



ONLINE SEXUAL HARASSMENT:

COMPREHENSIVE GUIDANCE FOR SCHOOLS

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This document complies with or has regards to the following:

- [Keeping children safe in education](#) (Department for Education, 2019)
- [Searching, screening and confiscation](#) (Department for Education, 2018)
- [Sexting in Schools and Colleges](#) (UKCCIS, 2017)
- [Sexual violence and sexual harassment between children in schools and colleges](#) (Department for Education, 2018)
- [Cyberbullying: advice for headteachers and school staff](#) (Department for Education, 2014)
- [Mental Health and Behaviour in Schools](#) (Department for Education, 2018)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#) (Department for Education, 2019)
- [Information Sharing Guidance](#) (Department for Education, 2018)
- [Working Together to Safeguard Children](#) (Department for Education, 2018)
- [What to do if you're worried a child is being abused](#) (HM Government, 2015)

This should be read alongside and integrated within school policies such as:

- Anti-bullying policy
- Cyberbullying policy
- E-safety policy
- IT - pupil acceptable use policy
- Mobile computing device policy
- Safeguarding and child protection policy

Please refer to the following related documents for additional support:

- Online Sexual Harassment: Guidance for Senior Leaders
- Online Sexual Harassment: Guidance for Students

WHAT IS ONLINE SEXUAL HARASSMENT?

Online sexual harassment refers to a range of behaviours where digital technologies are used to facilitate both virtual and face-to-face sexually based harms. Online sexual harassment may constitute a number of criminal offences, depending on the nature of the online harassment. Whether the conduct constitutes a criminal offence or not, many victim-survivors experience these behaviours as a form of sexual violence. Throughout this guidance, we recognise and address the gendered nature of harms linked to online sexual harassment.

Examples of online sexual harassment can be broadly split into the following areas:

1. **Unsolicited sexual content online** refers to any sexual content shared online which is not wanted by the recipient. This could include content seen on apps, messaging services and websites which has not been sought out by the user.
2. **Image-based sexual abuse** refers to the non-consensual creation and/or distribution of sexual images.
3. **Sexual coercion, threats and intimidation online** could include a person receiving threats of a sexual nature or being coerced to engage in sexual behaviours on or offline via digital technologies.

While we make distinctions between these three categories for the sake of clarity, there are evident overlaps and links.

Examples of unsolicited sexual content:

- Unsolicited sexual images (e.g. someone sending an unsolicited image of their penis to someone else, often referred to as a 'dick pic')
- Unsolicited sexual videos
- Unsolicited sexual messages and comments
- Deliberately being shown pornography or sent links to pornographic content without consent
- Automated activities sending links to online pornography content (porn bots)

Examples of image-based sexual abuse:

- Consensually taken images that have been consensually shared with one recipient then distributed by the recipient non-consensually (often referred to as 'revenge porn')
- Consensually taken images that have been hacked or stolen and then shared
- The recording and/or sharing of rape or sexual assaults
- The non-consensual creation of sexual images (e.g. upskirting which is the taking of a photo up a person's skirt without their consent)

Examples of sexual coercion, threats and intimidation online:

- Threats to share images non-consensually (commonly part of a pattern of coercive behaviour in abusive relationships).
- Sextortion: the practice whereby perpetrators (often strangers) typically coerce vulnerable individuals or groups of victims into creating and sharing images or performing sexual acts, then threaten the victim with blackmail and exposure. Other times, the perpetrator hacks into people's social media profiles and, on finding intimate images, threatens to share them.
- Homophobia or transphobia online, including 'outing' or threatening to out someone. This is where someone discloses a person's sexuality or gender identity without their consent.

UNDERSTANDING UNSOLICITED SEXUAL CONTENT ONLINE

Unsolicited sexual content online refers to any sexual content shared online which is not wanted by the recipient. See 'Online Sexual Harassment: Guidance for Students' for more information and advice for what to do if you experience this.

