



THOMAS ALLEYNES HIGH SCHOOL  
UTTOXETER

# Peer-on-Peer Abuse Policy and Youth Produced Sexual Imagery Policy

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Learning and Standards November 2021	
Date of next review	November 2022

## Introduction

The Governors, Senior Leadership Team, and all staff at Thomas Alleyne's High School are committed to the prevention, early identification and appropriate management of peer-on-peer abuse (as defined below) both within and beyond the school.

In particular, we:

- believe that in order to protect children, our school should
  - (a) be aware of the level and nature of risk to which our pupils are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding needs and
  - (b) take a contextual whole-school approach to preventing and responding to peer-on-peer abuse;
- regard the introduction of this policy as a preventative measure, and do not feel it is acceptable merely to take a reactive approach to peer-on-peer abuse;
- recognise increasing national and local concern about this issue (as highlighted in **KCSIE 2021** and SSCB level1 safeguarding training for all staff and volunteers) and wish to implement this policy in order to ensure that our pupils are safeguarded;
- encourage parents to communicate with the school so both parties can ensure that appropriate and prompt action is taken in response to any type of abuse from other peers.

This policy:

- sets out our strategy for preventing, identifying and appropriately managing peer-on-peer abuse.
- It is the product of a consultation of key updated legislation - In producing this policy we have consulted Keeping Children Safe in Education September **2021**, working together to safeguard children, the school safeguarding policy, the school mental health and wellbeing policy, safeguard leads at the school and pupils views.
- applies to all Trustees Governors, Senior Leadership Team, staff and volunteers. It will be reviewed annually, and updated, as may be required, to ensure that it continually addresses the risks to pupils. A number of staff and pupils are involved in each annual review, which involves and is informed by an assessment of the impact and effectiveness of this policy over the previous year. Key document (Keeping Children Safe in Education **2021**, school safeguarding policy etc) changes will also be taken into account to ensure current legislation is being followed.
- is the school's overarching policy for any issue that could constitute peer-on-peer abuse. It relates to, and should be read alongside, the school's safeguarding policy, mental health and wellbeing policy, anti-bullying policy, e-safety policy, children missing in education and the rewards and sanctions policy.
- uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18. We have nonetheless chosen not to restrict our approach to peer-on-peer abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all pupils, regardless of age.

- is compliant with the statutory guidance on peer-on-peer abuse as set out in *Keeping Children Safe in Education* (September 2021)
- should be read in conjunction with the Staffordshire Safeguarding Children Board's (SSCB) Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

## Peer on peer/ child on child abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

These types of abuse rarely take place in isolation and often indicate wider safeguarding concerns.

Any response to peer-on-peer abuse therefore needs to consider the range of possible types of peer-on-peer abuse set out above and capture the full context of children's experiences.

When dealing with behaviour which involves reports of, for example, emotional and/or physical abuse, all staff but in particular safeguarding staff decide how to respond depending on the following posed questions. This could include, for example, whether it:

- is socially acceptable
- involves a single incident or has occurred over a period of time
- is socially acceptable within the peer group
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning
- involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power
- involves a misuse of power

The school recognises that the importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual pupil basis, but could also apply across groups of pupils or the whole pupil body. Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which our school needs to take a whole-school approach in order to prevent escalation. For example, where a group from one gender are making inappropriate comments about the other gender, one-off sanctions are unlikely to be effective and wider actions should be considered, such as arranging for an external person to deliver a year group intervention exercise.

It will also be important to consider the wider context in which the alleged behaviour is reported to have occurred, and which may trigger the need for a referral. For example, some behaviour that is considered inappropriate may be capable of being dealt with internally. However, if there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject of the concern(s)/allegation(s) is considered or suspected by the DSL to constitute peer-on-peer abuse, the school will follow the procedures set out in the school safeguarding policy.

All staff are aware of this policy, the school safeguarding policy and **KCSIE 2021** so they are fully aware of the importance of pupils well-being and understand the signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

## **Sexual violence and sexual harassment between children in schools and colleges**

Context: Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts.

Dismissing or tolerating such behaviours risks normalising them.

### **What is sexual violence and sexual harassment?**

Sexual violence It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. KCSIE 2021 Part 1.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1021914/KCSIE\\_2021\\_September\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf)

## **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and
- upskirting.

## **Upskirting**

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

## **The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse and can include:

- (a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected;
- (b) physical injuries;
- (c) experiencing difficulties with mental health and/or emotional wellbeing;
- (d) becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much;
- (e) broader changes in behaviour including alcohol or substance misuse;
- (f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- (g) abusive behaviour towards others.

Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff are alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards.

Any child can be vulnerable to peer-on-peer abuse due to the strength of peer influence during adolescence, and all staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to peer-on-peer abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family. Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to peer-on-peer abuse. Children who are

questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers.

The school actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by educating all Senior Leadership Team, staff, volunteers and pupils about this issue. All pupils are educated about peer-on-peer abuse via the Citizenship curriculum and the wider curriculum. Pupils are told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the school's approach to such issues, including its zero-tolerance policy towards all forms of peer-on-peer abuse.

The school ensures we are:

- challenging the attitudes that underlie such abuse (both inside and outside the classroom);
- working with Trustees, Governors, Senior Leadership Team, all staff and volunteers, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community;
- creating conditions in which our pupils can aspire to and realise safe and healthy relationships;
- creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to; and
- responding to cases of peer-on-peer abuse promptly and appropriately.

#### *Multi-agency working*

The school actively engages with its local partners in relation to peer-on-peer abuse, and works closely with, for example, Staffordshire Safeguarding Children's Board (SSCB), Staffordshire Police, local PCSO's, children's social care, and/or other relevant agencies, and other schools. The relationships the school has built with these partners are essential to ensuring that the school is able to prevent, identify early and appropriately handle cases of peer-on-peer abuse.

They help the school:

- (a) to develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist;
- (b) to ensure that our pupils are able to access the range of services and support they need quickly;
- (c) to support and help inform our local community's response to peer-on-peer abuse;
- (d) to increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our pupils.

The school actively refers concerns/allegations of peer-on-peer abuse where necessary to Staffordshire Police children's social care (first response), and/or other relevant agencies. This is particularly important because peer-on-peer abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

It is essential that all concerns/allegations of peer-on-peer abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our school.

Any response should:

- include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred and where appropriate added to SIMS and/or “My Concern” portal;
- treat all children involved as being at potential risk - while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. We will ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter;
- take into account:
  - that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider socio-cultural contexts - such as the child's/children's peer group (both within and outside the school); family; the school environment and the child/children's online presence.
  - the potential complexity of peer-on-peer abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting;
  - the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL will discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made. The school will manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

**What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?**

**If a pupil is in immediate danger, or at risk of significant harm, a referral to children's social care and/or the police should be made immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made (See the safeguarding procedures in the school safeguarding policy).**

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.

If a child speaks to a member of staff about peer-on-peer abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement.

### **How will our school respond to concerns or allegations of peer-on-peer abuse?**

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

The DSL will use their professional judgement to determine whether it is appropriate for alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult with children's social care and/or the Staffordshire safeguarding advice line and/or any other external agencies on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL will contact first response or Staffordshire police immediately, and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the allegations/concerns with the appropriate agencies and agree on a course of action, which may include:

#### **A - Manage internally with help from external specialists where appropriate and possible**

*Where behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the school may need to handle allegations/concerns internally. In these cases, the school will engage and seek advice from external specialists.*

#### **B – Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family**

*These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services.*

#### **C – Refer child/children to children's social care for a section 17 and/or 47 statutory assessment**

*As a matter of best practice, if an incident of peer-on-peer abuse requires referral to and action by children's social care and a strategy meeting is convened, then the school will hold every professional involved in the case accountable for their safeguarding response.*

#### **D – Report alleged criminal behaviour to the Police**

*Alleged criminal behaviour will be reported to the Police. All concerns/allegations will be assessed on a case by case basis.*

Where there is an incident of peer-on-peer abuse the school will assess and address the nature and level of risks that are posed and/or faced by the child; engage the

child's parents and draw upon local services and agencies to ensure that the child's needs are met in the long-term. Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child. If at any stage the child's needs escalate, the DSL will contact the relevant agencies.

The school will consider whether disciplinary action may be appropriate for any child/children involved (following the rewards and sanctions policy) – any such action will address the abuse, the causes of it, and attitudes underlying it.

Disciplinary action may sometimes be appropriate, including

- (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;
- (b) to demonstrate to the child/children and others that peer-on-peer abuse can never be tolerated; and
- (c) to ensure the safety and wellbeing of other children. However, these considerations will be balanced against the child's/children's own potential unmet needs and any safeguarding concerns.

Before deciding on appropriate action the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the peer-on-peer abuse and the causes of it.

Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the school. Disciplinary interventions alone are rarely able to solve issues of peer-on-peer abuse, and the school will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

The school's response to concerns/allegations of peer-on-peer abuse will be part of on-going proactive work by the school to embed best practice and take a whole-school approach to such abuse. As such the school's response will become part of its wider prevention work. This response will include the school asking itself a series of questions about the context in which an incident of peer-on-peer abuse occurred in the school, the local community in which the school is based, and the wider physical and online environment - such as:

- (a) how did the school's physical environment contribute to the abuse, and how can the school address this going forwards,
- (c) did wider gender norms, equality issues and/or societal attitudes contribute to the abuse?
- (d) does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse?
- (e) how have similar cases been managed in the past and what effect has this had?
- (f) does the case or any identified trends highlight areas for development in the way in which the school works with children to raise their awareness of and/or prevent peer-on-peer abuse, including by way of the school's PSHE/Citizenship curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work?

- (g) are there any lessons to be learnt about the way in which the school engages with parents to address peer-on-peer abuse issues?
- (h) are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?
- (i) does this case highlight a need to work with certain children to build their confidence and teach them how to identify and manage abusive behaviour? and
- (j) were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the school?

## **Sources**

Sexual violence and sexual harassment between children in schools and colleges - DFE 2018

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

Keeping Children Safe in Education 2020

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/912593/Keeping\\_children\\_safe\\_in\\_education\\_part\\_1\\_Sep\\_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912593/Keeping_children_safe_in_education_part_1_Sep_2020.pdf)

## Appendix A – Contact details for local agencies

### First Response

Email -

<https://www.staffordshire.gov.uk/health/childrenandfamilycare/childprotection/First-Response/Report-online/Report-a-concern-online.aspx>

Tel – 08001313126

### Emergency Duty Service (Outside office hours):

Tel - 0845 6042886

### Staffordshire Safeguarding Advice Service

Tel- 01785 895836

### Staffordshire Safeguarding Children’s Board

Website - [www.staffsscb.org.uk](http://www.staffsscb.org.uk)

Email - [sscb.admin@staffordshire.gov.uk](mailto:sscb.admin@staffordshire.gov.uk)

Tel - 01785 277151

### Staffordshire Police

Emergency Tel – 999

Non-Emergency Tel – 101

## Appendix B – Youth Produced Sexual Imagery Policy

Consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>36</sup> is also known as sexting or youth produced sexual imagery (KCSIE 2021)

This policy uses the term 'sharing nudes and semi-nudes' to mean 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 term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams 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:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1008443/UKCIS\\_sharing\\_nudes\\_and\\_semi\\_nudes\\_advice\\_for\\_education\\_settings\\_Web\\_accessible\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008443/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings_Web_accessible_.pdf))

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.' Yet, recent NSPCC research has revealed that when children are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know.' Similarly, a recent ChildLine survey has revealed that many parents think of sexting as flirty or sexual text messages rather than images.

This policy only covers the sharing of sexual imagery by children. Creating and sharing sexual photos and videos of under-18s is illegal, and therefore causes the greatest complexity for the school when responding. It also presents a range of risks which need careful management. **Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal.**

On this basis, this policy introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting'. This is to ensure clarity about the issues this advice addresses.

### What is youth produced sexual imagery?

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes children sharing images that they, or another child, have created of themselves.
- 'Sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy); **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.**

**Terms such as 'revenge porn' and 'upskirting'<sup>6</sup> are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.**

### What types of incidents are covered by this policy?

**Yes:**

- A child creates and shares sexual imagery of themselves with a peer (also under the age of 18).
- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult.
- A child is in possession of sexual imagery created by another child.

### Disclosure

Disclosure about youth produced sexual imagery can happen in a variety of ways. The child affected may inform a class teacher, the DSL in the school, or any member of the school staff. They may report through an existing reporting structure, or a friend or parent may inform someone in the school, or inform the police directly.

All members of staff (including non-teaching staff) are aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. This will be covered within staff training and within the school's safeguarding policy.

Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

The UK Council for Internet Safety (Dec 2020) provides guidance to schools which Thomas Alleyne's has used to develop this policy.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1008443/UKCIS\\_sharing\\_nudes\\_and\\_semi\\_nudes\\_advice\\_for\\_education\\_settings\\_Web\\_accessible\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008443/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings_Web_accessible_.pdf)

The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of any children and young people involved. Individual incidents of peer abuse and sexual behaviour (the sharing of nudes and semi nudes can fall under this category) can lead to unhealthy or damaging cultures within the school community. How these incidents – including incidents of 'low level' harmful sexual behaviour – are responded to directly affects the culture of the school.

It is useful to consider the motivation when considering our school response.

