Mount C of E Primary Academy

Policy Document – Sexting in schools

According to Keeping Children Safe in Education 2026, 'sexting' is now referred to as 'Consensual and non-consensual sharing of nude and semi-nude images and/or videos'.

Schools need to be able to respond swiftly and confidently to ensure that children are safeguarded, supported and educated.
All incidents of youth produced sexual imagery must be dealt with as safeguarding concerns.

The law

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes where a student, under the age of 18, distributes images of themselves. 'Indecent' is 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. For most purposes, if imagery contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation, then it will be considered indecent. Indecent images may also include overtly sexual images of young people in their underwear.

Criminalisation of Children

Young people, who share sexual imagery of themselves, or peers, are breaking the law. Young people need education, support or safeguarding, not criminalisation.

The police response

School may respond to incidents without involving the police.

Initial response

When an incident involving youth produced sexual imagery comes to a school's attention:

- The incident must be referred to the Designated Safeguarding Lead (DSL) or the Deputy Designated Safeguarding Lead (DDSL) as soon as possible
- The DSL or DDSL will hold an initial review meeting with appropriate school staff
- There must be subsequent interviews with the young people involved (if appropriate)
- Parents/guardians must be informed at an early stage and involved in the process unless there is a good reason to believe that involving parents would put the young person at risk. See Annexe A.
- At any point in the process if there is a concern a young person has been harmed, or is at risk of harm, a referral must be made to children's social care and/or the police immediately. The parents/guardians will be informed unless there is a good reason that involving parents/guardians would put the young person at risk. See Annexe A.

Disclosure

All members of staff (including non-teaching) must be made aware of how to recognise and refer any disclosures of incidents involving youth produced sexual imagery.

Initial review meeting

An immediate referral to police and/or children's social care must be made if at this initial stage:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's development stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- You have reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If none of the above applies then the school may decide to respond to the incident without involving the police or children's social care (the school can choose to escalate the incident at any time if further information/concerns come to light).

Assessing the risks

When assessing the risks, the following should be considered:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact of the pupils involved?
- Do the pupils involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

Securing and handing over devices to the police

If any devices need to be seized and passed onto the police then the device(s) should be confiscated and the police called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

Searching devices, viewing and deleting imagery

Viewing the imagery

Adults must **not** view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery.

The decision to view imagery must be based on the professional judgement of the DSL and must always comply with the child protection policy and procedure of the school. Imagery must never be viewed if the act of viewing will cause significant distress or harm to the pupil.

If it is necessary to view the imagery then the DSL must:

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with Principal.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Principal.
- Ensure viewing takes place with another member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on school premises, ideally in the Principal's or a member of the senior leadership team's office.
- Ensure wherever possible that the images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

Deletion of images

If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting imagery from devices and online services to limit any further sharing of imagery.

The Searching, Screening and Confiscation advice (Education Act 2011) highlights that schools have the power to search pupils for devices, search data on devices and delete youth produced sexual imagery.

It is recommended that in most cases young people are asked to delete imagery and to confirm that they have deleted the imagery. Young people should be given a deadline for deletion across all devices, online storage or social media sites.

Recording incidents

All incidents relating to youth produced sexual imagery need to be recorded in school and held on CPOMS. This includes incidents that have been referred to external agencies and those that have not.

How should we teach young people about youth produced sexual imagery?

Learning about youth produced sexual imagery cannot be taught in isolation. The SLT will ensure that underpinning protective learning is being provided by the school's planned PHSE education programme and wider curriculum. This will include work on:

- communication
- understanding healthy relationships including trust

- understanding and respecting the concept of genuine consent
- understanding an individual's rights (especially the collective right to be safe and to feel safe)
- recognise abusive and coercive language and behaviours
- accepting an individual's responsibilities (especially responsibility to respect others trust and protect their right to be physically, emotionally and reputationally safe)

ANNEX A

When deciding whether to involve the police and/or children's social care, consideration must be given to the following questions. Answering these questions will support the DSL in considering whether a young person is at risk of harm, in which case a referral will be appropriate, whether additional information or support is needed from other agencies or whether the school can manage the incident and support the young people directly.