PORN BOTS

Porn bots are automated activities sending links to online porn content. This could be via group chats, DMs or comments (like the example below, from Ringrose et al. 2020) on social media apps or online gaming.

How to spot a bot?

- Often new users
- Low following
- Send random sexual messages
- Sexual profile picture

What to do?

Bot accounts mainly exist to make money through clicks on the links they send, so avoid clicking on these links and ignore any communication from bots.



STRANGERS OR PEERS

Young people, particularly girls, report receiving unsolicited dick pics and masturbation videos via apps like Snapchat and Instagram, from peers and also strangers.

Regardless of someone's age and someone's relationship to them, this is sexual harassment and is unacceptable.

The image on the right was drawn by a pupil during a research project, as an example of one of the unwanted sexual images they had received online (Ringrose et al. 2020; full article here: bit.ly/3dntxNT).



Can sending sexual images online ever be OK?

As well as the law around child sexual abuse material, the key issue with the image sending described here is that it's unwanted! In an ethical image-sending interaction, someone would seek enthusiastic consent before sending an image; they'd check again even if the person had consented in the past; and they'd know that just because the other person consented to receiving an image, it wouldn't mean they necessarily wanted to send one back!



UNDERSTANDING IMAGE-BASED SEXUAL ABUSE

'Image-based sexual abuse' refers to the non-consensual creation and/or distribution of sexual images. This could include images of a sexual nature shared without the consent of the person in the photo. Sharing sexual images must be approached and taught within a framework of ethics, rights and consent.

POSSIBLE STEPS IN NUDE SENDING

Person A and B discuss sending nudes - either mutually or one to the other.



One person takes a nude and sends it to the other, or they exchange nudes.

UNDER A CONSENT, RIGHTS AND ETHICS APPROACH...

Neither person threatens, coerces or pressures the other to send nudes. Both feel comfortable to say if they're not up for it. If one person isn't up for it, the other person spots that and is completely respectful of that.

The people involved may agree certain privacy rules around the nudes, so that there's informed consent. Both then act with integrity by sticking to this agreement, and don't break the other person's trust.

IMAGE-BASED ABUSE OCCURS WHEN...

The person who has received the other person's nudes breaks their trust and violates their privacy and dignity by sharing their nudes without consent. This is abuse, and it is never the fault of the person who sent the photo.



UNDERSTANDING SEXUAL COERCION, THREATS OR INTIMIDATION ONLINE

Sexual coercion, threats or intimidation online covers a range of digitally facilitated behaviours. Below we've explained a couple examples in more detail. See 'Online Sexual Harassment: Guidance for Students' for more information and advice about what to do if you experience this.

SEXTORTION



A perpetrator coerces a vulnerable individual or groups of victims into creating and sharing images or performing sexual acts.



Other times, the perpetrator hacks into people's social media profiles.



The perpetrator then threatens the victim with blackmail and exposure.

SEXUAL THREATS



E.g. outing (disclosing without consent) or threatening to out someone's gender or sexuality online.



Or, threatening sexual violence, e.g. threats of offline sexual violence, or threatening to share someone's intimate images.

DID YOU KNOW?

A 2019 study found that girls who spoke out about feminism & social justice online experienced high rates of online abuse, including misogynistic comments and even death threats (Mendes, Ringrose & Keller, 2019).



DIGITAL CONSENT

Consent online should be taught and understood in the same way as sexual consent offline. This includes that:

- We are personally responsible for getting consent - it's not the other person's responsibility to give consent;
- Consent is freely given: if someone is pestered, peer pressured, coerced or threatened into doing something, that is not consensual;
- Consent is enthusiastic, wholehearted, definite, 100%;
- Consent is specific, so that someone can give informed consent to a particular sexual activity;
- Consent is ongoing: any type of sexual activity, including online, should be good and fun for everyone involved. It's our job to keep checking-in with any sexual partners to ensure they are having a good time. And just because someone consented to an online sexual interaction before, it doesn't mean they want to again - we must keep checking for consent.

