

Ysgol Bro Preseli



Sexual Harassment Policy

2025-26

CREWYD: 09/24

CREWYD GAN: Awdurdod Lleol

Contents

Introduction	Page 3
What is meant by sexual violence and sexual harassment?	Page 3
What we do in school to educate our children	Page 4
How do we respond?	Page 5
Confidentiality	Page 6
Nudes and Semi-Nudes	Page 6
Risk Assessment	Page 6
Police Involvement	Page 6
Ongoing Considerations	Page 7
Parent/Carer Involvement	Page 8
Safeguarding other children	Page 9
Policy Review	Page 9
Appendix 1 – Nudes and Semi Nudes: Support for young People	
Appendix 2 – Nudes and Semi Nudes: Support for Parents and Carers	

Introduction

Schools have an obligation to deal with sexual harassment along with all other forms of bullying. All pupils are entitled to an education free of sexual harassment and violence and it is not acceptable or tolerated in this school. The school, its leadership team and governing body are committed to ensuring that the working and learning environment is free from sexual violence and harassment and action will be taken against those who breach this policy.

The same applies to teachers – they are entitled to a workplace free from harassment. This school also accepts that it is unlawful for a teacher to sexually harass pupils of any age and will refer any incidents of this nature to both the police and the local authority in line with its safeguarding policy.

Regardless of age, sexual violence and harassment is against the law. Under the Equality Act 2010 it is a criminal offence to cause sexual harassment, alarm or distress by a course of conduct on more than one occasion and conduct can include speech.

Certain types of bullying, about sex or sex-based characteristics, may also be sexual harassment. Anyone aged over 16 years is considered an ‘adult student’, which means they are personally liable if they sexually harass another pupil or teacher. A complaint of sexual harassment cannot be made against another pupil if the harasser is under 16 years. In these circumstances, however, the school still has a duty of care to protect pupils from harassment and discrimination.

Sexual violence and harassment is not behaviour that is based on mutual attraction, friendship or respect. If the interaction is consensual, welcomed and reciprocated it is not sexual harassment. Sexual violence and harassment is a non-consensual act and therefore is considered to be abuse or bullying.

Consent to sexual activity may be given to one sort of sexual activity but not another, or consent may be given with some conditions to the sexual activity. However, consent can be withdrawn at any time during sexual activity and each time activity occurs

What is meant by sexual violence and sexual harassment?

‘Sexual harassment is unwanted behaviour of a sexual nature which: violates your dignity, makes you feel intimidated, degraded or humiliated or creates a hostile or offensive environment. Sexual harassment commonly takes place in public, including workplaces, public spaces and schools. It can be targeted at anyone regardless of gender’.

Sexual violence and sexual harassment can occur between children or young people of any sex. They can also occur through a group of children or young people sexually assaulting or sexually harassing a single child or group of children.

Young peoples’ experiences can range from abusive personal relationships, to harassment, being shown inappropriate pictures on mobile phones, sexual name-

calling or unwanted touching. It is therefore vital that staff are equipped and confident enough to recognise and intervene if they see violence or abuse, or suspect that pupils are experiencing or at risk of such abuse from their families, communities, within their own relationships or peer groups online and offline.

Terms such as 'revenge porn' and 'upskirting' 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. 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.

Victims of sexual violence or sexual harassment will likely find the experience stressful and distressing. This could adversely affect their educational attainment. This school will aim to support these students to access their education and access the correct specialist support, working in partnership with the police and children's services.

What we do in school to educate our children

This school aims to foster a culture in which pupils and staff take sexual violence and harassment seriously. Key topics such as consent, healthy relationships, safeguarding, and domestic violence are covered in our curriculum.

The school will always challenge behaviour or language that seeks to normalise sexual harassment or violence in school. Sanctions can be applied in accordance with our behaviour policy.

