

Three Counties Academy Trust



Sharing Nudes and Semi-Nudes Policy

#SG44

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Policy lifespan: 3 years. Subject to annual compliance check. Next full review 6th September 2029.

Version history

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Policy Abbreviations and Acronyms

AI	Artificial Intelligence
CSCS	Children's Social Care Services
DBS	Disclosure and Barring Service
DfE	Department for Education
DSL	Designated Safeguarding Lead
IWF	Internet Watch Foundation
KCSIE	Keeping Children Safe in Education
SEND	Special Educational Needs and Disabilities
SENCO	Special Educational Needs Coordinator
TCAT	Three Counties Academy Trust
UKCIS	UK Council for Internet Security
UK GDPR	UK General Data Protection Regulation

NB. Where the term “parent” or “parents” is used this includes those who act as carers or have parental responsibility.

NB. Staff roles noted within this policy may also include those staff performing that role in an ‘Acting’ capacity.

Statement of intent

Three Counties Academy Trust (TCAT) and our schools are committed to safeguarding and promoting the welfare of all pupils. We recognise that incidents involving the creation, possession or sharing of nudes and semi-nudes, whether captured using a camera, generated or manipulated through artificial intelligence (AI), or shared through online platforms and digital devices, present significant safeguarding, wellbeing, privacy and legal concerns for those involved.

TCAT recognises that such incidents can arise for a variety of reasons, including peer pressure, coercion, exploitation, bullying, abuse, harmful online influences, poor decision-making or a lack of understanding of the risks and consequences associated with sharing images. We also recognise that children involved may be victims, perpetrators, or both, and that responses must be child-centred, proportionate and focused on safeguarding rather than criminalisation wherever appropriate.

TCAT and our schools take a proactive and preventative approach to reducing the risks associated with the creation and sharing of nudes and semi-nudes. Through our curriculum, pastoral support systems, safeguarding arrangements and online safety education, we promote respectful relationships, digital responsibility, consent, healthy behaviours and informed decision-making in age-appropriate ways.

This policy provides a clear and consistent framework for preventing, identifying, managing and responding to concerns involving nudes and semi-nudes. It sets out the responsibilities of the Trust Board, Local Governing Bodies, school leaders, the Designated Safeguarding Lead (DSL) and all staff in ensuring that incidents are managed lawfully, sensitively and in accordance with current safeguarding guidance. The welfare, dignity, safety and rights of the children involved will remain central to all decision-making.

Whilst this policy is named as “Sharing Nudes and Semi-Nudes”, it covers both the making of such images and the sharing of those or other such images.

TCAT is committed to working in partnership with pupils, parents, carers, external agencies and partner organisations where appropriate to ensure that concerns are addressed effectively, victims are supported, risks are reduced and lessons are learned to help prevent future incidents.

Member, Trustee, Local Governor and Staff Summary

Purpose of the Policy

- Establishes a clear Trust-wide framework for preventing, identifying and responding to incidents involving the making, possession or sharing of nude or semi-nude images involving children under 18 years of age
- Applies to incidents involving photographs, videos, livestreams and images that have been generated, manipulated or altered using artificial intelligence (AI) technology
- Ensures all responses are child-centred, proportionate and focused on safeguarding and welfare rather than criminalisation wherever possible
- Supports schools in protecting children from harm, exploitation, coercion, bullying, abuse and other safeguarding risks associated with image sharing

Governance and Strategic Assurance

- Members, Trustees and Local Governors should seek assurance that effective safeguarding arrangements are in place to manage incidents involving nudes and semi-nudes
- The Trust Board and Local Governing Bodies are responsible for monitoring the effectiveness of the policy and ensuring safeguarding remains at the centre of decision-making processes
- Governance arrangements should provide confidence that appropriate reporting systems, escalation routes, filtering and monitoring systems and safeguarding procedures are operating effectively across schools
- Leaders should ensure appropriate resources, training and support are available to manage incidents appropriately and consistently

Understanding the Safeguarding Context

- Incidents involving nude or semi-nude imagery are rarely isolated and may be indicators of wider safeguarding concerns including abuse, exploitation, coercion, grooming, peer-on-peer abuse or online harm
- Children involved may be victims, perpetrators, or in some cases both, requiring careful and balanced safeguarding responses
- Schools must consider wider contextual factors such as peer relationships, online activity, family circumstances and community influences when assessing risk

