

St. Anne's Catholic Primary School

Youth-produced Sexual Imagery (YPSI) Policy



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September
2024

Signed by:

_____ Headteacher

Date: _____

_____ Chair of governors

Date: _____

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Statement of intent

St Anne's Catholic Primary School is committed to safeguarding and supporting all pupils and staff both inside and outside of school against all the facets and complex issues surrounding youth-produced sexual imagery (YPSI). This approach will be informed by a whole-school safeguarding strategy, and will always focus on ensuring the mental and physical wellbeing of pupils and staff members.

This good practice policy provides a clear and consistent framework for the DSL and the headteacher in delivering this promise, as well as ensuring members of the governing board, headteachers, and staff understand their responsibilities under safeguarding legislation. It aims to assist the school in ensuring policies and procedures regarding YPSI are clear and easily understood by staff, pupils, and parents. It aims to also provide the school with a foundation for teaching pupils what behaviour is acceptable and unacceptable.

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 (2024) '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 (2024) 'Sharing nudes and semi-nudes: how to respond to an incident (overview)'
- DfE (2024) 'Keeping children safe in education 2024'
- Ministry of Justice (2015) 'Revenge Porn'
- Data Protection Act 2018
- 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

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

2. Roles and responsibilities

The headteacher is responsible for:

- Safeguarding pupils' wellbeing.
- Overseeing staff training on YPSI with the DSL.
- Reviewing this policy at least annually.
- Providing parents with suitable information and support on YPSI.
- Liaising with the DSL on any incidents involving YPSI 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 parts one, two, and five of 'Keeping children safe in education'.

The governing 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 handling incidents of YPSI; 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 of YPSI.
- 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.

Staff are responsible for:

- Ensuring pupils are fully informed and are aware of suitable support systems regarding YPSI.
- Safeguarding pupils' wellbeing in relation to YPSI.
- Providing a safe environment in which pupils can learn.
- Being aware of the indicators 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 any safeguarding concerns to the DSL.
- Adhering to the procedures set out in this policy.
- Promoting dialogue and understanding, and ensuring all pupils feel listened to and understood.
- Empowering pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- 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 an incident of YPSI involving SEND pupils.
- Considering and enacting the appropriate arrangements for SEND pupils involved in YPSI incidents.

The DSL is responsible for:

- Initiating and managing initial responses to incidents involving YPSI, in conjunction with relevant staff members, and in relation to the Child Protection and Safeguarding Policy.
- Initiating and managing responses to incidents of upskirting with relevant staff members and in line with 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 of YPSI in conjunction with the headteacher.
- Handling the viewing of any YPSI, when it is necessary to do so, in conjunction with the headteacher.
- Conducting interviews with pupils involved in YPSI incidents, with relevant staff members.
- Recording details of YPSI incidents in line with the Records Management Policy.
- Supporting affected pupils and providing information about the seriousness of the issue and the law surrounding YPSI.

3. Definitions

“Youth-produced sexual imagery” is defined as the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline.

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

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

“Indecent imagery” is the term for making, possessing, and distributing any imagery of someone under 18 which is ‘indecent’, and is illegal. This includes imagery of yourself if you are under 18. The term “Child Sexual Abuse Material” (CSAM) can also be used to describe indecent images of children. ‘Indecent’ is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or district judge to decide based on what is the recognised standard of propriety.

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

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

“Pseudo-images” are computer-manipulated and/or -generated images that otherwise appear to be a photograph or video. This includes images and videos that are generated by AI.

“Image-based sexual abuse” refers to the non-consensual sharing of nudes and semi-nudes.

“Sexting” is the wording used by many adults to encompass the broad array of YPSI, however many young people interpret ‘sexting’ as writing and sending explicit messages with another, rather than images or videos.

“**Revenge porn**” is the creating and sharing of nude or semi-nude photos or videos of another person without their consent and with the intention of causing distress or embarrassment. It is a criminal offence under the Criminal Justice and Courts Act 2015.

“**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 and videos that have been digitally manipulated or AI-generated to look like real images and videos.

4. Upskirting

Upskirting is an offence. Under the Voyeurism (Offences) Act 2019, “**upskirting**” 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 has a zero-tolerance stance on upskirting incidents. Despite the name, anyone, including pupils and staff, of any gender, can be a victim of upskirting.