The aims of the school are:

- to create a working and learning environment that is free from sexual harassment and where all pupils are treated with courtesy, dignity and respect
- to promote appropriate standards of conduct at all times
- to implement strategies to ensure that all members of the school community know their rights and responsibilities in this area
- to encourage the reporting of sexual harassment
- to provide an effective complaints procedure based on principles of natural justice
- to treat all complaints in a serious, sensitive, fair, timely and confidential manner
- to guarantee against victimisation or reprisals

We deliver a planned programme of evidence-based content through the curriculum and assemblies. Our programme is developed to be age and stage of development appropriate, and tackles such issues as:

- Healthy and respectful relationships, including information on consent;
- What respectful behaviour looks like;
- Gender roles, stereotyping, and equality;

- Body confidence and self-esteem;
- Prejudiced behaviour;
- Non tolerance of sexual violence and sexual harassment
- The law about sexual violence and harassment including social media issues

We also invite external organisations to deliver information sessions to our pupils and parents. We ensure our Designated Safeguarding Person (DSP) has appropriate and regular training and all staff are trained to recognise abuse and harmful sexual behaviours.

How do we respond?

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made and this school will implement its safeguarding process and procedure to ensure all reports of this nature are dealt with seriously and fairly including online sexual harassment. This may include being supported by other agencies, such as Children's Services and the Police as required.

Some situations are statutorily clear:

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape
- Rape, assault by penetration and sexual assault are defined in law
- Creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting, nudes and semi-nudes). This includes children making and sharing sexual images and videos of themselves.

Our safeguarding principle is that if a child has been harmed, is in immediate danger, or is at risk of harm a referral will be made to the Child Care Assessment Team (CCAT). We will usually inform parents that we are making a referral but it may be that a referral is made without parental knowledge in order to safeguard students involved. Advice on this issue will be taken from the CCAT. We will also work closely with the Police if the sexual violence or harassment has been considered to constitute a crime.

We will always reassure victims that they are being taken seriously and that they will be supported and kept safe. As with all safeguarding concerns, our staff are trained to follow the school safeguarding policy and will speak to our Designated Safeguarding Person (DSP). This discussion will be handled sensitively and with the support of Children's Services if required.

In some cases of sexual harassment, e.g. one-off incidents, the report may not meet threshold for statutory intervention and that it would be appropriate to handle the incident internally in school, perhaps through implementing our behaviour and bullying policies and by providing pastoral support. Some families may feel they need some extra support in this circumstance and can be referred or make a self-

referral to the Family Support Team (previously the Team Around the Family (TAF)) for support.

Nudes and Semi Nudes

Keeping learners safe states that everyone working in education ‘has a responsibility to develop children’s understanding, awareness and resilience (of safeguarding) through the curriculum’. In line with this, schools should provide young people with opportunities to learn about the issue of sharing nudes and semi-nudes.

Incidents of online sexual violence and sexual harassment can introduce a number of complex factors. These include the potential for the incident to take place across a number of social media platforms and to move from platform to platform. It also includes the potential for the impact of the incident to extend further than our local community (e.g. for images or content to be shared around neighbouring schools/colleges) and for a victim (or alleged perpetrator) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online.

The school monitor those web searches which may contravene our expectations of appropriate behaviour and should be blocked by our firewall. Where those searches come to our attention as dangerous including sexual violence, the Local Authority may be aware and alert our DSP. In this case, our safeguarding policy will be followed and both the pupil and parents may be contacted in order to ensure all parties are kept safe and issues addressed. However, this firewall is only able to monitor those searches that take place on PCC devices or using the PCC Wi-Fi. Pupils and parents should be aware of the school’s Device / Mobile Phone Policy.

We will act in accordance with our Challenging Bullying, Rights Respect and Equality Policy if we are made aware that our students are using online platforms, which in any way jeopardises the safety of other members of our school community.

Viewing and deleting nudes and semi-nudes

Adults should not view nudes or semi-nudes. Wherever possible responses to incidents should be based on what the DSP has been told about the content of the image. If nudes and semi-nudes have been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring systems) then DSPs should ensure that the staff member is provided with appropriate support. Viewing such images can be distressing for children, young people and adults and appropriate emotional support may be required.

Appropriate information can be found at:
[UKCIS sharing nudes and semi nudes advice for education settings Web accessible .pdf](#)

If the school /DSP has decided that other agencies do not need to be involved and that this is reasonable, then consideration should be given to deleting the images from devices and online services as well as any images being stored on cloud storage

services, in line with the school's Behaviour Policy, to limit any further sharing of the images.