- AI-generated and AI-altered imagery presents emerging safeguarding risks that require specific consideration within assessments and responses

Responsibilities of School Leaders

- Ensure staff receive appropriate safeguarding training relating to incidents involving the making or sharing of nudes and semi-nudes
- Promote a safeguarding culture in which concerns are recognised, reported and addressed promptly
- Ensure parents receive appropriate information and support regarding online safety risks and the school's safeguarding response framework
- Support Designated Safeguarding Leads (DSLs) in decision-making, risk assessment and referrals where necessary
- Ensure relevant safeguarding policies remain aligned and implemented effectively across the school

Key Responsibilities of the DSL

- Lead the school's response to reported incidents and coordinate initial safeguarding reviews
- Assess immediate risk, determine safeguarding needs and coordinate referrals to social care or police where necessary
- Decide whether imagery needs to be viewed and ensure any such decision follows strict safeguarding guidance and legal requirements
- Ensure all children involved receive appropriate safeguarding, educational and pastoral support
- Maintain accurate records and ensure decisions are properly documented and justified
- Consider whether AI-generated or AI-altered content is a factor within an incident and ensure appropriate safeguarding action is taken

Critical Staff Responsibilities

- Always treat incidents involving nude or semi-nude imagery as safeguarding concerns
- Report concerns immediately to the DSL or Deputy DSL without delay
- Remain alert to indicators of abuse, exploitation, coercion, sextortion, online harm and child-on-child abuse
- Safeguard the wellbeing of all pupils and act in their best interests at all times
- Maintain appropriate confidentiality whilst recognising safeguarding information must be shared appropriately to protect children
- Promote respectful relationships, privacy, consent and responsible online behaviour through daily interactions and curriculum delivery
- Avoid victim-blaming language or attitudes and ensure pupils feel listened to, understood and supported

What Staff Must Not Do

- Staff must not ignore reports or disclosures relating to nude or semi-nude imagery
- Staff must not investigate incidents independently without involving the DSL
- Staff must not intentionally view, copy, save, print, share or distribute imagery themselves
- Staff must not promise confidentiality to pupils when safeguarding concerns have been raised
- Staff must not ask pupils to forward or send images to them in order to report a concern

Responding to Concerns

- Schools follow a structured process involving initial review, risk assessment, safeguarding decision-making and support planning
- Responses are guided by proportionality, child welfare and safeguarding need rather than automatic criminal sanctions
- Consideration is given to coercion, blackmail, age, vulnerability, distribution of images, exploitation risks and potential harm
- Parents will usually be informed and involved unless this may increase risk to a child

Supporting Children

- Children involved in incidents should receive ongoing safeguarding, emotional and pastoral support
- Schools should help pupils understand privacy, consent, respectful relationships and the consequences of image sharing
- Support should focus on reducing future risk, addressing underlying vulnerabilities and promoting positive choices moving forward

Multi-Agency Working

- Schools work closely with parents, children's social care, police and other safeguarding partners where required
- Information sharing should support safeguarding outcomes and should not be hindered by unnecessary concerns about data protection when a child's welfare is at risk

Parent Summary

Our Commitment to Keeping Children Safe

- TCAT schools take all incidents involving the making or sharing of nude or semi-nude images seriously because they can have significant impacts on a child's safety, wellbeing, privacy and mental health
- Concerns may involve images shared through phones, social media, messaging services, gaming platforms or content generated or altered using artificial intelligence (AI)
- Our approach is safeguarding-focused and centred on protecting children rather than blaming or criminalising them wherever possible

Helping Children Make Safe Choices

- Pupils are taught about consent, privacy, respectful relationships and responsible online behaviour through age-appropriate safeguarding education
- Children learn about the risks associated with sharing images and the potential impact on themselves and others
- Education includes understanding how AI technology can be used to create or manipulate images without a person's knowledge or consent

If an Incident Happens

- Any concern will be treated as a safeguarding matter and passed immediately to the Designated Safeguarding Lead (DSL)
- The school will assess the circumstances carefully, consider any immediate risks and determine what support is needed
- Staff will listen to children calmly, sensitively and without judgement
- The welfare and safety of children will remain the school's primary consideration throughout the process

Support for Children Involved

- Children who have created, received or shared images will be supported appropriately according to their individual circumstances
- TCAT recognises that children may be victims, perpetrators, or both, and responses will reflect this complexity

- Support may include safeguarding intervention, pastoral care, education around relationships and online safety, and referrals to specialist services where required