ONLINE SEXUAL HARASSMENT: FRAMING AND LANGUAGE

Terminology is vital and there needs to be a shift in the language used to discuss online sexual harassment with young people. Although the term **revenge porn** has wide currency in popular culture, it is an inadequate and problematic term. The sharing of sexual images without consent is not necessarily always about 'revenge' and the use of the term 'revenge' suggests that victims of revenge porn are somehow responsible for their victimisation. Further, the use of the term 'porn' is problematic because it has salacious connotations that can blind people to the nature of the crime and its harm to victims. The focus always needs to be on **consent** and not intent. To blame the victim for sharing nudes that are then shared without consent is akin to blaming rape victims for what they were wearing at the time of their assault. It is therefore important to reframe so-called revenge porn as **image-based sexual abuse** (1).

*Young people tend to use the word **nudes** to describe the consensual sharing of intimate sexual images. Advising young people to stop using social media or to stop sharing nudes consensually **should not be the standard advice**. Research has shown that abstinence-based approaches such as advising young people to refrain from using social media feeds are not only ineffectual, they also feed into victim-blaming discourse and can have damaging emotional consequences (2). Instead, young people's digital and sexual rights should be prioritised through an emphasis on teaching about **consent, respect and human rights in the digital sphere**.*

A shift towards a consent-oriented education about the different forms of online sexual harassment is the appropriate and ethical alternative to abstinence-based approaches which do not work (3).

WHO IS AT RISK OF ONLINE SEXUAL HARASSMENT?

Online sexual harassment is not a gender-neutral practice; rather, these digital harms can be seen as an extension of broader gender and sexual inequities (4). As McGlynn and Rackley explain, *'the harms [of image based sexual abuse]...are deeply gendered. Not only are victims mostly women and girls, but the abuse and harassment to which they are subjected is sexualised and misogynistic. The persistence of sexual double standards enables offenders to shame and humiliate victims - with families, friends, employers and strangers commonly blaming victims'* (1). More broadly, gendered and sexualized cyberbullying is disproportionately experienced by girls and LGBTQIA¹ children and youth (5).

Boys, meanwhile, may be at risk of peer exclusion if they do not take part in or speak about sexual activities and practices (4). Recent focus group research we conducted revealed the prevalence of boy to boy peer pressure to take part in sexualized image trading. This included the pressure to send penis/genitalia photos ('dick pics') which is classed as a form of unsolicited sexual content if the recipient had not consented to receiving the images.

A recent YouGov poll reveals the growing practice of sending unsolicited 'dick pics' (a form of digital flashing). The survey showed that close to half of female millennials (46%) say they have received a penis photo. Of those women, nine in ten (89%) have received one without having asked for it. The survey found this is happening amongst under 18s and increasingly so, with almost half (46%) of millennial women who have received a penis photo being younger than 18 the first time it happened. This figure rises to 71% of 18-24 year olds. Likewise, 30% of millennial men who have sent one did so while they were below the legal age, increasing to 44% among 18-24 year olds (6).

¹: Lesbian, Gay, Bisexual, Transgender, Queer, Questioning, Intersex, Asexual/Aromantic and other groups of people whose sexuality and/or gender fall outside of perceived or assumed societal norms.

EVIDENCE BASE

This document draws on information from interviews with seven safeguarding leads in UK secondary schools and interviews with students aged 13-18. The research was conducted between January-June 2020.

Young People

- Receiving unsolicited sexual images from unknown and known users on social media platforms is the norm for young people – this disproportionately impacts young girls specifically
- Young people who use social media apps almost ubiquitously receive messages from porn bots on platforms such as Instagram and PlayStation
- Young people feel they cannot go to teachers if they experience image-based sexual abuse because they fear it will make the situation worse
- Young people sympathise with victims of image-based sexual abuse but simultaneously perpetuate ideas that it is the fault of the person in the image rather than the person who non-consensually shared the image
- Whilst young people are for the most part excellent at self-educating around the functions including privacy settings of digital technologies, there were gaps in knowledge relating to reporting online sexual harassment
- Young people's risk of experiencing online sexual harassment was exacerbated by gender, class, sexuality, race and other inequalities.

