



# **Kent and Medway responding to nude and semi-nude image sharing: guidance for professionals**

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<b>Summary of Purpose</b>	The purpose of this guidance is to assist those working with children and young people in Kent and Medway to respond to nude and semi-nude image sharing. This guidance has been informed by and adapted from UK Council for Internet Safety ‘ <a href="#">Sharing nudes and semi-nudes: advice for education settings working with children and young people</a> ’ guidance.
<b>Accessibility</b>	This document can be made available in large print, or in electronic format. There are no copies currently available in other languages.
<b>Equalities Impact Assessment</b>	During the preparation of this policy and when considering the roles and responsibilities of all agencies, organisations and staff involved, care has been taken to promote fairness, equality, and diversity, in the services delivered regardless of disability, ethnic origin, race, gender, age, religious beliefs or sexual orientation.
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<b>Policy Review Date</b>	This document will be reviewed in March 2026.

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## 1. Introduction

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This guidance applies to all agencies working with children and young people in Kent and Medway and has been developed to establish understanding and a shared procedure for responding to concerns consistently across agencies and localities. It has been informed by and adapted from UK Council for Internet Safety 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance<sup>1</sup>.

## 2. What is 'nude or semi-nude' image sharing?

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- Nude or semi-nude image sharing (also referred to as youth produced/involved sexual imagery, or sexting) can be defined as images or videos generated by children under the age of 18 that are of a sexual nature or may be indecent. These images may be shared between children and young people and/or adults via a mobile phone, webcam, handheld device, or website/app.
- Responding to incidents of sharing nudes and semi-nudes is complex because of its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. (Crime and Justice Act 1988 – Section 160<sup>2</sup>, and Protection of Children Act 1978 – Section 1.1 A<sup>3</sup>). Indecent imagery does not always mean nudity; however, images are likely to be defined as such if they involve nude or semi-nude sexual posing or any sexual activity involving a child.
- Children and young people engaging in nude and semi-nude image sharing should not be unnecessarily criminalised. Children and young people with a criminal record face stigma and discrimination in accessing education, training, employment, travel and housing and these obstacles can follow them into adulthood.

**NB: professionals must not print, forward, distribute or save any images or content believed to be an indecent image. This guidance does not apply to adults (over 18s) sharing nudes or semi-nudes of under 18s. This is child sexual abuse and must be referred to the police and/or local authority children's services as a matter of urgency.**

For young people aged 18+, professionals should be aware of the Criminal Justice and Courts Act 2015<sup>4</sup> which states that sexually explicit images or videos of adults shared electronically without consent, with the intent to cause distress is illegal. This is also known as 'revenge pornography' and includes the sharing of images without consent both on and

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<sup>1</sup> [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614441/sharing_nudes_and_semi_nudes_advice_for_education_settings_working_with_children_and_young_people.pdf)

<sup>2</sup> [Criminal Justice Act 1988 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1988/45/part/II/chapter/II/section/160)

<sup>3</sup> [Protection of Children Act 1978 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1978/31/part/II/chapter/II/section/1.1)

<sup>4</sup> [Criminal Justice and Courts Act 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2015/2/section/75)

offline and the physical distribution of images. The Domestic Abuse Act 2021<sup>5</sup> extended this offence to cover making threats to disclose such material. Additional advice and guidance regarding ‘revenge pornography’ is available from the Revenge Porn Helpline.

### 3. Nude and semi-nude image sharing within the wider safeguarding context

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Whilst creating and sharing nude or semi-nude images can be risky, it can also be result of natural curiosity and sexual development and may not be ‘harmful’ in all situations. However, it should always raise professional curiosity and, may require further action or involvement from other agencies. Concerns should be addressed on a case-by-case basis, and responses may vary depending on what is known about the context of the image taking and/or sharing, the children involved and if there is an immediate risk of harm.

Multi-agency safeguarding action will be required in all cases where there is risk of significant harm, meaning a child has been ill-treated or abused and there is a risk of impairment to their health and/or development compared with that which could reasonably be expected of a similar child.