Any incidents of upskirting will be reported to the DSL and handled in accordance with the school’s Child Protection and Safeguarding Policy.

5. Awareness of YPSI

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 and harmful.

Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted. Similarly, the school understands that the sharing of an image of a child – even if it has been shared with consent – is a criminal offence.

The school will ensure that staff treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos as a safeguarding concern. Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible.

Staff members will receive training about YPSI on an annual basis which will address, but is not limited to, the following:

- What YPSI is and how young people engage in it
- The legalities surrounding YPSI
- School staff’s responsibility to be aware of YPSI
- How to recognise instances of YPSI

- How to understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful
- How to respond to any concerns or disclosures of YPSI
- The school's response to instances of YPSI

Educating children on the sharing of sexual images

The school adopts a whole school approach to safeguarding and will ensure that children are given the skills and knowledge to keep themselves safe and develop positive, healthy and respectful relationships. Children will be taught in PSHE , RSHE and computing lessons that the sharing and viewing of indecent images of children, including those created by children, is a criminal offence. They will also be taught to understand and recognise healthy and unhealthy behaviours and what is normal or acceptable behaviour.

Pupils will also be educated about YPSI, including but not limited to, the following:

- What YPSI is and how young people engage in it
- The legalities surrounding YPSI
- Who they should speak to if they have concerns
- How to report explicit images and messages
- The school's response to YPSI

Parents will also be provided with information on an annual basis regarding YPSI and the school's response. Information will be distributed to parents at the beginning of each academic year via letter.

The school will ensure pupils, when at an age and stage appropriate level, are informed about the laws surrounding YPSI and that these laws include the creation and sharing of digitally manipulated and AI-generated images and videos.

6. Context of safeguarding incidents

The school is aware that safeguarding incidents can occur outside of school and can be associated with outside factors. Given the nature of incidents involving the sharing of YPSI, it is highly likely that the incident has occurred outside of the school day, and off 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.

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

7. Coordinating a response to incidents of YPSI

All incidents of YPSI will be handled in accordance with the school's Child Protection and Safeguarding Policy.

When responding to incidents the school will be guided by the principle of proportionality, with the primary concern at all times being the welfare and protection of any children involved.

To help understand an incident, the DSL will be aware and refer to guidance and frameworks such as St Helens Safeguarding Partnership's Erase Tool, to help identify when a child or young person's sexual behaviour is a cause for concern in relation to their development.

The school understands that the law surrounding the creation and sharing of the indecent imagery of children was intended to criminalise adults seeking to sexually abuse children, and not to criminalise the children themselves.

Where a YPSI incident occurs, the school will initiate the following response:

- The incident will be referred to the DSL immediately
- The DSL will hold an initial review meeting with the necessary school staff
- The DSL, and other relevant staff members if appropriate, will conduct interviews with all pupils involved
- Parents of the pupils involved will be informed as soon as possible and involved in the school's response, unless doing so would put a pupil at further risk of harm
- Where a pupil has been physically harmed, or is at risk of physical harm, the incident will be referred to children's social care and/or the police without delay

Disclosure

All staff have a duty to recognise and refer any incidents involving YPSI and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

Staff will be made aware that a child who discloses that they are the subject of an incident of YPSI 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.

When a disclosure is made, staff will ensure the child is feeling comfortable and that appropriate and sensitive questions are asked, in order to minimise further distress or trauma to them.

Any direct disclosure by a child or young person will be taken seriously and staff will follow the procedures as set out in the schools 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 for the DSL to view the imagery and/or message.
- 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.

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.

The school will use the DfE guidance to define and assess incidents according to individual motivations. Incidents may be described as:

- **Aggravated** – incidents involving abusive elements beyond the creation, sharing or possession of YPSI, or involving adult criminal behaviour. These can further be sub-categorised into:
 - **Adult involved:** involving sexually and/or financially motivated incidents.
 - **Youth only – intent to harm:** arising from inter-personal conflict.
 - **Youth only – reckless misuse:** pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.
- **Experimental** – incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be subcategorised into:
 - **Romantic:** whereby young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair.
 - **Sexual attention seeking:** it is important to note that incidents within this category can be a part of normal childhood. A young person should not be blamed for taking and sharing their image.
 - **Other:** cases that do not appear to have aggravating elements, but also do not fit into the Romantic or Attention Seeking sub-types, such as for a young person's self-use, or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

Staff, and particularly the DSL and deputy DSL, will be vigilant for YPSI incidents that may at first appear to be child-on-child abuse, e.g. where an adult is pretending to be a child online in order to obtain indecent images.