Do you have any concerns about the young person's vulnerability?
Why this question?
Consideration should be given to whether a young person's circumstances or background makes them additionally vulnerable. This could include being in care, having special educational needs or disability or having been a victim of abuse.

Where there are wider concerns about the care and welfare of a young person then consideration should be given to referring to children's social care.

Why was the imagery shared? Was it consensual or was the young person put under pressure or coerced?
Why this question?
Young people's motivations for sharing sexual imagery including flirting, developing trust in a romantic relationship, seeking attention or as a joke.

Though there are clearly risks when young people share imagery consensually, young people who have been pressured to share imagery are more likely to report negative consequences. A referral should be made to the police if a young person has been pressured or coerced into sharing an image, or imagery is being shared without consent and with malicious intent. Consideration should also be given to a young person's level of maturity and the impact of any special educational needs on their understanding of the situation.

Disciplinary action should be taken against pupils who pressure or coerce others into sharing sexual imagery. If this is part of pattern of behaviour then consideration should be given to making a referral to a Harmful Sexual Behaviour service, such as the National Clinical Assessment and Treatment Service (an NSPCC service).

Has the imagery been shared beyond its intended recipient? Was it shared without the consent of the young person who produced the imagery?
Why this question?
The imagery may have been shared initially with consent then passed on to others. A pupil may have shared the image further with malicious intent, or they may not have had a full understanding of the situation.
The police should be informed if there was a deliberate intent to cause harm by sharing the imagery or if the imagery has been used to bully or blackmail a pupil.

Has the imagery been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread of the imagery?
Why this question?
If the image has been shared widely on social media, this could cause significant embarrassment for the pupil and have a long term impact on their online reputation. It could also increase the risk of them being bullied or contacted by strangers online.
The young person involved should be supported to report the imagery to any sites it is hosted on.

If the young person has tried to report the imagery and it has not been removed the young person should contact ChildLine who work in partnership with the Internet Watch Foundation (IWF) to have youth produced imagery removed from the internet. You could also contact the Professionals Online Safety Helpline for advice and support.

If the young person is being contacted by people they don't know who have viewed the image then you should report to NCA-CEOP.

How old is the young person or young people involved?
Why this question?
Children under the age of 13 are unable to consent to sexual activity. Any imagery containing sexual activity by under 13s must be referred to the police.

Being older can give someone power in a relationship so if there is a significant age difference it may indicate the young person felt under pressure to take the image/video to share it.
Consideration should also be given to a young person's level of maturity and the impact of any special educational needs on their understanding of the situation.

If it is believed imagery contains acts which would not be expected of a young person of that age to engage in then you must refer to the police. The Brook Traffic Light tool provides guidance on harmful sexual behaviour at different ages.