Possession of nudes and semi-nudes of under-18s is illegal. Pupils will be informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved.

These decisions will be recorded, including times, dates and reasons for decisions made, and logged in the safeguarding records. Any statements from the child or young person should be recorded in their own words. Parents or carers should also be informed unless this presents a further risk to the child or young person.

HOWEVER, if it is necessary to view the image(s) in order to safeguard the child or young person the decision to view any imagery will be based on the professional judgement of the DSP (or equivalent) and imagery should never be viewed if the act of viewing will cause significant distress or harm to any child or young person involved. If a decision is made to view imagery, the DSP (or equivalent) would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved
- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent or carer in making a report
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network.

If it is necessary to view the imagery then the DSP (or equivalent) should:

- never copy, print, share, store or save them; this is illegal. If this has already happened, please contact your local police for advice and to explain the circumstances
 - discuss the decision with the headteacher or a member of the senior leadership team
- make sure viewing is undertaken by the DSP (or equivalent) or another member of the safeguarding team with delegated authority from the headteacher or a member of the senior leadership team
- make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the senior leadership team. This staff member does not need to view the images
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the headteacher or a member of the senior leadership team's office
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images
 - record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. Ensure this is signed and dated and meets any appropriate wider standards e.g. such as those set out in statutory safeguarding guidance and local authority policies and procedures
 - if any devices need to be taken and passed onto the police, confiscate the device(s) and call the police. The device should be disconnected from Wi-Fi and data and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, for example in a locked cupboard or safe until the police are able to come and collect it.

The Searching, Screening and **Confiscation advice** for schools highlights how the Education Act 2011 gives schools the power to search pupils for devices, search data on devices. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

Confidentiality

Staff will always maintain confidentiality for both victim and alleged perpetrator as far as it is able and will only share a report of sexual violence or harassment with relevant staff or agencies that are required to provide an appropriate response and support for both the pupil and parents.

There are no definitive answers if a pupil asks the school not to tell anyone about the sexual violence or sexual as there may still be a lawful requirement to share it if the activity has constituted a crime and the schools has a duty to protect children from harm.

If a decision is made to make a referral to Children's Services and/or a report to the Police against the victim's wishes, this will be handled extremely carefully, the reasons will in most cases be explained to the victim and appropriate support offered.

We will also act in accordance with our Bullying Policy when considering the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

Risk Assessment

Following a report of sexual violence, the DSP will undertake a risk assessment taking into consideration any other agency's professional risk assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk assessment should consider the needs of the victim, the alleged perpetrator and any other children (and, if appropriate, staff) at school.

Where there is a criminal investigation into a sexual assault the school will consider removing the perpetrator from any classes they share with the victim and maintain a reasonable distance apart on school premises and on school transport where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator.

As there may be delays in progressing any alleged crime through the criminal justice system, the school will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other children in the school. The risk assessment will help inform any decision. The risk assessment will be recorded (written or electronic) and will be kept under regular review, reflecting any changes in circumstances.

The risk assessment will include consideration of:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions.
- The nature of the alleged incident(s), including whether a crime might have been committed and consideration of harmful sexual behaviour;
- The ages and developmental stages of the pupils involved;
- Any power imbalance between the students (e.g. is the alleged perpetrator significantly older) or ongoing risk
- If the alleged incident is a one off or a sustained pattern of abuse (where this may be known);

Police Involvement

When there is a criminal investigation, early engagement and joined up working between the School, the CCAT and the Police will be critical to support the victim, alleged perpetrator and other pupils involved (especially potentially witnesses). Where required, advice from the Police will be sought to agree what information can be disclosed to staff and others and to help the school manage our safeguarding responsibilities. We will also discuss the best way to protect the victim and their anonymity.

Where conditions have been placed on the alleged perpetrator, the school will work with the CCAT and the police to manage any implications, and safeguard their pupils whilst not undermining the criminal investigation. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.

If a pupil is convicted or receives a caution for a sexual offence, the school will update its risk assessment, ensure relevant protections are in place for all the pupils at the school and, if it has not already, and consider any suitable action in light of our Behaviour Policy.

