



POLICY FOR INCIDENTS OF THE SHARING OF NUDE/SEMI NUDE IMAGES

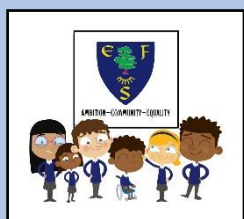
THIS DOCUMENT IS a statement of the aims, principles and procedures for online safety at Elms Farm Primary School.

IT WAS DEVELOPED in Summer

IT WAS APPROVED by the governing body in September 2026

REVIEWED:

Our School Values



Ambition: We are ambitious for every child to achieve their best and be ambitious about their learning and their future.

Community: We value everyone in our community and learn how to look after each other and our environment. We respect each other and work together.

Equality: We value each other, our beliefs and differences are celebrated. Everyone is treated equally and fairly.



We are a Rights Respecting School



This policy links to the UN Convention for the right of the child:



1. STATEMENT OF INTENT

Elms Farm Primary School 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.



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2. LEGAL FRAMEWORK

2.1 This policy has due regard to all relevant legislation and 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

2.2 This policy operates in conjunction with the following school policies:

- Child Protection and Safeguarding Policy
- Anti-bullying Policy
- Records Management Policy
- Complaints Procedures Policy
- Child-on-child Abuse Policy
- Behaviour Policy
- Social Media Policy
- Staff Code of Conduct
- Online Safety Policy
- Data Protection Policy
- Searching, Screening and Confiscation Policy
- AI Policy

3. ROLES AND RESPONSIBILITIES

3.1 Governors

The governing board will be 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



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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.

3.2 Headteacher

The headteacher will be 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.
- Reviewing this policy at least annually.
- 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.

3.3 DSL

The DSL will be 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.



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- 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.

3.4 The SENDCo

The SENDCo will be 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.

3.5 All staff members

All staff members will be 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.



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- 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.

4. DEFINITIONS

4.1 "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.

4.2 "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.

4.3 "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.

4.4 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

4.5 "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.



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4.6 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.

4.7 "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.

4.8 "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.

5. UPSKIRTING

5.1 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.

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

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

6. AWARENESS AND PREVENTION

6.1 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.

6.2 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.

6.3 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



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involved the school's response will be centred on safeguarding and promoting the welfare of the children involved.

6.4 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.

6.5 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: included in appendix A

7. EDUCATING PUPILS



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7.1 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.

7.2 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 letter.

7.3 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.

8. CONTEXT OF SAFEGUARDING INCIDENTS

8.1 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.

8.2 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.

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

9. COORDINATING A RESPONSE TO INCIDENTS

9.1 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.

9.2 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.



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9.3 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.

9.4 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.

9.5 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.

9.6 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.

APPENDIX 1: ELMS FARM PRIMARY SCHOOL

Procedure: Disclosure of the Sharing of Nudes, Semi-Nudes and AI-Generated Images

1. Immediate Response: Any member of staff who becomes aware of an incident should:

- Remain calm and reassure the child.
- Treat the matter as a safeguarding concern.
- Report immediately to the DSL or Deputy DSL.
- Not promise confidentiality.
- Record the concern factually using the school's safeguarding recording system.
- Not view, copy, print, share, save or forward images unless advised by the DSL and absolutely necessary for safeguarding purposes.

2. DSL Initial Assessment

The DSL should:

- Establish what has happened.
- Identify who is involved.



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- Determine whether the image is:
- Self-generated.
- Shared consensually.
- Shared non-consensually.
- AI-generated, manipulated, "deepfake" or "deep nude".
- Assess immediate risk of harm.
- Consider child-on-child abuse, coercion, exploitation, bullying, harassment or criminal behaviour.
- Determine whether other children may be affected.

3. Safeguarding Risk Assessment

The DSL should consider:

- Age and developmental stage.
- Any evidence of coercion, threats, blackmail or grooming.
- SEND vulnerabilities.
- Emotional wellbeing and mental health.
- Whether the image has been widely shared.
- Risk of ongoing harassment.
- Family context and existing safeguarding concerns.
- Whether the incident forms part of harmful sexual behaviour (HSB).

4. Manage the Image: Staff should not request children to forward images.

If an image is discovered on a school device:

- Secure the device.
- Do not copy or distribute the image.
- Follow DfE guidance on searching, screening and confiscation.
- Seek advice from police or children's social care where appropriate.

5. Inform Parents/Carers

- Parents/carers should be informed promptly.
- The rationale for any decision not to inform parents should be clearly recorded.
- DSLs should consider whether informing parents could place a child at further risk.



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6. Consider External Referrals

The DSL should consider: Children's Social Care

Where there are concerns regarding:

- Exploitation.
- Coercion.
- Significant emotional harm.
- Vulnerability.
- Ongoing abuse.

Police: Where there is evidence of:

- Coercion or blackmail.
- Distribution of images.
- Adult involvement.
- Criminal exploitation.
- Serious harmful sexual behaviour.

AI-generated nude imagery created to humiliate, harass or exploit a child.

7. Support the Children Involved

Support should be provided to:

- The victim
- Emotional support.
- Safety planning.
- Monitoring wellbeing.
- Protection from further contact or retaliation.
- The child responsible
- Safeguarding assessment.
- Education about online safety and consent.



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- Proportionate behavioural response.
- Consideration of unmet safeguarding needs.

8. AI-Generated Images

Schools should treat AI-generated nude or semi-nude imagery involving children in exactly the same way as real imagery. This includes:

- Deepfakes.
- "Nudification" apps.
- Images created without any original photograph.
- Images digitally altered from existing photos.

9. Recording

The DSL should record:

- Nature of the concern.
- Who was involved.
- Assessment undertaken.
- Advice sought.
- Decisions made.
- Actions taken.
- Support provided.
- Outcomes and review arrangements.