### 4. Categorising nude and semi-nude image sharing

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Finkelhor and Wolak’s typology of youth-produced imagery cases can be used to define and assess incidents according to motivations.

#### **Aggravated**

This is the case for incidents involving additional or abusive elements regarding the creation, sending or possession of nudes and semi-nudes. This may include the involvement of adults or unknown individuals, for example someone soliciting sexual images from children and young people and can involve criminal or abusive behaviour by children themselves, such as sexual violence or harassment. It can further be sub-categorised into:

- **Adult involved:** adult offenders (18+) may attempt to develop relationships or abuse children and young people by ‘grooming’ them to engage in criminal sex offences on or offline. Victims can be abused by adult family friends, relatives, community members or be contacted solely via the internet. The images can be solicited by adult offenders without an intention to meet in person. For example, a 16-year-old is coerced into sharing sexual images of themselves with a 25-year-old.
- **Youth only – intent to harm:** these cases can arise from interpersonal conflict between children and young people, such as blackmail, threats, or deception, or sexual abuse, and exploitation, where images have been deliberately taken and/or shared with the intent to cause harm or distress. For example, a 14-year-old shares nude images of an ex-partner to humiliate them after a breakup.

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<sup>5</sup> [Domestic Abuse Act 2021 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/2021/32/contents)

- **Youth only – reckless misuse:** no intent to harm but images are taken or shared without the knowledge of or willing participation of the child or young person who is pictured. In these cases, pictures may be taken or sent thoughtlessly or recklessly but a victim has been harmed as a result. For example, a 15-year-old takes a nude photo of their friend whilst they are changing and shares it online as ‘a joke’.

Aggravated cases are always likely to need to be reported and/or discussed with the local authority children’s services and/or the police. Wider contextual information should be explored, and the relevant Kent Safeguarding Children Multi-Agency Partnership (KSCMP) and Medway Safeguarding Children Partnership (MSCP) safeguarding procedures should be used to help inform professionals decision making regarding referrals to external agencies. For ‘youth only’ concerns, education settings should follow ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’<sup>6</sup> and part five of Keeping Children Safe in Education, child-on-child sexual violence and sexual harassment’<sup>7</sup>.

## Experimental

These are incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. It can further be sub-categorised into:

- **Romantic:** young people in ongoing consensual and age-appropriate relationships, make images for themselves or each other, and the images are not distributed beyond the pair. For example, two 16-year-olds in a relationship, sharing sexual images, which are not shared beyond their relationship.
- **Sexual ‘attention seeking’:** this describes cases in which images are made and sent between or amongst young people who were not known to be romantic partners, or where one young person takes pictures and sends them to others or posts them online. For example, a 13-year-old shares a nude image with a peer when ‘flirting’ with them. The phrase ‘sexual attention seeking’ is taken directly from the typology, however it is important to note that incidents within this subcategory can be a part of normal childhood development and a child or young person should not be blamed or shamed for taking and sharing their image.
- **Other:** includes cases that do not appear to have aggravating elements but also do not fit into other experimental sub-categorises. These may involve young people taking pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children who do not appear to have sexual motives. For example, an 11-year-old taking pictures of their own genitals because they find it ‘funny’.

Professionals should be mindful that ‘experimental’ behaviour, especially that which may not initially appear to be sexually motivated, may occur as a result of harmful sexual behaviour or sexual abuse being ‘normalised’ for children and young people. If

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<sup>6</sup> <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

<sup>7</sup> <https://www.gov.uk/government/publications/keeping-children-safe-in-education-2>

‘experimental’ images are shared online by a young person with unknown individuals or are requested or sent by unknown individuals, consideration should be given to making a referral to explore the possible risk of harm posed.

If children or young people engaging in experimental incidents are aged 12 or under, or could be considered to be vulnerable, wider contextual information should be considered, and existing KSCMP and MSCP safeguarding procedures should be followed.