Teachers

1. Amongst teachers, there is a lack of understanding around what constitutes image-based sexual abuse – this is in part because of a lack of conceptual distinction between crimes related to underage sexual images and crimes related to non-consensual image sharing
2. A focus on abstinence-based digital sex and relationships education continues to pervade curriculum and discussion around these topics even though abstinence-based sex education has been proven to be ineffective and counterproductive (3)
3. Some teachers and safeguarding leads recognise that young victims are criminalised as child sexual abuse material/images laws are being applied to youth-generated sexual images in cases where images were taken, sent and received consensually. Many would like to see changes to law and policy in order to address this
4. Teachers would like curriculum guidance on how to educate young people about online sexual harassment and specifically image-based sexual abuse
5. Teachers would like advice on how to work with parents on these issues.

NEXT STEPS

In response to these findings, we have designed a guidance document and supplementary documents which detail the laws relevant to these issues and provide recommendations for school staff in terms of pastoral care, whole school approach and curriculum content.

We suggest:

1. All schools embed relevant aspects of this guidance across all other school policies as part of a whole-school policy review
2. All schools provide comprehensive and purposeful staff training to ensure all members of school staff are aware of these issues and the appropriate ways in which to respond to them
3. All schools develop and deliver RSE curriculum content which is oriented around rights, ethics and consent and recognises the gendered nature of these issues.

PRIMARY SCHOOLS

Whilst the evidence base for this guidance is largely from secondary schools, issues of online sexual harassment can also occur in primary schools, and there is substantial overlap in terms of approaches to tackle these issues.

WHAT'S THE IMPACT OF ONLINE SEXUAL HARASSMENT?

The experience of online sexual harassment will of course be different for all young people. It is important to recognise that it can have both short- and long-term consequences for victims which will appear differently for each individual, impacting mental health and wellbeing.

What's the impact of unsolicited sexual content for young people?

- Severe mental distress - feeling threatened, intimidated and violated
- Violates dignity and autonomy of victims - it removes the right to control what we see and engage with online
- Leads to older siblings (who are still children) monitoring the content on younger siblings' social media platform to remove any unsolicited content. This puts additional pressure on older siblings to keep younger siblings safe
- Normalisation of non-consensual sexual activity and intimidation.

What's the impact of image-based sexual abuse (IBSA) for young people?

- Severe mental distress - feeling threatened, violated and anxious regarding repercussions including fearing direct physical attacks, to name but a few
- Violates dignity and privacy of victims - it removes right to control who we share intimate images with
- Impacts on feelings of self-worth and self-esteem levels: IBSA can relate strongly to issues of body image and self-esteem
- Takes away right to freedom of sexual expression - feelings of shame from culture of blaming victim for their own abuse
- Normalisation of non-consensual sexual activity and sexual violence
- Social stigma can negatively impact peer relationships leading to risk of isolation
- School refusal if issues of social stigma begin to prevent a young person from feeling comfortable in the school setting
- Victims fear chance of employment and other opportunities will be put at risk if images are put online or if there is police involvement

What's the impact of sexual coercion, threats and intimidation for young people?

- Severe mental distress - feeling threatened, violated and anxious regarding repercussions including fearing direct physical attacks, to name but a few
- Violates dignity and privacy of victims - it removes right to control what we do online
- Impacts on feelings of self-worth and self-esteem levels: threatening IBSA can relate strongly to issues of body image and self-esteem

- Normalisation of non-consensual sexual activity and sexual violence
- Victim's fear chance of employment and other opportunities will be put at risk if employers or potential employers find images and police involvement

TEACHER RESPONSES

Please see 'recommendations for staff' for further suggestions on how to support young people experiencing online sexual harassment.

