a child is being exploited, blackmailed, impersonated or otherwise placed at risk of harm.

Where none of the criteria above apply, the DSL, in conjunction with the headteacher, will determine the appropriate response and may choose not to involve children's social care or the police; however, if further information comes to light, the DSL may decide to escalate the incident at any stage. The rationale for the decision will be clearly recorded.

The DSL will only decide not to refer the case to CSCS and/or the police if they are confident that the risks can be managed effectively by the school. The best interests of the pupils involved, and their welfare, will be central to the DSL's decision.

When assessing risk, the DSL will seek to ascertain the answers to the following questions:

- What are the circumstances surrounding the creation or sharing of the image?
- Was it consensual or was the child coerced or put under pressure to produce it?

- Has the image been shared beyond its intended recipient?
- Was it shared without the consent of the child who produced the image?
- Has the image has been shared on social media or elsewhere online?
- What steps have been made to contain the spread?
- How old are the children involved?
- Did the child send the image to more than one person?
- Are there any concerns about the child's vulnerability?
- Are there any additional concerns if the parents are informed of the incident?
- Has AI been used to generate or alter the image?

The DSL will always use their professional judgement in conjunction with that of their colleagues when assessing incidents. When considering the information gained, they will decide whether:

- A child is at risk of harm, in which case a referral will be appropriate.
- Additional information or support is needed from other agencies.
- The school can manage the incident and support any child directly.

Where, following a risk assessment, the DSL determines that the incident can be managed safely within the school, appropriate safeguarding, pastoral support and education will be provided to the children involved. Where there are concerns about abuse, coercion, exploitation or other safeguarding risks, the incident will be managed in accordance with the Child Protection and Safeguarding Policy and, where appropriate, the Child-on-child Abuse Policy.

9. Supporting children involved in incidents

Once the school has established that a pupil is not at immediate risk of harm, the DSL will have a conversation with them to decide on the best course of action. The school recognises the importance of giving pupils an appropriate level of choice throughout the safeguarding process. Where appropriate, a pupil will be given the opportunity to speak with a different trusted member of staff if they feel more comfortable doing so. In these cases, the DSL will 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 will be to:

- Identify, without viewing wherever possible, what the image depicts, whether it has been generated or altered using AI, and whether anyone else is involved.
- Find out whether the image has been shared between two people or shared further, if known.
- Discuss what actions and support might be needed, including preventing further distribution.

During this discussion the DSL will:

- Reassure the pupil that they will be supported throughout the process and that the school will take appropriate steps to safeguard their welfare.
- Inform them that staff recognise the pressures that children can be under to take part in sharing an image and, if relevant, that support can be offered to their parents to understand the wider issues and motivations around this.

- Reassure them that they will be kept informed throughout the process.
- Remain solution-focused and avoid any victim-blaming questions such as 'why have you done this?'
- Help them understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the images.
- Discuss issues of consent and trust within healthy relationships.
- Explain the safeguarding and legal implications of making or sharing nudes and semi-nudes, including AI-generated or AI-altered images, making clear that the law is intended to protect children rather than criminalise them.
- Advise them on useful tools that can be used to report and remove images online, such as The Internet Watch Foundation (IWF) and Childline's Report Remove tool

In addition to these discussions, the DSL will also advise children on the appropriate course of action depending upon the circumstances and context of the incident, as set out below:

For children who have had their nudes or semi-nudes shared publicly, the DSL will advise them:

- To delete images or videos from social media accounts, including from cloud photo backups, if they have uploaded them themselves.
- To use the available tools to report and remove images online, as detailed above.
- How to report sexual images or videos on individual sites to get them taken down.
- To contact their mobile phone operator and have their number changed to stop others from contacting them, where appropriate.
- To speak to the school if they are concerned about any bullying behaviour.
- To report any further contact, threats, blackmail or attempts to obtain additional images to the school immediately.

For children who have been sent a nude or semi-nude, the DSL will advise them:

- 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.
- Where relevant, explain the importance of respecting boundaries, obtaining consent and never pressuring another person to create or share nude or semi-nude images.

For children who have shared another child's or young person's nudes or semi-nudes, and for children who have created a nude or semi-nude of another child and shared it, the DSL will advise them:

- The safeguarding and legal implications of creating or sharing another child's nudes and semi-nudes.
- Explain that creating or sharing digitally manipulated, AI-generated or AI-altered nude or semi-nude images of another child may have serious safeguarding and legal consequences.
- To delete images or videos from social media accounts, including from cloud photo backups.
- To use the available tools to report and remove images online, as detailed above.

- How to report sexual images or videos on individual sites to get them taken down.

10.Informing and supporting parents

The school will inform parents of an incident involving the making or sharing of nudes and semi-nudes at the earliest opportunity, unless informing them will put a child at risk of harm. Any decision not to inform the parents will be made in conjunction with other services such as CSCS and/or the police, who would take the lead in deciding when they should be informed.

The DSL will support children involved with considering the most appropriate approach for informing parents and allow them to be a part of this process if they want to be.

When working with parents, school staff will be mindful of the sensitive and emotive nature of these incidents. In all situations the school will ensure that parents are:

- Given information about incidents involving the making or sharing of nudes and semi-nudes, the school's response, and who will be their main point of contact.
- Given support to deal with their own feelings, including resources that explain the risks associated with the making or sharing of nudes and semi-nudes, including AI-generated and AI-altered images, where appropriate.
- Given support on how to speak to their child about the incident.
- Advised on the safeguarding and legal implications of making or sharing 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 1111, in house counselling services where available, or a GP. If they are concerned that their child is suicidal, they should contact 999.
- Directed to the National Crime Agency - Child Exploitation and Online Protection (NCA-CEOP) if the child discloses any further details to them that may suggest they are being groomed or sexually exploited.