Working with Parents and Carers

- Parents will normally be informed and involved as soon as it is safe and appropriate to do so
- The school will explain concerns, discuss support arrangements and work in partnership with families to safeguard children
- In rare circumstances, parents may not be informed immediately if this could increase the risk of harm to a child

Understanding the Risks

- Sharing images can lead to embarrassment, bullying, exploitation, blackmail, coercion and significant emotional distress
- Images may be shared beyond their intended recipient and can be difficult to remove once distributed online
- AI-generated or AI-altered images can also be used to harm, exploit or impersonate children and are treated seriously by the school

When External Agencies May Become Involved

- The school may seek support from social care, police or other safeguarding agencies where a child is at risk of harm
- Referrals may be necessary where there are concerns about exploitation, grooming, coercion, violence, blackmail or adult involvement
- Schools work closely with safeguarding partners to protect children and reduce future risk

Reassurance for Parents

- TCAT schools are committed to supporting children through difficult situations with dignity, sensitivity and respect
- The aim is always to protect children, stop further harm and help them learn from incidents in a safe and supportive environment
- Parents can be confident that concerns will be managed carefully and in line with current safeguarding guidance and legislation

Pupil Summary

Why This Policy Exists

- Everyone has the right to feel safe, respected and protected both in school and online
- The policy explains how the school helps protect pupils from harm linked to the creation, sharing or possession of nude or semi-nude images and videos
- This includes images shared through phones, social media, messaging apps, gaming platforms and content created or changed using artificial intelligence (AI)
- The school's priority is always to keep pupils safe and provide appropriate support when concerns arise

Understanding the Risks

- Once an image has been shared, it can be very difficult to control who sees it or where it ends up
- Sharing images can sometimes lead to embarrassment, bullying, exploitation, blackmail, threats or emotional distress
- Some children may feel pressured, tricked or manipulated into creating or sharing images they do not want to share
- AI technology can now be used to create fake images that appear real, which can also cause harm and be treated as a safeguarding concern

Respect, Privacy and Consent

- Everyone deserves to have their privacy respected
- Never pressure, persuade or encourage someone to send an image of themselves
- Never share someone else's image without their knowledge or permission
- Healthy friendships and relationships are based on trust, respect and consent

If Something Happens

- If you receive an image that worries you, do not share it with anyone else
- If you have shared an image or are worried about an image being shared, tell a trusted adult as soon as possible

- You can speak to a teacher, tutor, pastoral leader, safeguarding lead or any trusted member of staff
- Asking for help early can prevent a situation becoming more serious

How School Will Help

- Staff will listen to you carefully and take your concerns seriously
- You will be treated respectfully and fairly without judgement or blame
- The school will look at how best to keep you safe and stop any further harm occurring
- Support may be provided through safeguarding staff, pastoral support and, where needed, specialist agencies

What Staff Will Do

- Staff must report concerns to the Designated Safeguarding Lead (DSL) so that support and protection can be put in place quickly
- Staff will not ignore concerns involving images, online behaviour, blackmail, threats or exploitation
- Decisions will be made based on what is safest and best for the children involved

Important Messages

- You are never alone if something goes wrong online
- Getting help is always the right thing to do
- The school's aim is to keep children safe, reduce harm and help pupils move forward positively from difficult situations
- Respect yourself, respect others and think carefully before sharing anything online

1. Legal framework

This policy has due regard to all relevant legislation 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](#)

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies:

- Behaviour Policy
- Safe Use of AI Policy (CU14)
- Records Management Policy (FI2)
- Data Protection Policy (FI20)
- Complaints Policy and Procedures (GN9)

- Staff Code of Conduct (HR26)
- Child Protection and Safeguarding Policy and Procedure (SG1)
- Child-on-Child Abuse Policy (SG10)
- Anti-Bullying Policy (SG19)
- Social Media Policy (SG24)
- Searching, Screening and Confiscation Policy (SG25)
- Online Safety Policy (SG43)

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website.