THE LAWS RELEVANT TO ONLINE SEXUAL HARASSMENT IN ENGLAND*

*These laws also apply in Wales but are different in Scotland and Northern Ireland so a blanket explanation for practices across the United Kingdom is not possible.

Here we provide a lay summary of the laws relevant to the subcategories of online sexual harassment which we have identified as prevalent amongst young people: unsolicited sexual content, image-based sexual abuse and sexual coercion, threats and intimidation online.

It is important to caveat here that these laws were designed prior to the use of digital technologies for online sexual harassment such as unsolicited content sharing and image-based sexual abuse. The laws applied to instances of image-based sexual abuse were, in large part, designed to prevent child sexual abuse material/images from being created and distributed on the internet. As such, they do not recognise the nuances of consensual youth-generated sexual images which, after creation, can be non-consensually shared. In response, we advocate for a consent, rights and ethics-oriented approach to online sexual harassment issues and IBSA specifically in schools. The laws to some extent underpin this approach but there are gaps because of the nature of their origin, resulting in certain problematic behaviours going unprosecuted, while other seemingly innocuous acts are deemed criminal. Consequently, while a knowledge of the law is important, we advocate for school and curriculum approaches which recognise the law's gaps and adopt a nuanced approach which, as stated, is consent, rights and ethics-oriented.

Unsolicited sexual content online

- There are a number of laws in which a person could be prosecuted for sending unsolicited sexual content online, however, the act in and of itself is not yet illegal in England and Wales (though it is in Scotland).
- Laws which could be applied to this include the Protection from Harassment Act 1997 and some aspects of the Sexual Offences Act 2003 such as 'causing a child to watch a sex act' and 'sexual communication with a child'.
- The Law Commission is currently conducting a review on laws relevant to this area and will release findings in 2021.

Image-Based Sexual Abuse

- As of 2015, it is 'an offence for a person to disclose a private sexual photograph or film if the disclosure is made without the consent of an individual who appears in the photograph or film, and with the intention of causing that individual distress'.
- In April 2017, the Sentencing Council included the 'threat to disclose intimate material or sexually explicit images', within its guideline for offences under the Communications Act 2003 (7); however, prosecuting threats of image-based sexual abuse remains challenging.

- Under the Protection of Children Act 1978, creating or sharing indecent images of a child is illegal. It is illegal if the person creating the image is under the age of 18, even if they consent to it being created, or share it with children of the same age.
- In January 2016, the Home Office launched 'Outcome 21' a new outcome in the Home Office Recording Rules. This allows police to respond in a proportionate way to reports of youth produced sexual imagery. This states that even though a young person has broken the law and the police may have evidence that they have done so, the police can record that they chose not to take further action as it was not in the public interest
- Since April 2019, it has been an offence to take an image or video up a person's skirt without their consent, often referred to as 'upskirting'.

Sexual coercion, threats and intimidation online

- Several sections of the Sexual Offences Act 2003 could be relevant in instances of sexual coercion, threats and intimidation including 'causing or inciting a child to engage in sexual activity'
- In situations of demands for sexual images where threats are made, Section 21 of the Theft Act 1968 (Blackmail) is likely to apply
- All kinds of persistent harassment and stalking are offences under the Protection from Harassment Act 1997. What constitutes harassment or stalking is not explicitly defined, but can include a range of actions when considering the context, nature, and duration of the acts.

RECOMMENDATIONS

A whole school, joined-up approach is needed to tackle online sexual harassment amongst young people and to support victims.

This should include dedicated PSHE and RSE sessions, themes and assemblies via well-trained and well-informed staff. All staff should have a baseline understanding of what constitutes online sexual harassment, recommended responses and curriculum approaches. Schools should ensure that policies and curriculum support a message of equality and a zero-tolerance stance on (online) sexual harassment and violence for children and young people of all genders and sexualities. It should also recognise that, while it is possible for all young people to experience these issues, these practices are highly gendered.