In addition to these discussions, the DSL will also advise parents on the appropriate course of action depending upon the circumstances and context of the incident their child is involved with, as set out below:

For parents whose child has had their nudes or semi-nudes shared publicly, the DSL will advise them to:

- Stay calm and refrain from getting angry with their child.
- Help their child delete images or videos from social media accounts, including from cloud photo backups, if they have uploaded them themselves.
- Support their child to use the available tools to report and remove images online, as detailed above.
- Report sexual images or videos on individual sites to get them taken down.
- Contact their mobile phone operator and have their number changed to stop others from contacting them, where appropriate.
- Speak to the school if they are concerned about any bullying behaviour.

- Seek further medical advice and support if there have been similar incidents or they are worried about inappropriate sexual behaviour for their age.
- Report any further contact, threats, blackmail or attempts to obtain additional images to the school immediately.

For parents whose child has been sent nudes and semi-nudes, the DSL will advise them:

- To listen to their child's concerns without criticising their decisions.
- To help their child remove images from devices, accounts and online services where possible.
- Support their child to block, mute or report the sender where appropriate, rather than responding directly if doing so may place them at further risk.
- To report sexual images or videos on individual sites to get them taken down.
- How to discuss with their child issues of consent and trust within healthy relationships.

For parents whose child has shared another child's nudes or semi-nudes, the DSL will advise them:

- To stay calm and refrain from getting angry with their child.
- How to discuss with their child issues of consent and trust within healthy relationships.
- To contact the school and/or seek further medical advice and support if they are concerned that their child is behaving in a sexually inappropriate way, or if similar incidents have previously occurred.
- To discuss with their child the risks associated with creating, sharing or manipulating images using AI, and the importance of respecting other people's privacy and consent.

11.Multi-agency working

The school will work collaboratively with families, safeguarding partners and other relevant agencies to safeguard and promote the welfare of pupils.

In circumstances where a referral is appropriate to any external agency, such as police or CSCS, the school will follow the provisions on managing referrals and multi-agency working set out in the Child Protection and Safeguarding Policy.

The school recognises the importance of timely and effective information sharing between professionals and relevant agencies. Staff will understand that data protection legislation does not prevent the sharing of information where this is necessary to safeguard and promote the welfare of children. Any concerns about sharing information will not stand in the way of the need to safeguard children.

12.Searching devices, viewing, and deleting images

In all situations staff will be made aware of their statutory responsibilities and powers and will adhere to the provisions set out in the school's Searching, Screening and Confiscation Policy.

The school will not ask a pupil to forward, copy or transmit an image to school staff in order to report an incident.

Viewing the imagery

Staff and parents will not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so. Wherever possible, responses to incidents will be based on what the DSL has been told about the content of the imagery.

All members of staff will be made aware of what they can and cannot do in relation to viewing nudes and semi-nudes and will be expected to communicate this to any child or parent requesting that imagery be viewed.

The decision to view any image or video will be made by the DSL, exercising their professional judgement and in accordance with this policy, the Child Protection and Safeguarding Policy, and the DfE's guidance on searching, screening and confiscation. Images will only be viewed in exceptional circumstances where it is necessary to safeguard a child or determine the appropriate response.

The DSL will only make a decision to view imagery if it 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.
- 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 parent or carer in making a report.
- Unavoidable because a child has presented it directly to a staff member or nudes or images have been found on any school devices or network.
- Necessary to determine whether an image has been generated or altered using AI and this cannot be established without viewing it.

Staff will not intentionally view any imagery and will instead report it to the DSL. Where it is necessary to view the image, the DSL will first discuss the decision with the headteacher, and will:

- Not copy, print, share, store or save the imagery, as this is illegal. If this has already happened, the school will contact local police for advice and to explain the circumstances.
- Ensure viewing is undertaken by themselves or another member of the safeguarding team with permission from the headteacher.
- Ensure the viewing takes place with another member of staff in the room – usually the headteacher.
- Ensure viewing takes place on the school premises, wherever possible, and in a private space, such as the headteacher's office.
- Record the viewing of the imagery in the school's safeguarding records, including the following information:
  - Who was present
  - Why the image was viewed
  - Any actions taken as a result of the image being viewed
  - Ensure these records are signed and dated by the staff members present
- Confiscate any devices, where appropriate, and take the following actions:
  - Disconnect the device from Wi-fi and data
  - Turn the device off
  - Place the device in a secure place
  - Pass the device on to police, where necessary.

The school is aware that viewing indecent imagery can be distressing for everyone involved. If indecent images have been viewed by a member of staff in the course of their duties, the school will ensure that the staff member is provided with the appropriate emotional support.

Deletion of imagery

If a decision has been made not to make a referral to the police and/or CSCS the school will take the lead in resolving the incident and deleting any nudes and semi-nudes from devices and online services, where this is appropriate and safe to do so.

Decisions to delete images and not make a report to the police and/or CSCS will be recorded and justified.

The school will also take the following actions:

- Explain the legal and safeguarding implications of retaining or sharing nudes and semi-nudes.
- Ask them to delete the imagery and to confirm that they have deleted it
- Give them a deadline for deletion across all devices, online storage, or social media sites
- Explain that failing to delete the imagery may increase safeguarding concerns and, where appropriate, could result in police involvement.
- Record all decisions, including times, dates and reasons for decisions made and log these in the safeguarding records
- Inform parents about the incident and actions being taken, unless this presents a further risk to any child
- Where AI-generated or AI-altered images are involved, support the pupil to report and remove the content using appropriate reporting mechanisms where possible.

13.Monitoring and review

This policy will be updated as needed to ensure it is up to date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff, parents and pupils. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.