2. Roles and responsibilities

The Trust Board and where delegated, Local Governing Bodies are responsible for:

- Monitoring the effectiveness of the procedures set out in this policy and its implementation across TCAT schools
- 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 each 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 each school's approach to preventing incidents involving the making or sharing of nudes and semi-nudes

The CEO is responsible for:

- Safeguarding pupils' wellbeing across TCAT
- Ensuring Executive Headteachers, Headteachers and Heads of School have effectively implemented this policy
- 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

- Reviewing this policy in line with the published schedule

Executive Headteachers, Headteachers and where delegated Heads of School are responsible for:

- Safeguarding their pupils' wellbeing
- Ensuring their staff receive appropriate safeguarding training on responding to incidents involving the making or sharing of nudes and semi-nudes
- Providing their 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 their 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 their 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 Procedures, and at least Part one of KCSIE

SENCOs are responsible for:

- Liaising with their DSL, Headteacher/Head of School, 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

DSLs are 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 TCAT's Child Protection and Safeguarding Policy and Procedures
- 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 their Headteacher/Head of School

- 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 and Procedures
- Conducting interviews with pupils involved in incidents, with relevant staff members
- Recording details of incidents in line with TCAT's 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 TCAT's Child Protection and Safeguarding Policy and Procedures
- Leading on the training of their staff on safeguarding issues, including those for this policy

Staff are responsible for:

- Ensuring their pupils are fully informed and are aware of suitable support systems regarding the making or sharing of nudes and semi-nudes
- Safeguarding their pupils' wellbeing in relation to the making or sharing of nudes and semi-nudes
- Providing a safe environment in which all 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

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.

TCAT 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 appropriate DSL and handled in accordance with TCAT’s Child Protection and Safeguarding Policy and Procedures.

5. Awareness and prevention

In consultation with Executive Headteachers, Headteachers and Heads of School, DSLs will be responsible for ensuring regular and appropriate safeguarding training within their school.

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 school’s DSL (or deputy DSL) immediately and managed in accordance with this policy and the Child Protection and Safeguarding Policy and Procedures.

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
- Their 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

TCAT schools adopt a whole school, age-appropriate 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 their 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.

Each TCAT 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

TCAT schools recognise 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 DSLs 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.

Our schools 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

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

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

To help understand an incident, DSLs 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.

TCAT and our schools recognise 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, our response will always be centred on safeguarding and promoting their welfare.

When assessing an incident, DSLs 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. Supporting children involved in incidents

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 their 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 TCAT's Child Protection and Safeguarding Policy and Procedures.

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 DSLs and deputy DSLs, 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 their Headteacher/Head of School, 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 TCAT's Child Protection and Safeguarding Policy and Procedures and, where appropriate, our Child-on-Child Abuse Policy.

9. Informing and supporting parents

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. TCAT 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. Multi-Agency working

TCAT and our schools 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, our schools will follow the provisions on managing referrals and multi-agency working set out in the Child Protection and Safeguarding Policy and Procedures.

TCAT 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.

11. 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 TCAT'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, TCAT's Child Protection and Safeguarding Policy and Procedures, 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 their DSL. Where it is necessary to view the image, the DSL will first discuss the decision with their Headteacher/Head of School or TCAT's Education Welfare and Safeguarding Support Officer, 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/Head of School
- Ensure the viewing takes place with another member of staff in the room – usually the Headteacher/Head of School
- Ensure viewing takes place on the school premises, wherever possible, and in a private space, such as the Headteacher's/Head of School'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

TCAT and our schools are 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, TCAT and 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

Monitoring and review

Lifespan of Policy: 3 Years

At any point this policy is updated or fully reviewed, it will be updated on the main TCAT website and will automatically update on all TCAT school websites simultaneously.

Where an annual check or other check results in minor changes, the Version History will be reviewed and updated with a change in the number following the decimal point, for example, v1.1 ⇒ v1.2. Where the policy is reviewed in full, then the number before the decimal point will change and reset, for example v1.4 ⇒ v2.0.

Any changes made by the CEO in collaboration with the Board Appointed Trustee will be passed to the Trust Board for ratification and subsequently be notified to Clerks to Local Governing Bodies and Headteachers/Heads of School.

The next scheduled full review date for this policy is 6th September 2029.

Date approved by the Board Appointed Trustee: 7th September 2026.

To be ratified and recorded in the minutes at the first Trust Board Meeting after 7th September 2026.