RECOMMENDATIONS FOR SUPPORTING POLICIES

- **Online Safety policies:** need to have gender-sensitive guidelines for online engagement including foregrounding the always changing legal context around under-age sexual content and consent, which are often unknown to young people.
- **School safety policies:** must prioritise new pressures around digital intimacy for young people including social media use and pornography, including onsite and offsite activities.
- **Bullying and cyberbullying policies:** should be connected to wider safety and health initiatives that tackle gender and sexism. Online sexual harassment can relate strongly to issues of body image and self-esteem.
- **Curriculum and extracurricular activities and policies:** ensure these do not reproduce the gender binary i.e. the classification of gender into only two distinct groups, typically man and woman, without acknowledging the existence of other genders, such as non-binary or gender fluid. These policies should not reinforce sexual double standards (boys and girls being judged differently for the same sexual behaviours), and sexism and homophobia must be tackled head-on through a whole school approach. Core issues to be addressed include providing gender neutral uniforms and toilets, having a stringent policy on protected characteristics, including sexual harassment and homophobia.
- **School uniform policies:** contradictory school policies, such as dress codes that shame girls (e.g. with specific skirt length rules) and protection policies that discourage girls from openly discussing sexual experiences, are reproducing rather than challenging sexism and sexual harassment in schools and need to be changed.

KEY CONSIDERATIONS FOR SUPPORTING PSHE, RSE AND WIDER CURRICULUM

GENDERED HARM

As per the 2019 Relationships and Sex Education statutory guidance, an understanding of gender and sexual inequity is essential to help young people understand and challenge online sexual harassment. Addressing the following through PSHE and RSE can help students to unpick normalised harmful attitudes and behaviours:

- The various sexual and social pressures faced by young people and how these are shaped by gender, race, ability, religious belief, culture, social norms, sexuality and class.
- An intersectional ², local and global understanding of power relations around girls and women's bodies, both online and offline, in public and private.
- Sexual double standards, i.e. slut-shaming ³ and victim-blaming as a response to image-based sexual abuse.
- How phenomena such as 'slut-shaming' and 'gay-bashing' stem from the same norms of performing idealised masculinity (strong and sexually dominant and heteronormative) and femininity (passive and virginal) (9).
- How boys, in an effort to be 'manly' might be more likely to feel pressured to non-consensually share sexual images of another young person.
- Critical considerations of power, inequity and gendered harms should not be confined to RSE or PSHE more broadly. Schools should adopt a cross-curriculum approach e.g. by using a diverse range of identities and experiences in English texts and discussing power in relation to gender, race, class, etc. in other subjects where relevant.
- Heteronormativity, i.e. the assumption or suggestion that all sex and relationships are between a cis⁴ man and cis woman. Schools should ensure that RSE in particular avoids heteronormative assumptions, for example, inadvertently suggesting that all students will have penis-in-vagina sex when discussing contraception. This could lead students who are gay, lesbian or asexual to think of their sexuality as 'abnormal' or 'wrong'. It can also mislead students into thinking that they do not need to consider their sexual health when engaging in other types of sex.

² An intersectional approach is one that takes into consideration how social categories such as race, class, and gender overlap and intersect, determining the kinds of discrimination and disadvantages people experience.

³ To slut shame someone (typically a girl or woman and sometimes also gay men) is to criticise and judge them for sexual behaviour. In the context of IBSA, it is to suggest, for example, that a girl or a woman should not have shared a nude in the first place.

⁴ Cisgender, or cis, describes someone who identifies with the gender they were assigned at birth.

DIGITAL DEFENCE

Digital defence is a term used to describe a facet of digital literacy which educates young people on how to navigate online platforms and digital devices safely and effectively. It can include aspects of digital literacy related to privacy settings, reporting and blocking other users, identifying and addressing issues of online sexual harassment and recognising misinformation.