Research shows the following motivations:

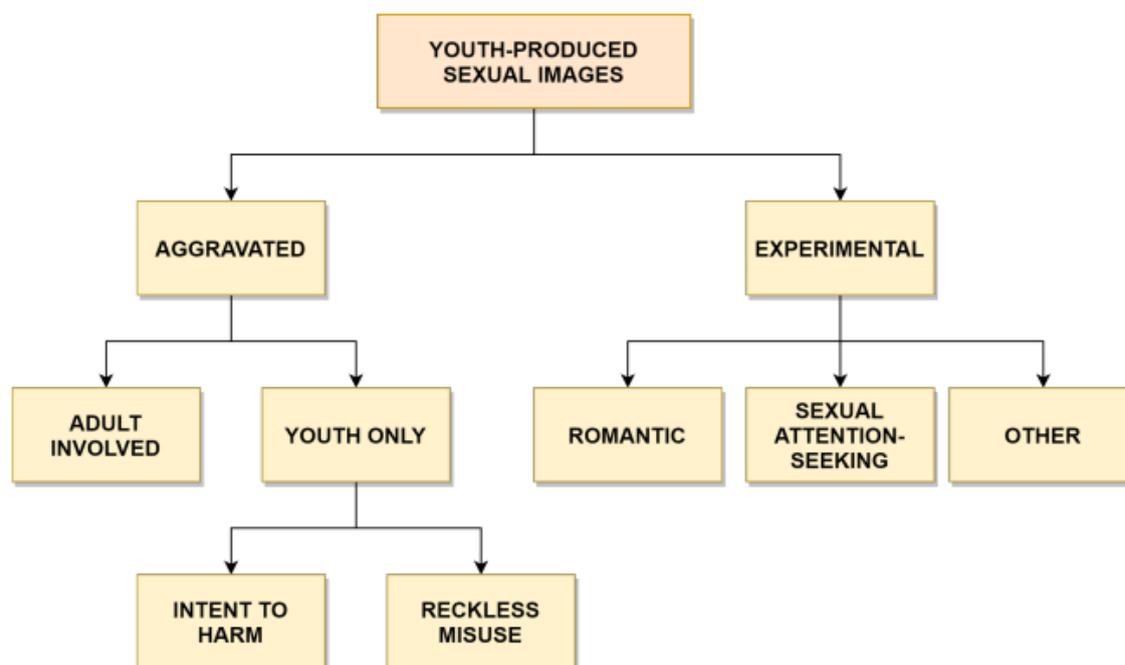


Fig 1: Sexting, a typology (Finkelhor and Wolak)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1008443/UKCIS\\_sharing\\_nudes\\_and\\_semi\\_nudes\\_advice\\_for\\_education\\_settings\\_Web\\_accessible\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008443/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings_Web_accessible_.pdf)

## Handling incidents

All incidents involving youth produced sexual imagery should be responded to in line with the School's safeguarding policy.

When an incident involving youth produced sexual imagery comes to a member of

staff's attention:

- The incident should be referred to the DSL as soon as possible.
- The DSL will hold an initial review meeting with appropriate school staff.
- The DSL will follow the procedures and guidance set out in *Sexting in schools and schools: responding to incidents and safeguarding children*.
- There will be subsequent interviews with the children involved (if appropriate).
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm.
- At any point in the process if there is a concern a child has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately.

The incident should be dealt with proportionally to the behaviour being displayed:

Appropriate	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviours	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Behaviour accepted by peers within peer group context	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure victim compliance	Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
Shared decision-making	Generally consensual and reciprocal	Consent issues may be unclear	Intrusive	Sadism
		May lack reciprocity or equal power	Informed consent lacking or not able to be freely given by victim	
		May include levels of compulsivity	May include elements of expressive violence	

Fig 2: Adapted from 'A continuum of children and young people's sexual behaviours' (Hackett, 2010)

In many cases, education settings may respond to incidents without involving the police, for example where an incident can be defined as 'experimental' and there is no evidence abusive or aggravating elements. The police may, however, need to be involved in some cases to ensure thorough investigation, including the collection of all evidence (for example, through multi-agency checks). Where there are abusive and/or aggravating factors, incidents will always be referred to the police through the Multi-Agency Safeguarding Hub (MASH) or First Response.

Please see appendix B1 for SSCB flow chart.

## Education

Teaching about safeguarding issues in the classroom can prevent harm by providing

children with skills, attributes and knowledge to help them navigate risks. The school will provide children with opportunities to learn about the issue of youth produced sexual imagery, as part of its commitment to ensure that they are taught about safeguarding, including online, through teaching and learning opportunities.

