DULWICH COLLEGE
FOUNDED 1619

SHARING NUDES AND SEMI-NUDES (INCLUDING SEXTING)

This policy sets out the College's approach to the sharing of nudes and semi-nudes (i.e. the sending or posting of nude or semi-nude images, videos or live streams) by children and other young people. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person.

This can occur online, via 1:1 messaging, social media, gaming platforms, chat apps or forums, or involve sharing between devices via services like Apple's AirDrop which works offline.

Professionals may also refer to nudes and semi-nudes as:

- youth-produced sexual imagery or youth-involved sexual imagery
- indecent imagery (this is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18)
- sexting (many adults may use this term however some young people interpret sexting as writing and sharing explicit messages with people they know, rather than sharing images)
- image-based sexual abuse (this term may be used when referring to the non-consensual sharing of nudes and semi-nudes)

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. Whilst these terms are more often used in the context of adult-to-adult non-consensual image sharing offences, the College recognises that incidents of this nature can also involve children.

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

The law

Making, possessing and distributing indecent imagery of someone under 18 is illegal.

'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

The term 'indecent images' also includes pseudo-images which are computer-generated images that otherwise appear to be a photograph or video. These may be created using tools such as photo/video editing software, deepfake apps and generators (to combine and superimpose existing images or videos onto other images and videos), and AI text-to-image generators.

The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal.

Types of incident covered by this policy

Yes:	• a pupil creates and shares nudes and semi-nudes of themselves with a peer under the age of 18 • a pupil shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18 • a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18
No:	• the sharing of nudes and semi-nudes of under 18s by adults (18 and over) as this constitutes child sexual abuse; the College will always inform the police force as a matter of urgency • children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images

Our approach

The College is aware that sharing photos, videos and live streams online is part of daily life for many young people. Although most young people are not creating or sharing nudes of semi-nudes, the potential risks are significant. If the imagery is shared further, it may lead to embarrassment, bullying and increased vulnerability to blackmail and exploitation.

The College has produced guidance for pupils regarding the dangers of sharing nudes and semi-nudes.

The College has regard to all relevant sector guidance including:

- Sharing nudes and semi-nudes: advice for education settings working with children and young people;
- Guidance published by the UK Council for Child Internet Safety; and
- DfE's Guidance: Searching, Screening and Confiscation (Advice for schools).

Disclosure

Disclosure about the sharing of nudes or semi-nudes can happen in a variety of ways. The pupil affected may inform any member of staff. They may report through an existing reporting structure, or a friend or parent may inform someone in the College or colleague, or inform the police directly.

Any direct disclosure by a child or young person will be taken seriously. A child or young person who discloses they are the subject of an incident of sharing nudes and semi-nudes is likely to be worried about the consequences. It is likely that disclosure in the education setting is a last resort and they may have already tried to resolve the issue themselves.

All members of staff (including non-teaching staff) are aware of how to recognise and the need to refer any disclosure of incidents involving the sharing of nudes or semi-nudes. This is covered within staff training and in the College's Safeguarding (Child Protection) Policy.

Handling incidents

Nudes and semi-nude images, videos and live streams can be taken, and shared by and between young people, under a wide range of circumstances, and are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- young people find nudes and semi-nudes online and share them claiming to be from a peer
- young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include:
    - children and young people selling nudes or semi-nudes of others online
    - children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity
    - children and young people hacking a peer's account to share images more widely without consent to shame publicly
- children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them

Nude or semi-nude images, videos or live streams may include more than one young person.

Incidents can broadly be divided into two categories:

- **Aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can further be sub-categorised into:

    - **adult-involved**: adult offenders attempt to develop relationships by grooming young people, in criminal sex offences even without the added element of nudes and semi-nudes

    - **youth only – intent to harm**: these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people

    - **youth only** – **reckless misuse:** no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured; in these cases, 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:** incidents in which 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

    - **other:** cases that do not appear to have aggravating elements, but also do not fit into the romantic or attention-seeking sub-types; these involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives

Responding to incidents of sharing nudes and semi-nudes is complex because of its legal status. Whilst pupils who share nudes and semi-nudes of themselves, or peers, are breaking the law, they should not be unnecessarily criminalised; although the creation and sharing of images can be risky, the College recognises that it is often the result of their natural curiosity about sex and their exploration of relationships. Therefore, engaging in the taking or sharing of nudes and semi-nudes may not always be 'harmful' to all young people.

The College will consider incidents on a case-by-case basis, taking into account what is known about the pupils involved and if there is an immediate risk of harm. The College's response to an incident will differ depending on the motivations behind the incident and the appropriateness of the pupil's behaviour, and will be guided by the principle of proportionality.

Once a disclosure has been made:

- the Deputy Master Pupils & Safeguarding as Designated Safeguarding Lead (or a Deputy Designated Safeguarding Lead) will hold an initial review meeting with appropriate staff (this may include the staff member(s) who heard the disclosure)

- there will be subsequent interviews with the pupil(s) involved (if appropriate); images will only be viewed if it is necessary to safeguard the pupil

- parents will be informed at an early stage and involved in the process in order to support the pupil(s) (unless there is good reason to believe that involving them would put the pupil at risk of harm)

An immediate referral will be made to police and/or children's social care through the MASH or equivalent if at this initial stage:

1. The incident involves an adult (where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident)

2. There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)

3. From what is known about the images, it is suggested that they depict sexual acts which are unusual for the young person's developmental stage, or are violent

4. The images involve sexual acts and any pupil in the images or videos is under 13

5. The College reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

The College may not involve the police, for example where an incident can be defined as 'experimental', and there is no evidence of abusive or aggravating elements, but this will be at the discretion of the Deputy Master Pupils & Safeguarding (or in their absence a Deputy Designated Safeguarding Lead). The College may choose to escalate the incident at any time if further information/concerns are disclosed at a later date.

In dealing with cases, the College's primary concern will be the welfare and protection of the children and young people involved. However, disciplinary action may be taken against a pupil whose behaviour in relation to the sharing of nudes and semi-nudes is abusive, bullying or illegal.

Education

Teaching about safeguarding issues in the classroom can prevent harm by providing pupils with skills, attributes and knowledge to help them navigate risks. The College provides its pupils with opportunities to learn about the issue of sharing nudes and semi-nudes as part of its commitment to ensure that they are

taught about safeguarding, including online, through teaching and learning opportunities. This includes being taught what positive, healthy and respectful online relationships look like, and that sharing and viewing indecent images of children (including those created by children) is a criminal offence. The College enables pupils to understand their right to be treated with respect in a relationship and how they should treat others with the same dignity, equality and respect.

Related Policies

- Safeguarding (Child Protection) Policy
- Searching and Confiscation of Pupil Property Policy (Years 3 to 13)

Policy Owner:	Deputy Master Pupils & Safeguarding
Last Reviewed:	September 2026
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