### **Risk management**

It is expected that all agencies will exercise professional judgement regarding responding to nude and semi-nude image sharing concerns. When an incident involving nudes and semi-nudes comes to the attention of any professional:

- The incident should be managed by an appropriate member of staff, for example, the agency named or designated safeguarding lead (or equivalent) as soon as possible.
- The agency safeguarding lead/designated practitioner should undertake an initial review to gather information and understand the context of the concern. This may include speaking with members of staff and all children and young people involved, if appropriate. The initial review should consider the initial evidence and aim to establish:
  - whether there is an immediate risk to any child or young person
  - if a referral should be made to the police and/or local authority children’s services
  - what further information is required to decide on the best response
  - whether the image(s) has been shared widely and via what services and/or platforms
  - whether immediate action can be taken to delete or remove images/videos from devices or online services
  - any relevant facts about the children or young people involved which would influence risk assessment
  - if there is a need to contact another setting or individual
- Parents and carers should be informed at an early stage and involved in the process, unless there is reason to believe involving them would put the child or young person at risk of harm.
- A referral should be made to the local authority children’s services and/or 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.

Appropriate tools and guidance should be used to support decision making. Professionals should use the relevant KSCMP and MSCP safeguarding procedures. Education settings should follow the UK Council for Internet Safety (UKCIS) ‘Sharing

nudes and semi-nudes: advice for education settings working with children and young people' guidance<sup>8</sup>, other agencies may also find this guidance helpful.

<b>Key questions to inform decision making includes:</b>	
<b>What is already known about the child(ren) and young people involved?</b>	<ul style="list-style-type: none"> <li>• What is the age of child(ren) or young people involved?</li> <li>• Is there any previous or current agency involvement?</li> <li>• Are there any additional vulnerabilities, for example special education needs, child in care?</li> <li>• Is there an immediate risk of harm?</li> <li>• Is this a single concern or has any child been involved in multiple incidents?</li> </ul>
<b>How has the imagery been shared?</b>	<ul style="list-style-type: none"> <li>• Did the child or young person send the imagery to more than one person? If so, can the child or young person and/or agency identify those individuals?</li> <li>• Has the imagery been shared beyond its intended recipient(s)? Was it shared without the 'consent' of the child or young person who produced the image?</li> <li>• Has the content been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?</li> </ul>
<b>What do we know about the intent or motivation behind creating or sharing the imagery?</b>	<ul style="list-style-type: none"> <li>• Is there any adult (18+) involvement?</li> <li>• Is the child under the age 13 (12 or under)?</li> <li>• Is the imagery extreme or violent?</li> <li>• Why were the nudes and semi-nudes shared? Was the young person put under pressure or coerced?</li> <li>• Do/can the children and young people involved understand the possible implications of sharing nudes and semi-nudes?</li> </ul>
<b>What is the impact on the child(ren) and/or young people involved?</b>	<ul style="list-style-type: none"> <li>• What is the immediate emotional impact?</li> <li>• Is there any potential long-term impact?</li> <li>• Are there additional concerns if parents or carers are informed?</li> </ul>

<sup>8</sup> [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)



## **5. Multi-agency working**

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An immediate referral to the police and/or local authority children's services should be made if:

- The incident involves an adult (18+) and/or unknown individuals/groups.
- 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 their age or they have special educational needs or disabilities.
- What is known about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The images involve sexual acts and any child in the images or videos is under 13-years-old.
- There is reason to believe a child or young person is at immediate risk of harm, for example, they are presenting as suicidal or self-harming.

The decision to respond to an incident without involving the police or local authority children's services should only be made in cases where the organisations designated safeguarding lead (or equivalent) is confident that they have enough information to fully assess the risk to any child or young person involved, and that those risks can be managed within their local network of support.

The decision about appropriate action to take should be made and recorded by the organisations designated safeguarding lead (or equivalent) in line with the organisation's child protection procedures. Decisions should be based on consideration of the best interests of any child or young person involved, which will include proportionality, as well as child welfare and protection.

The decision should be reviewed throughout the process of responding to the incident and if any doubts remain about the safety of a child or young person after following agency child protection procedures, the KSCMP and MSCP safeguarding procedures should be followed.

