Knowledge-rich, skills-led learning for all
Christ at our heart
Serving everyone in our community
Partnership of love, ambition, joy and peace

St. Michael Catholic Primary and Nursery School

# Responding To Incidents Involving The Sharing Of Nudes And Semi-Nudes Policy

*I came so that you may have life, life in all its fullness" John 10:10*

St Michael Catholic Primary School and Nursery is a Catholic family of faith following the teachings of Christ. We strive to create an environment where all members of our school community respect the values of: Church, Independence, Resilience, Caring, Learning and Enjoyment for all. Belief in these values will nurture all as individuals and instil in them the confidence to meet their full potential, providing them with the best grounding for their future place in an ever-changing world.

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| **Policy Date** | September 2026 |
| **Signed by Head Teacher** | Mrs N Collins |
| **Review Date** | September 2027 |

## Introduction

At St Michael Catholic Primary and Nursery School, we recognise that children and young people are growing up in an increasingly digital world where technology plays a significant role in communication and relationships.

The sharing of nude or semi-nude images and videos is a safeguarding issue and should never be viewed solely as a behavioural concern or a technology issue.

The school adopts a safeguarding-first approach and follows current national guidance when responding to incidents involving the creation, possession or sharing of nude or semi-nude imagery.

All concerns relating to nude or semi-nude images, including AI-generated or manipulated imagery, will be managed through the school's safeguarding procedures and led by the Designated Safeguarding Lead (DSL).

The welfare of the child remains the school's primary consideration at all times.

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## Definition

For the purposes of this policy, the sharing of nudes and semi-nudes refers to:

• The creation, possession or sharing of nude or semi-nude images or videos of anyone under the age of 18.

• Images that are shared through mobile phones, tablets, computers, gaming platforms, social media or other online services.

• Images that have been shared with or without consent.

• Images which have been created, manipulated or altered using digital technology, including Artificial Intelligence (AI).

The creation, possession and sharing of such imagery may involve safeguarding concerns, criminal offences or both.

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## Key Principles

When responding to incidents, the school will:

• Take a safeguarding-first approach.

• Act in the best interests of the child.

• Avoid victim-blaming language.

• Assess risk carefully and proportionately.

• Support all children involved.

• Work with parents and carers where appropriate.

• Involve external agencies where necessary.

• Record concerns accurately on CPOMS.

• Follow safeguarding procedures at all times.

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## Responding to a Disclosure

Any disclosure relating to nude or semi-nude imagery should be treated as a safeguarding concern.

Staff receiving a disclosure should:

• Remain calm and non-judgemental.

• Listen carefully.

• Reassure the child.

• Avoid expressing shock or anger.

• Avoid making promises of confidentiality.

• Explain that information may need to be shared to keep them safe.

• Record the disclosure accurately.

• Report the concern immediately to the Designated Safeguarding Lead (DSL).

Children involved may experience:

• Fear

• Shame

• Anxiety

• Embarrassment

• Emotional distress

Staff should respond sensitively and supportively at all times.

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## Searching Devices

Staff should not routinely search, view or investigate images themselves.

Where a device needs to be secured:

### Staff should:

• Confiscate the device if appropriate.

• Switch the device off if advised to do so.

• Store the device securely.

• Inform the DSL immediately.

### Staff should not:

• Copy the image.

• Save the image.

• Share the image.

• Print the image.

• Forward the image.

• Upload the image.

The DSL will make decisions regarding any further action in line with safeguarding guidance.

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## Use and Viewing of Images

The school aims to avoid viewing images wherever possible.

Images should only be viewed where there is no alternative and it is necessary to establish the nature of the concern.

Where viewing is necessary:

• It must be authorised by the DSL.

• It should be proportionate.

• Decisions should be clearly recorded.

• Any viewing should follow safeguarding guidance.

The school will never send, save, print or distribute images.

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## Role of the Designated Safeguarding Lead (DSL)

The DSL will:

• Lead all decision-making.

• Undertake a risk assessment.

• Consider the level of safeguarding concern.

• Decide whether parents should be informed immediately.

• Decide whether external agencies should be contacted.

• Ensure concerns are recorded appropriately on CPOMS.

• Coordinate support for all children involved.

The DSL will consider:

• The child's age and developmental stage.

• Whether coercion is involved.

• Whether exploitation may be a factor.

• Whether there are wider safeguarding concerns.

• Whether a crime may have been committed.

• The vulnerability of those involved.

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## Informing Parents and Carers

Parents and carers will usually be informed where a child is involved in an incident involving nude or semi-nude imagery.

However, there may be occasions when informing parents immediately could increase risk to a child.

In these circumstances, decisions will be made in consultation with safeguarding agencies where appropriate.

The school will:

- Work sensitively with families.
- Provide information and support.
- Focus on safeguarding and wellbeing.
- Avoid blame or judgement.

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## Working with External Agencies

The school may work with:

- Children's Social Care
- Police
- Early Help Services
- Health Professionals
- Online Safety Services
- Other safeguarding partners

Referrals will be made where necessary to protect children and reduce risk.

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## Emerging Technologies and Artificial Intelligence

The school recognises that developments in technology have increased the risks associated with image sharing.

This includes:

• Artificial Intelligence (AI)

• Deepfakes

• Manipulated images

• Altered videos

• Image generation tools

• Online coercion

• Sextortion

Pupils are taught that AI-generated content may not be genuine and that digital images can be manipulated.

Any concerns involving AI-generated or manipulated imagery will be treated as safeguarding concerns.

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## Support for Children

Children involved in incidents may require ongoing support.

Support may include:

• Pastoral support

• Check-ins with trusted adults

• Mental health support

• Referral to appropriate services

• Safety planning

• Family support

The school recognises that the emotional impact may continue long after an incident has been resolved.

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## Prevention and Education

Prevention is a key part of the school's approach.

Through Computing, RSHE, Online Safety and safeguarding education, pupils are taught about:

• Healthy relationships

• Online behaviour

• Consent

• Privacy

• Digital footprints

• Respect

• Online risks

• Sharing images safely

• AI and manipulated media

• Seeking help when worried

Children are encouraged to speak to trusted adults if they have concerns.

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## Recording Concerns

All incidents will be recorded on CPOMS.

Records will include:

• Nature of the concern.

• Actions taken.

• Risk assessments completed.

• Agencies involved.

• Support provided.

• Outcomes.

All records will be stored securely and managed in accordance with safeguarding procedures.

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## Monitoring and Review

The implementation of this policy will be monitored by the DSL and Senior Leadership Team.

Monitoring will include:

- Safeguarding records.
- CPOMS reports.
- Online safety incidents.
- Staff training.
- Pupil voice.
- Curriculum provision.

The policy will be reviewed annually or sooner if changes to legislation, safeguarding guidance or technology require amendment.

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## Linked Policies

- Child Protection and Safeguarding Policy
- Child-on-Child Abuse Policy
- Online Safety Policy
- Behaviour Policy
- Anti-Bullying Policy
- Mental Health and Wellbeing Policy
- Data Protection Policy
- Computing Policy

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St Michael Catholic Primary and Nursery School is committed to safeguarding children and helping them develop the knowledge, skills and confidence required to navigate an increasingly digital world safely, responsibly and respectfully.