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.

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 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:

- Why was the image shared
- 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

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.

If a pupil has shared an image and/or message consensually, and there is no intended malice, the school will resolve the incident directly, without involvement from other stakeholders. If a pupil has shared an image, message or video as a result of interpersonal conflict such as break-ups or fights, the incident will be managed in line with the school's Child-on-child Abuse Policy.

8. Supporting children involved in incidents

Once the school have assessed that a child is not at immediate risk, the DSL will have a conversation with them to decide on the best course of action. The school is aware that it is important for the child to be given a sense of control over the reporting process and, where possible, will be given the option of speaking with a different 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 contains and whether anyone else has been 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 them that they are not alone, and that the school will do everything they can to help and support them.
- 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 law on the sharing of indecent imagery, and that the law is in place 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](#)
 - The National Center for Missing & Exploited Children's (NCMEC) [Take It Down tool](#) which can be used to help them anonymously remove images that have yet to be shared online but they think might be.

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.

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.
- That, if they asked to receive the photos, explain that they should not put pressure onto others to do things that they are uncomfortable with.

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:

- On the laws surrounding the sharing of indecent imagery.
- That the laws surrounding it apply to digitally manipulated and AI-generated imagery.
- 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.

9. Informing and supporting parents

The school will inform parents of an incident at the earliest available 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 children's social care and/or the police, who would take the lead in deciding when they should be informed.

The DSL will support children involved with determining the best 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 the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the education setting.
- Given support to deal with their own feelings of upset and concern, including signposting to further resources that can help them to understand the sharing of nudes and semi-nudes or support services they can contact, where appropriate.
- Given support on how to speak to their child about the incident.
- Advised on the law around the sharing of nudes and semi-nudes.
- Kept updated about any actions that have been taken or any support that their child is accessing, unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision.
- Informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline

counsellor [online](#) or on 0800 11 11, in house counselling services where available, or a GP. If they are concerned that their child is suicidal, they should contact 999.

- Directed to 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.
- To 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.
- 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 seek further medical advice and support if there have been similar incidents or they are worried about inappropriate sexual behaviour for their age.

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 delete images or videos from social media accounts, including from cloud photo backups.
- To consider ways that their child could speak to the sender to stop future correspondences or if the child prefers, how to block the sender.
- 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.

10. Multi-agency working

The school will develop trusting relationships between families and agencies to protect the welfare of its pupils and collaborate with services to achieve shared goals and share information.

In circumstances where a referral is appropriate to any external agency, such as police or social care 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 proactive information sharing between professionals and local agencies and will be aware that data protection regulations do not act as a barrier to sharing information where failure to do so would result in pupils being placed at risk of harm.

11. Searching devices, viewing, and deleting indecent imagery

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.

Viewing the imagery

Staff and parents will not intentionally view any sexual images or video 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 can't do in relation to viewing sexual images and will be expected to communicate this to any child or parent requesting that imagery be viewed.

The decision to view any imagery will be based on the professional judgement of the DSL and will always comply with the school's Child Protection and Safeguarding Policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to any child or involved.

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.

Staff will not 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 headteachers office.

- Ensure that images are viewed by an individual of the same sex as the pupil in the image, wherever possible.
- 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 both children and adults. 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 indecent imagery from devices and online platforms to limit any future sharing.

For incidents that have not been reported to police or children's social care, the school will record the reasons for not doing so and ensure this is signed off by the headteacher.

The school will also take the following actions:

- Remind the child that possession of nudes and semi-nudes is illegal
- Ask them to delete the imagery and to confirm that they have deleted them
- Give them a deadline for deletion across all devices, online storage, or social media sites
- Inform them that if they refuse or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence and the police may become involved
- 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

12. Monitoring and review

This policy will be reviewed at least annually by the DSL and the headteacher. 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. The next scheduled review date for this policy is 1st September 2025.