As is now commonly good practice in most schools as part of digital defence, students understand about:

- **Using technology** including learning how to use and manage social media apps and web platforms. This includes supporting the creation of youth-led change-making and awareness raising resources⁵ and providing resources and commitment to youth led gender activism including girls' rights and LGBTQ+ rights (10).
- **Online privacy** (data protection) including how to use privacy settings on their most-used platforms (e.g. Instagram, Snapchat, Tiktok), and knowing how to identify fake profiles.
- **Digital defence strategies**, such as reporting, blocking and being aware of the Internet Watch foundation, CEOP and Report Harmful Content (links below).
- **Being a bystander**: providing young people with an understanding of what they could do if they witnessed someone being harassed or bullied.⁶

It is also essential to support students to understand all forms of online sexual harassment within the context of:

- **Consent** - the idea of it being our responsibility to get consent, the need for freely given, enthusiastic consent which can be withdrawn at any time, and that sexual touch should be good and fun for everyone involved.
- **Respectful relationships** - that digital interactions must also uphold the staples of healthy relationships, including honesty, trust, empathy and equality. For instance, that sharing a nude of someone without their consent would be a very clear breach of trust, lack of respect, and not a healthy relationship. Students should understand that these notions of consent and respectful relationships apply to all types of relationships - friendships and family relationships as much as intimate relationships.
- **Human rights** – the idea that all individuals have a right to fairness and to having their privacy respected.

⁵ See AGENDA, a resource for educational practitioners who want to support children and young people to make positive relationships matter in their school and community: www.agendaonline.co.uk

⁶ See Hollaback! Bystander Resources page: <https://www.ihollaback.org/bystander-resources/>

RECOMMENDATIONS FOR STAFF: EXPECTATIONS AND DEALING WITH INCIDENTS

Please refer to *Sexting in Schools and Colleges* for more information including viewing youth-produced images and safeguarding.

1. Staff are required to be familiar with the definitions and examples of online sexual harassment outlined in this guidance, and to support the school in its efforts to eliminate all kinds of sexual violence and abuse. They are also required to report any suspicions about any form of online sexual harassment or potential instances of it.
2. It is especially important that Designated Safeguarding Leads are made aware of every case of potential online sexual harassment, so that all concerns can be appropriately logged and form part of a broader overview and activated as necessary.
3. All members of staff are required to inform the Designated Safeguarding Leads (or the police, or local authority, if appropriate) immediately of any instances of online sexual harassment, or anything which could potentially amount to abuse as defined in the School's Safeguarding and Child Protection Policy. In such cases, staff should not try to investigate or make a judgement, but simply pass on their concerns quickly and clearly, as detailed in that document.
4. Staff should be aware that the police require to be informed of any incident which might constitute a hate crime, here meaning any message, image or film which appears to be motivated by hostility or prejudice based on a person's race or perceived race; religion or perceived religion; sexual orientation or perceived sexual orientation; disability or perceived disability; and any crime motivated by hostility or prejudice against a person who is transgender or perceived to be transgender.
5. The School will always follow the advice of the police or children social care local authority. When the School is dealing with instances of online sexual harassment internally, it will provide support for the victim which, in the case of IBSA, will include directing them to sources which can support the removal of the offending material, and (if necessary) contacting service providers. The School may seek general (not pupil-specific) advice from the UK Safer Internet Centre professionals' online safety helpline.
6. Staff should be aware that "just turn it off!" is rarely helpful advice to offer a young person. Staff should be able to offer pupils guidance on who to contact if they believe they are experiencing online sexual harassment of any form, especially during school holidays.
7. If or when the subject of sexual violence or gender and sexual inequality arise, staff should communicate to the students that these are serious problems and not undermine the impact and consequences of these issues and not put the child at further risk.
8. The school, through the safeguarding and pastoral structures, should liaise with all parents to outline approaches to online sexual harassment and rationale for those approaches so that parents feel equipped and supported enough to work with school staff if issues arise with their own children.
9. All members of staff should be familiar with appropriate language and gendered harm as outlined in 'Key considerations for supporting PSHE and wider curriculum'.
10. Staff should reflect on their own value judgements and be mindful that their own life experiences may be different from their students. This allows time to consider how certain internal biases might play out when discussing these topics in class, which in turn helps facilitate teaching which is inclusive and respectful of all children.