If the perpetrator remains in school we will be very clear as to our expectations regarding them now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions we think are reasonable and proportionate with regard to the perpetrator's timetable and movement around the school. Our risk assessment will continue to be revised where necessary.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other students in the school. We will do our utmost to ensure that the victim and alleged perpetrator remain protected, especially from any bullying or

harassment (including online). Where necessary we will invoke sanctions from our Behaviour and Bullying Policies.

Where cases are classified as “no further action” (NFA'd) by the Police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. The fact that an allegation cannot be substantiated or does not lead to a conviction or caution does not necessarily indicate innocence or guilt. We will discuss any decisions with the victim and continue to offer support in order for them to access their education. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

Ongoing Considerations

Overall, the priority should be to make the victim's daily experience after a report as normal as possible, so that their school is a safe space for them and will tailor support as required on a case by case basis according to proportionality. The school will consider whether a physical space is required for victims to withdraw and avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups.

It may be necessary for us to maintain arrangements to protect and support the victim for a long time. We will do our best to continue to support this need and will aim to do all we can to reasonably protect the victim from any bullying or harassment because of any report they have made. If the trauma results in the victim being unable remain in the school we will support a move to another school if requested by the victim and parents/carers.

Where a criminal investigation into a sexual assault leads to a conviction or caution, the school will take suitable action including consideration of whether or not the perpetrator should remain in the same school.

The process will have affected both victim and alleged perpetrator and the school is required to provide both the victim and alleged perpetrator with an education. The school must also offer safeguarding support as appropriate whilst implementing any disciplinary sanctions. The alleged perpetrator may also experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them. If the alleged perpetrator is moved to another educational institution (either by request or decision made in best interest), then we will ensure that the new educational institution is made aware of any ongoing support needs.

Parental/Carer Involvement

We understand that parents and carers may well struggle to cope with a report that their child has been the victim of an assault or is alleged to have assaulted another child. The school will consult with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence or harassment.

The exception to this rule is if there is a reason to believe informing a parent/carer will put a child at additional risk in line with our safeguarding policy.

The school will carefully consider what information they provide to the respective parents or carers about the other child involved for safeguarding purposes.

The school will meet the victim's parents/carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.

The school will also meet with the alleged perpetrator's parents/carers to discuss any arrangements that are being put into place that impact the alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions will be explained and support for the alleged perpetrator will be discussed.

Safeguarding other children



The school will consider any support needed for pupils who have witnessed sexual violence. Witnessing such an event is likely to be traumatic and support may be required. We will signpost agencies and support services available where need.

Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides". The school will do all we can to ensure both the victim and alleged perpetrator, and any witnesses, are not being bullied or harassed.

Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator and a very high likelihood that friends from either side could well harass the victim or alleged perpetrator online. Any evidence we obtain of students using social media inappropriately will be sanctioned according to our Behaviour and Challenging Bullying Policies.

Policy Review

This policy will be reviewed and ratified three yearly at a full governing body meeting and recorded in the minutes.

	Name	Signature	Date
Originator	Rhonwen Morris		04/09/24
Originator	Carwyn James		04/09/24

Review Date	04/09/27
-------------	----------

Appendix 1 – Nudes and Semi Nudes – support for young people

Helplines and reporting

Children can talk to a Childline counsellor 24 hours a day about anything that is worrying them by ringing 0800 11 11 or in an [online chat](#).

- [Meic](#) is the national advocacy, information and advice helpline for children and young people in Wales aged 0 to 25 - the free and confidential service is available by phone (080880 23456), text (84001), or online chat.

Children and young people can also use [Take It Down](#), a similar service to Report Remove, but with a few differences. Report Remove is a confidential rather than anonymous service in that Childline can provide advice and support should the young person want that, but do not hold the imagery.

The image is received by the IWF who will never know the name or contact details of the young person, but work to assess the image against UK law, and create a hash to give to industry. Take It Down is anonymous and is a tool provided by the National Center for Missing and Exploited Children (an American child protection organisation), to help with removing nudes or semi-nudes that young people believe have been or could be shared online. The website has published [participating online platforms](#) who have agreed to use the Take It Down hash list to scan for images and videos on their public and unencrypted platforms. By selecting the nude or semi-nude on a device, the tool will generate a 'hash' or digital fingerprint that can be used by online platforms such as Snapchat, TikTok and Instagram to identify exact copies of those images or videos. The service can be used even if the child or young person is unsure whether an image has been shared.

