

CHBP School Federation

Brunswick Park Primary and Nursery School
Osidge Lane,
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'As a federation, and as individual schools, we are committed to the wellbeing of all of our community - this is an integral part of each school's culture and ethos. Policies are formulated and implemented with this in mind, placing the wellbeing of all at the forefront at all times.'

Youth Produced Sexual Imagery Policy

SEPTEMBER 2026

Date policy last reviewed: Autumn 2026

Signed by:

Executive Headteacher Date: _____

Chair of Governors Date: _____

Last updated: 7th August 2026

Statement of intent

CHBP Federation is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

The federation as well as each individual school is committed to developing and maintaining a strong safeguarding culture where:

- Safeguarding is embedded in all policies and practice
- Pupils feel safe, heard and supported
- Staff are confident to raise and escalate concerns
- Leadership monitors safeguarding effectiveness continuously
- Learning from safeguarding incidents informs practice improvements

This policy sets out the school's procedures for responding to incidents involving the creation, possession or sharing of self-generated intimate images or videos (commonly referred to as "making or sharing nudes and semi-nudes") involving children under the age of 18.

The policy applies to:

- all pupils
- all staff
- volunteers
- governors
- contractors working within school

This policy should be read alongside:

- Child Protection and Safeguarding Policy
- Online Safety Policy
- Behaviour Policy
- Anti-Bullying Policy
- Acceptable Use Agreements
- Staff Code of Conduct

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Crime and Policing Act 2026
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2026) 'Working Together to Safeguard Children (WTSC) 2026'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2026) 'Keeping children safe in education 2026'
- Working Together to Improve School Attendance 2026
- Meeting Digital and Technology Standards for Schools and Colleges 2022
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

This policy operates in conjunction with the following school policies:

- Children Absent from Education Policy
- Child Sexual Exploitation (CSE) Policy
- Prevent Duty Policy
- Child-on-child Abuse Policy
- Anti-bullying Policy
- Suspension and Exclusion Policy
- Online Safety Policy
- Cyber-security Policy
- Pupils' Personal Electronic Devices Policy
- Staff ICT and Electronic Devices Policy
- Data Protection Policy
- Photography Policy
- Records Management Policy
- LAC Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Social, Emotional and Mental Health (SEMH) Policy
- Behaviour Policy
- Low-level Safeguarding Concerns Policy
- Youth-produced Sexual Imagery (YPSI) Policy
- Staff Disqualification Declaration Form
- Reporting Safeguarding Concerns Flowchart
- Use of reasonable force/restrictive interventions policy.

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1. Legal Framework

This policy has regard to:

- Keeping Children Safe in Education (KCSIE) 2026
- Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People (DfE/UKCIS)
- Children Act 1989 and 2004
- Sexual Offences Act 2003
- Protection of Children Act 1978
- Online Safety Act 2023
- Data Protection Act 2018

2. Definition

The term "making or sharing nudes and semi-nudes" refers to:

The sending, receiving, possessing, creating or sharing of nude or semi-nude images, videos or live streams by children under 18.

This includes:

- photographs
- videos
- livestreams
- screenshots
- AI-generated or digitally manipulated intimate images (including deepfakes)
- images shared through messaging apps, gaming platforms, social media, AirDrop or similar technologies.

3. Primary School Context

Whilst incidents are uncommon in primary-aged children, they can occur through:

- curiosity
- coercion
- peer pressure
- grooming
- online exploitation
- accidental sharing
- access to inappropriate online content

Any incident involving a primary-aged child should be regarded as a safeguarding concern.

Children should never be blamed or criminalised for seeking help.

4. Safeguarding Principles

The school will:

- place the child's welfare at the centre of decision-making
- respond calmly and without judgement
- avoid unnecessarily criminalising children
- protect children from further harm
- work in partnership with parents wherever appropriate
- involve external agencies where required
- maintain confidentiality on a need-to-know basis

5. Staff Responsibilities

If a member of staff becomes aware of an incident they must:

- remain calm
- reassure the child
- explain that they cannot promise confidentiality
- report immediately to the DSL
- make a factual written record
- preserve evidence where possible

Staff must not.

- view images unless there is no alternative
- copy images
- save images
- print images
- forward images
- share images with colleagues
- delete images before the DSL advises

Viewing images should only occur where absolutely necessary to safeguard a child and should normally be undertaken by the DSL or another authorised professional.

6. Role of the Designated Safeguarding Lead

The DSL will:

- assess immediate risk
- speak with the child
- establish what has happened
- determine whether any crime may have been committed
- consider whether the child is at risk of exploitation
- complete a safeguarding risk assessment
- record all decisions
- liaise with Children's Social Care where appropriate
- consult the police when necessary
- seek advice from the Local Authority Designated Officer or safeguarding partners where required

7. Risk Assessment

The DSL will consider:

- the child's age
- developmental stage
- capacity and understanding
- whether coercion was involved
- whether exploitation is suspected
- whether an adult is involved
- whether there is grooming
- whether the image has been widely shared
- any additional vulnerabilities
- SEND
- previous safeguarding concerns
- family circumstances

8. Managing Images

Where possible:

- images should not be viewed
- images should not be copied
- images should not be stored on school systems

If an image must be viewed to assess risk:

- only the DSL (or delegated safeguarding professional) should do so
- viewing should be recorded
- reasons must be documented
- no copies should be retained

9. Informing Parents

Parents will normally be informed.

However, the DSL may decide not to contact parents immediately if doing so may:

- place the child at greater risk
- compromise a police investigation
- increase the risk of honour-based abuse
- increase domestic abuse
- increase risk of significant harm

Such decisions will be recorded.

10. Police Involvement

The police will normally be consulted where:

- adults are involved
- coercion is suspected
- blackmail or extortion has occurred
- exploitation is suspected
- the child is at immediate risk
- there is malicious sharing
- there are multiple victims
- images involve sexual assault
- organised abuse is suspected

The school recognises that not every incident requires police involvement and decisions should follow DfE guidance.

11. Support for Children

Children involved will receive appropriate support which may include:

- pastoral support
- safeguarding support
- emotional wellbeing support
- counselling
- Early Help
- referral to Children's Social Care
- referral to specialist services

Support will be available for:

- the child who created the image
- the child whose image was shared
- children who received images
- witnesses where appropriate

12. Education and Prevention

The school will provide age-appropriate education through:

- Relationships Education
- Computing
- Online Safety
- assemblies
- safeguarding lessons
- circle time

Children will learn:

- how to stay safe online
- how to report concerns
- consent
- privacy
- respectful relationships
- the risks of sharing images

- where to seek help

13. Confidentiality

Information will only be shared with professionals who need to know.

Records will be stored securely within safeguarding systems.