Trust Glossary

AA	Admissions Authority	H&S	Health and Safety
AAI	Adrenaline Auto-Injector (Epi Pen)	HoS	Head of School
ACM	Asbestos Containing Materials	HSE	Health and Safety Executive
AHT	Assistant Headteacher	ICO	Information Commissioners Office
AIR	Attendance Intervention Reviews	IDSR	Inspection Data Summary Report
APDR	Assess Plan Do Review Cycle	IHP	Individual Healthcare Plan
APIs	Application Programming Interfaces	IRMS	Information and Records Management Society
ASC	Autistic Spectrum Condition	IWF	Internet Watch Foundation
ASP	Analyse School Performance	KCSIE	Keeping Children Safe in Education
ATH	Academy Trust Handbook	KS1/2/3/4	Key Stage 1/2/3/4
BAME	Black, Asian and Minority Ethnic Backgrounds	LAC	Looked After Child
BAT	Board Appointed Trustee	LADO	Local Authority Designated Officer
BCP	Business Continuity Plan	LGB	Local Governing Body
BFR	Budget Forecast Return	LLC	Low-Level Concerns
CEO	Chief Executive Officer	LSA	Learning Support Assistants
CFO	Chief Financial Officer	MASH	Multi-Agency Safeguarding Hub
CIF	Condition Improvement Fund	MAT	Multi-Academy Trust

CIN	Child in Need	MFA	Multi-Factor Authentication
CLA	Children Looked After	MFL	Modern Foreign Language
CMIE	Child Missing in Education	NCSC	National Cyber Security Centre
COO	Chief Operating Officer	NoV	Note of Visit
COSHH	Control of Substances Hazardous to Health	NPQ	National Professional Qualifications
CP	Child Protection	PA	Persistent Absence
CPD	Continuing Professional Development	PAN	Published Admission Number
CPOMS	Child Protection Online Management System	PECR	Privacy and Electronic Communications Regulations
CSCS	Children's Social Care Services	PEP	Personal Education Plan
CSE	Child Sexual Exploitation	PEEP	Personal Emergency Evacuation Plan
CTIRU	Counter-Terrorism Internet Referral Unit	PEx	Permanent Exclusion
CWD	Children with Disabilities	PP	Pupil Premium
CYPMHS	Children and Young People's Mental Health Services	PPG	Pupil Premium Grant
DBS	Disclosure and Barring Service	PSHE	Personal, Social and Health Education
DDSL	Deputy Designated Safeguarding Lead	PSED	Public Sector Equality Duty
DfE	Department for Education	PTFA	Parent, Teacher and Friends Association
DHT	Deputy Headteacher	QA	Quality Assurance

DSE	Display Screen Equipment	RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
DSL	Designated Safeguarding Lead	RHE	Relationships and Health Education
DPO	Data Protection Officer	RPA	Risk Protection Arrangement
EAL	English as an Additional Language	RSHE	Relationships, Sex and Health Education
ECT	Early Career Teacher	SA	Severely Absent
EDIB	Equality, Diversity, Inclusion and Belonging	SALT	Speech and Language Therapist
EHA	Early Help Assessment	SARC	Sexual Assault Referral Centre
EHENA	Education, Health and Care Needs Assessment	SBM	School Business Manager
EHCP	Education, Health and Care Plan	SCC	Standard Contractual Clause
EHE	Elective Home Education	SCITT	School-Centred Initial Teacher Training
ELSA	Emotional Literacy Support Assistant	SCR	Single Central Record
ESFA	Education and Skills Funding Agency	SDP	School Development Plan
EVC	Educational Visit Coordinator	SDQ	Strengths and Difficulties Questionnaire
EWOSSE	Education Welfare and Safeguarding Support Officer	SEF	Self-Evaluation Form
EYFS	Early Years Foundation Stage	SEMH	Social, Emotional, and Mental Health
FBV	Fundamental British Values	SENCO	Special Educational Needs Coordinator
FFT	Fischer Family Trust	SEND	Special Educational Needs and Disabilities

FGM	Female Genital Mutilation	SIP	School Improvement Partner
FGMPO	FGM Protection Order	SLA	Service Level Agreement
FOI	Freedom of Information	SLCN	Speech, Language and Communication Needs
FSM	Free School Meals	SLT	Senior Leadership Team
FTS	Find a Tender Service	SPOC	Single Point of Contact
GAG	General Annual Grant	STEM	Science, Technology, Engineering and Maths
GDPR	General Data Protection Regulation	TA	Teaching Assistant
GIAS	Get Information about Schools	TAC	Team Around the Child
HASH	Herefordshire Association of Secondary Heads	TCAT	Three Counties Academy Trust
HBA	Honour Based Abuse	TUPE	Transfer of Undertakings (Protection of Employment)
HR	Human Resources	VSH	Virtual School Headteacher