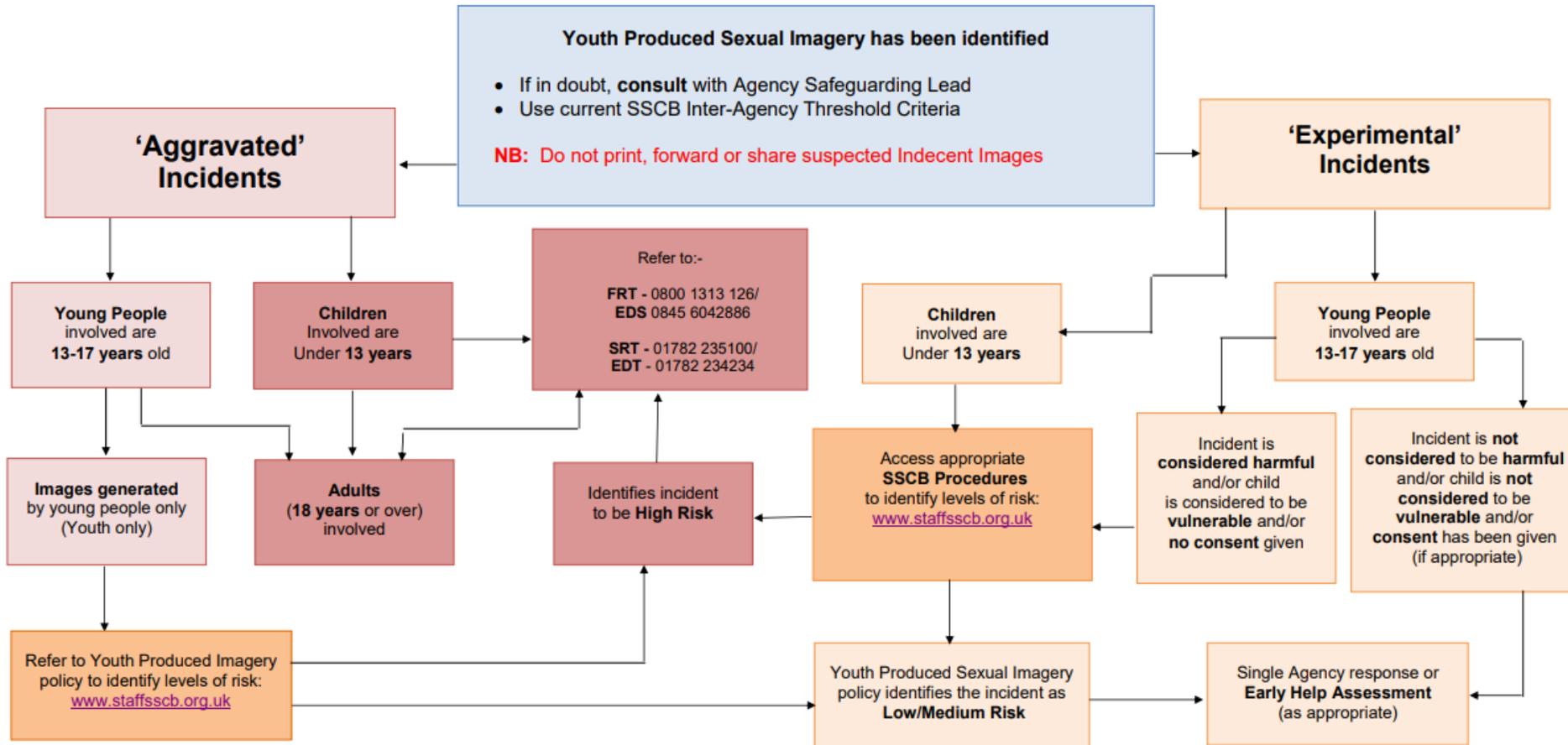
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/759007/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759007/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1021914/KCSIE\\_2021\\_September\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf)

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Please see the diagram on the next page (appendix B1) [Section 6Da - Responding to Youth Produced Sexual Imagery - September 2017 \(staffsscb.org.uk\)](#)

## Responding Youth Produced Sexual Imagery Process



**Youth Produced Sexual Imagery has been identified**

- SSCB - E-Safety Policy
- SSCB - Child Sexual Exploitation
- SSCB - Child Sexual Exploitation Risk Factor Matrix
- SSCB - Children who Display Sexually Harmful Behaviour
- SSCB - Sexually Active Children and Young People Guidance
- Guidance for Police dealing with sexting - [http://www.college.police.uk/News/College-news/Documents/Police\\_action\\_in\\_response\\_to\\_sexting\\_-\\_briefing\\_\(003\).pdf](http://www.college.police.uk/News/College-news/Documents/Police_action_in_response_to_sexting_-_briefing_(003).pdf)