'So You Got Naked Online' by South West Grid for Learning;

[so-you-got-naked-online.pdf \(swgfl.org.uk\)](#)

Appendix 2 – Nudes and Semi-Nudes – Support for Parents and Carers

Supporting parents and carers

Children and young people can be involved in sharing nudes and semi-nudes in several different ways. They may lose control of their own image, receive an image of someone else or share an image of another person. In any of these situations, parents and carers may find it difficult to know how to deal with the knowledge that their child has been involved in an incident and may display differing emotions.

Whatever their feelings, it is important that professionals listen to their concerns and take them seriously. It can also be helpful for staff members and the police or social care to reassure parents and carers by explaining that it is normal for young people to be curious about sex.

In all situations, parents and carers should be:

- given support to deal with their own feelings of upset and concern, including signposting to further resources that can help them to understand the sharing of nude and semi-nude incidents or support services they can contact, where appropriate
- given support on how to speak to their child about the incident
- advised on the law around sharing nudes and semi-nudes
- kept updated about any actions that have been taken or any support that their child is accessing unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision
- informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened (this could include speaking to a [Childline](#) counsellor, in-house counselling services where available, or a GP). If they are concerned that their child is suicidal they should contact 999
- advised to talk to the setting about any incidents of bullying linked to the situation in line with the anti-bullying policy
- directed to [NCA-CEOP](#) if the child or young person discloses any further details to them that may suggest they are being groomed or sexually exploited

In addition to the advice above, parents and carers should be given the following advice and guidance for specific scenarios.

Parents and carers whose child has lost control of nudes and semi-nudes should be:

- directed to encourage the child or young person to delete images from social media accounts if they have uploaded the images themselves
- directed to IWF and Childline's [Report Remove tool](#) as soon as possible to minimise the number of people that see the image.

Parents and carers whose child has been sent nudes and semi-nudes should be advised to:

- listen to their child's concerns without criticising their decisions
- consider ways that their child could speak to the sender to stop future correspondences (or alternatively, if the child or young person prefers, informed about how to block the sender)
- discuss issues of consent and trust within healthy relationships and that it is not okay for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about, and that they can speak out if this ever happens

Parents and carers whose child has created or shared another child's image should be advised to:

- stay calm and refrain from getting angry with their child
- ask who the image has been sent to and where it has been shared
- agree next steps for taking the image down, including deleting the image from their phone or any social media accounts and reporting it to service providers
- identify whether they asked for the image or were initially sent it without requesting it
- discuss issues of consent and trust in healthy relationships or friendships
- talk about the types of things that are and are not okay to share and how they would feel if someone shared a personal photo of them (if they have asked for the image, explain the importance of not pressuring others into activities that they may not want to take part in)
- ask about their motivations for sharing the photo and discuss what they could have done differently (if they have reacted to an upsetting incident, such as the break-up of a relationship, by sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way)
- inform the setting if they are concerned that their child is behaving in a sexually inappropriate way, and directed to contact their GP or social services for advice about getting early help and support for the child from appropriate services. They could also be directed to services for harmful sexual behaviour, such as the National Clinical Assessment and Treatment Service or [Shore](#), if appropriate, or if similar incidents have previously occurred

Helplines and reporting

- Children can talk to a Childline counsellor 24 hours a day about anything that is worrying them by ringing 0800 11 11 or in an [online chat](#).
- If parents or carers are concerned that their child is being contacted by adults as a result of having shared sexual imagery they should report to [NCA-CEOP](#).
- If parents or carers are concerned about their child, they can contact the NSPCC Cymru Helpline by ringing 0808 800 5000 or emailing help@nspcc.org.uk.
- Llinell Gymorth Byw Heb Ofn/Live Fear Free Helpline 0808 8010 800 – a 24-hour helpline for people who have experienced or are experiencing domestic abuse or sexual violence, or who are worried about a friend or relative.
- [Live Fear Free website](#) offers advice on domestic abuse, sexual violence and violence against women.
- [Stop it Now!](#) UK and Ireland Helpline (0808 1000 900) for advice on protecting a child or if you are concerned about their sexual behaviour.