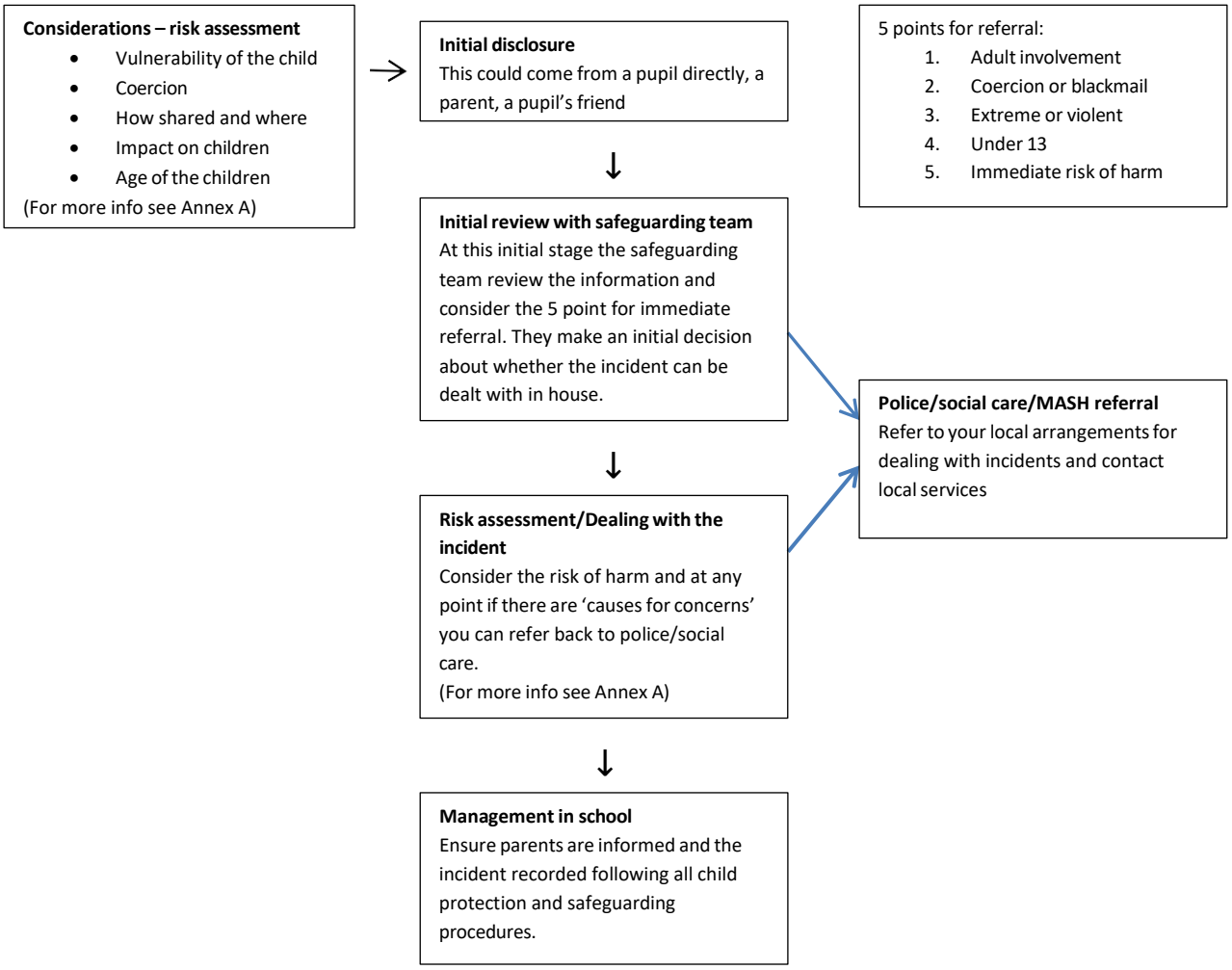
Did the young person send the image to more than one person?
Why this question?
If a pupil is sharing sexual imagery with multiple people this may indicate that there are other issues which they need support with. Consideration should be given to their motivations for sharing. If it is believed that there are wider safeguarding concerns then you must make a referral to children's social care.

Does the young person understand the possible implications of sharing the image?
Why this question?
Young people may produce or share imagery without fully understanding the consequences of what they are doing. They may not, for example, understand how it may put them at risk or cause harm to another young person. They may also not understand consent.
Exploring their understanding may help plan an appropriate response helping assessment, for example, of whether they passed on an image with deliberate intent to harm.

Are there additional concerns if the parents or carers are informed?
Why this question?
Parents must be informed of incidents of this nature unless there is a good reason to believe that informing them will put the young person at risk. This may be due to concerns about parental abuse or cultural or religious factors which would affect how they or their community would respond.

If a young person highlights concerns about involvement of their parents then the DSL should use their professional judgement about whether it is appropriate to involve and at what stage. If a school chooses not to involve a parent they must clearly record the reasons for not doing so. Where possible young people should be supported to speak with their parents themselves about the concerns.

Flowchart for responding to incidents



Please refer to the schools child protection/safeguarding policies for guidance on any safeguarding/child protection issues that this policy may highlight. The school's child protection/safeguarding policies can be found on the school's website. The Gloucestershire Safeguarding Children's Partnership policy can be found at www.gloucestershire.gov.uk/gscp