

Making and Sharing Nudes and Semi-nudes including those generated using AI Policy (previously Youth Involved Sexual Imagery Policy)

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Approving Body	Trust Board
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Owner	Trust CEO
Applies to	All Trust Schools, all Trust staff

Version	Date	Reason
1.0	September 2021	To establish a trust-wide policy
2.0	September 2022	To reflect updates to Keeping Children Safe In Education 2022
3.0	July 2023	Reviewed as part of the review cycle
4.0	July 2024	Reviewed as part of the review cycle
5.0	July 2025	Reviewed as part of the review cycle
6.0	July 2026	Revised to align with Keeping Children Safe in Education 2026. Renamed - previously “Youth Involved Sexual Imagery Policy”

The making or sharing nudes and semi-nudes including those generated using AIPolicy for Initio Learning Trust is based on a template provided by Farrer & Co; it reflects the Dorset and BCP Interagency Safeguarding Procedures and 'Keeping Children Safe in Education' 2026.

In drawing up the Trust's Making or sharing nudes and semi-nudes including those generated using AI Policy, the Trust has considered the range of people who will refer to the Policy i.e. trustees, leaders, teaching staff, support and lunch staff, parent helpers, volunteers, supply staff etc, as well as students and parents. The Trust will monitor the implementation of the Policy as part of its annual monitoring cycle and will consider such issues as:

- How does the Trust and its schools demonstrate that staff have read and applied this Policy?
- The implications of the Policy on training for staff, trustees, leaders, DSLs etc.
- The ongoing involvement of the school's Children's Safeguarding Board in implementation of the Policy

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1. Introduction

This policy outlines Initio Learning Trust and its school's response to incidents of making or sharing nudes and semi-nudes, including those generated using AI. It relates to, and should be read alongside:

- The Safeguarding and Child Protection Policy
- Behaviour Policy
- Exclusions Policy
- Anti-Bullying Policy
- Online Safety Policy
- Child on Child (including harassment and violence) Abuse Policy

This policy only covers the involvement of children in sexual imagery. Creating, keeping and/or sharing sexual photos and videos of under-18s is illegal, and is classified as the making, possession or distribution of indecent images of a minor - under the Protection of Children Act 1978 (making and/or distribution) and the Criminal Justice Act 1988 (possession). As such it causes the greatest complexity for schools when responding. It also presents a range of risks which need careful management.

2. What is making or sharing nudes and semi-nudes, including those generated using AI?

This policy uses the term making or sharing nudes and semi-nudes, including those generated using AI 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'. Many professionals may refer to Self-Generated and AI-Generated Intimate Imagery as:

- nudes and semi-nudes
- Making or sharing nudes and semi-nudes, including those generated using AI
- 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, including those generated using AI

The motivations for making or sharing nudes and semi-nudes, including those generated using AI, 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 Self-Generated and AI-Generated Intimate Imagery online and share them claiming to be from another person.

- children and young people digitally manipulate an image of a young person into an existing nude online, specifically including images or videos generated or altered using Artificial Intelligence.
- images created or shared are used to abuse children e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

The making or sharing nudes and semi-nudes, including those generated using AI can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

Making or sharing nudes and semi-nudes, including those generated using AI, videos or live streams may include more than one child or young person.

The types of incidents which are covered in this policy are:

- A person under the age of 18 making or sharing nudes and semi-nudes, including those generated using AI of themselves with another person under the age of 18
- A person under the age of 18 making or sharing nudes and semi-nudes, including those generated using AI by another person under the age of 18 with a person under the age of 18
- A person under the age of 18 is in possession of nudes and semi-nudes, including those generated using AI created by another person under the age of 18

This policy does not cover:

- the making or sharing nudes and semi-nudes, including those generated using AI of under 18s by adults (18 and over) as this constitutes child sexual abuse and the Trust and its schools will always inform the police 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

In response to these issues, the Trust and its schools will follow the Trust's Safeguarding and Child protection policy and will also refer to the Department for Education's (DfE's) Keeping Children Safe in Education 2026.

3. Disclosure:

Disclosure about making or sharing nudes and semi-nudes, including those generated using AI can happen in a variety of ways. The child may inform a member of staff. Alternatively, a friend or parent may inform a member of staff or the police may have been informed directly. There is also the possibility that a member of staff may be made aware of an image in circulation by other students not involved but who have been exposed to imagery as a result of wider distribution.

All members of staff should be aware, recognise and refer any disclosures of incidents of making or sharing nudes and semi-nudes, including those generated using AI. Any direct disclosure by a child should be taken seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is possible that a disclosure is the last resort as they may have tried to resolve the issue themselves.

4. Responding to incidents:

All incidents involving making or sharing nudes and semi-nudes, including those generated using AI should be responded to in line with the Trusts Safeguarding and Child Protection policy, Child on Child abuse policy and Behaviour policy.

When an incident of making or sharing nudes and semi-nudes, including those generated using AI comes to the attention of any member of staff in a setting:

- the incident should be referred to the DSL as soon as possible, **images or videos should not be viewed**
- the DSL should hold an initial review meeting with appropriate staff. This may include the staff member who heard the.
- The DSL will follow the procedures and guidance set out in UKCIS - [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK](#)
- It may be appropriate that there should be subsequent interviews with the children involved.
- parents and carers should be informed at an early stage and involved in the process in order to best support the child unless there is good reason to believe that involving them would put the child at risk of harm
- a referral should be made to CHAD and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

5. Education

Educating children about safeguarding issues can prevent harm by providing the children with skills, attributes and knowledge to help them navigate the risks. The Trust and its schools will provide the children with opportunities to learn through Relationship and sex education, PSHE and the wider curriculum.

References

- UKCIS - Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK
- CEOP – Child Exploitation and Online Protection command 🏠 Childline
- IWF – Internet Watch Foundation
- Keeping Children Safe in Education 2026