## **6. Kent Police involvement**

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If it is necessary to report directly to the police, contact should be made through existing arrangements. This may be through a Schools Officer or dialling 101 or 999 (where there is a threat to life). Once a report is made to the police, it will be recorded and the police will conduct an investigation. This may include seizing devices and interviewing any child or young person involved.

## **7. Local authority children's services**

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If, following an initial review, the agency designated safeguarding lead believes there are wider issues which meet the criteria for local authority children's services involvement,

they should make a referral to the local authority children' service in line with the local safeguarding children partnership procedures.

## **8. Supporting children and young people**

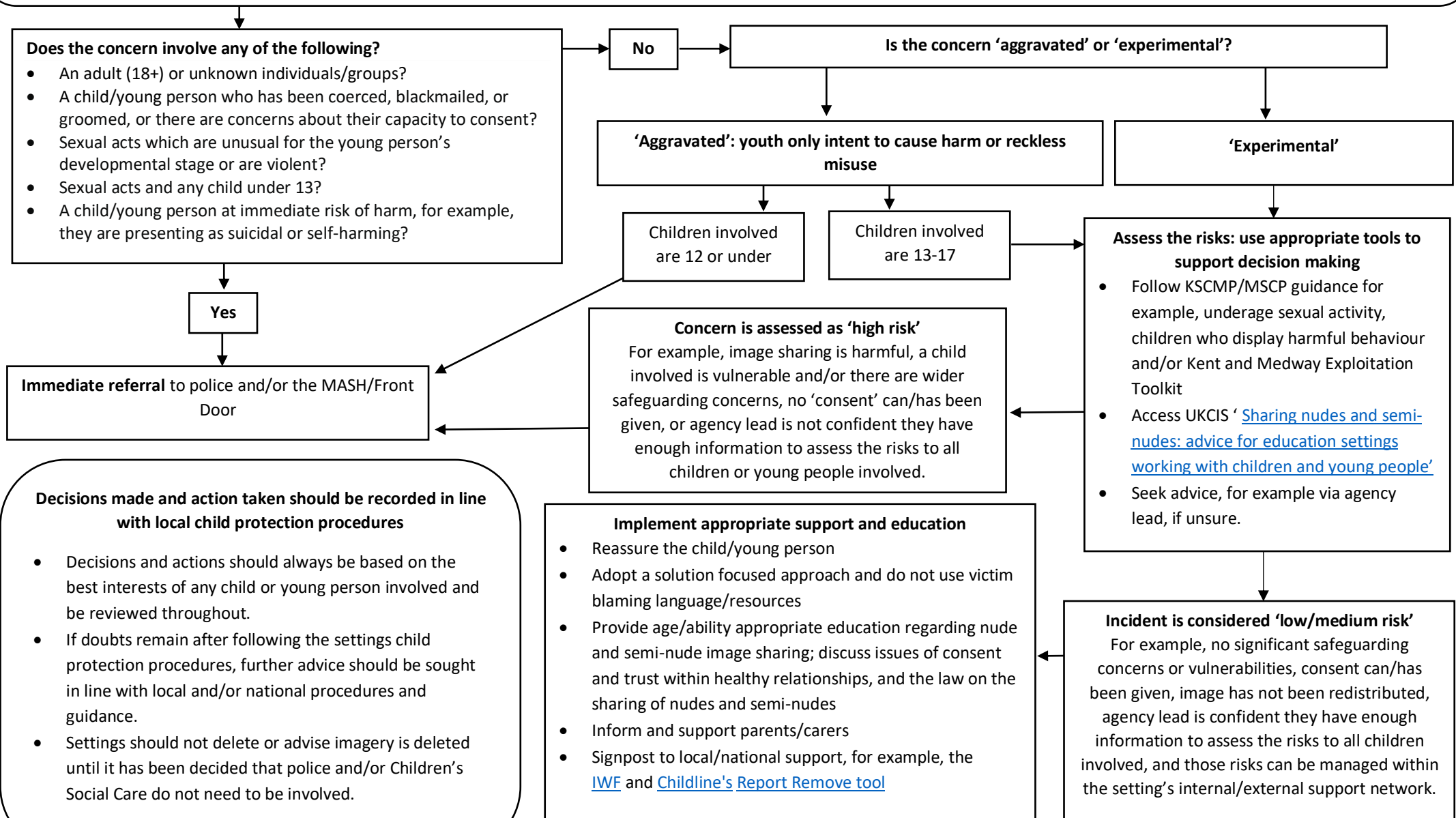
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If an agency has assessed a child or young person as not at immediate risk and that multi-agency input is not required, it will be necessary for the agency to provide appropriate education and support to any children and young people involved. When discussing the sharing of nudes and semi-nudes, it is important that professionals:

- reassure the child or young person that they are not alone, and the service will do everything that they can to help and support them.
- recognise the pressures that children and young people can be under to take part in sharing images and, if relevant, supports parents and carers to understand the wider issues and motivations around this.
- remains solution-focused and avoid using and victim blaming questions or statements.
- helps the child or young person to understand what has happened by discussing the wider pressure that they may face and the motivations of the person that shared of sent on the image(s).
- discuss issues of consent and trust within healthy relationships.
- explain the law on the sharing of nudes and semi-nudes. It is important to highlight that the law is in place to protect children and young people rather than criminalise them and should be explained in such a way that avoids alarming or distressing them.
- signpost to other supporting organisations, for example, the IWF and Childline's Report Remove Tool. The Report Review Tool helps children and young people to report an image shared online, to see if it is possible to get the image removed. This must be done as soon as possible in order to minimise the number of people that have seen the picture.
- discuss what actions and support might be needed, including preventing further distribution of any images. This discussion should consider the views of the child or young person, as well as balancing appropriate actions for responding to the incident.

## Under 18s Nude or Semi-Nude Imagery Concern Identified

- Agency Designated/Named Safeguarding Lead should undertake an initial review to explore the context of the concern. Advice should be sought if safeguarding leads are unsure how to respond.
- If a child/young person is already known to statutory services, safeguarding leads should discuss their concerns with the professional involved, for example a child's social worker.
- In most cases, nude or semi-nude imagery should not be viewed and action should be taken based on what is known about the image. Professionals should not print, forward or share potentially indecent images of children.



## **Appendix One: Responding to children and young people sharing nudes and semi-nudes – advice for professionals**

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This summary provides a brief overview for frontline staff of how to respond to incidents where nudes and semi-nudes have been taken or shared by children and young people.

All incidents should be immediately reported to your agency designated safeguarding lead or equivalent and managed in line with your organisations child protection procedures.

### **What do we mean by sharing nudes and semi-nudes?**

This is defined as the taking/sharing/posting of nude and semi-nude images, videos, or live streams by young people under the age of 18, for example on social media, gaming platforms, chat apps or forums. Many professionals refer to this as youth produced/involved sexual imagery, indecent imagery (the legal term used to define nude or semi-nude images or videos of children and young people under the age of 18), 'sexting' or image-based sexual abuse. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Creating and sharing nudes and semi-nudes of under 18's (including those created and shared with consent) is illegal which makes responding to incidents complex, and it is essential that prompt and appropriate safeguarding action is taken. The motivations for taking and sharing nude and semi-nude images, by children and young people are not always sexually or criminally motivated, so a balanced and proportional safeguarding response is required.

This advice does not apply to adults (over 18s) sharing nudes or semi-nudes of under 18. This is child sexual abuse and must be referred to the police as a matter of urgency.

### **What to do if an incident comes to your attention?**

- Report the incident to your agency designated safeguarding lead or equivalent immediately. Your setting's child protection policy should outline procedures to follow.
- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download it – this is illegal.
- If you have already viewed the imagery by accident (for example, a young person showed it to you before you could ask them not to), report this to your agency designated safeguarding lead (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) involved to disclose information to you regarding the imagery, and do not share information about the incident with young people or their parents/carers. This is the responsibility of your agency designated safeguarding lead (or equivalent).
- Do not say or do anything to blame or shame any young people involved.

- Do explain to them that you need to report it and reassure them that they will receive support and help from your agency designated safeguarding lead (or equivalent).