RECOMMENDATIONS FOR PUPILS

If you experience any form of online sexual harassment:

- Firstly, know **it is not your fault and you are not in trouble**
- If possible, speak to an adult or friend that you trust and/or see other helplines and support services below (these explain how to stop someone from contacting you, or how to get images of yourself removed)

To help tackle online sexual harassment:

- If anyone tries to show you a nude of someone else, remember that you don't have to look at it or share it with others
- If someone is harassing another person online, don't join in with the harassment, or like offensive comments or posts
- Don't slut-shame or victim-blame someone who experiences online sexual harassment - tell them it's not their fault
- If you can, and it is safe for you and the victim, call out people who are harassing others online. Tell them that what they are doing is harassment, and it's not okay.
- Remember, it's **your body and your rules**.

If you decide to tell someone at school that you've experienced online sexual harassment:

- You can request that staff do not see the image, film or message
- Staff will always follow safeguarding procedures designed to protect your safety and right to privacy
- You have the right to an input over how incidents of online sexual harassment are managed if you are the victim
- Even if an incident takes place outside of school a pupil who commits online sexual harassment could still face consequences in school.

HOW TO REPORT

REPORTING UNSOLICITED SEXUAL CONTENT

- Offline:** Creating a culture of reporting is essential to tackling the normalisation of online sexual harassment. Students should be encouraged to report any abusive behaviour to someone they trust, rather than feel they have to suffer in silence. They could report to a parent, carer or a member of school staff. These individuals should be provided with the necessary information to know where they can go to find resources to support the young person.
- Online:** See 'reporting to online support organisations and social media platforms' below.

REPORTING IMAGE-BASED SEXUAL ABUSE

- Offline:** Creating a culture of reporting is essential to tackling the normalisation of image-based sexual abuse. Students should be encouraged to report any abusive behaviour to someone they trust, rather than feel they have to suffer in silence. For guidance on best practise on how to support a student who is the victim of image-based sexual abuse, see 'recommendations for staff'.
- Online:** Teachers should actively work to challenge the notion that a future employer will be able to Google someone's name and find naked pictures of them, and there's nothing they can do about it. Rather, students should understand that since this a crime on two possible counts - firstly, if they are under 18, it would constitute child sexual abuse material; and secondly, regardless of their age, if an image has been shared without consent this is also illegal. (As mentioned in the Recommendations section, to truly tackle sexual violence and online sexual harassment of all kinds, care should be taken to encourage students to think about the ethics of decisions, and not just the legality.) There are a number of mechanisms in place to remove sexual images of people under 18, as well as support victims whose images have been shared non-consensually.

INTERNET WATCH FOUNDATION

The Internet Watch Foundation (IWF) can be used to 'anonymously and confidentially report child sexual abuse content and non-photographic child sexual abuse images'. The tool functions to remove sexual content of children which is shared via:

- Website
- Spam Email
- Usenet/Newsgroup

The tool can remove child sexual abuse content, and in the case of images, it also generates a hash for the images, meaning that if someone attempts to re-upload the image, it recognises it's the same image (even if slightly altered) and blocks it. Reports can be made by those under and over 18.

If the IWF is unable to manage the content, the site will re-direct you to other mechanisms (see below). The IWF only deals with publicly available information, and have advised that they don't work with apps. Therefore, to report an incident on Snapchat or Whatsapp, someone would need to contact CEOP or Report Harmful Content. To report an incident on Instagram to the IWF, someone may need to use the desktop version, to access the URL.

REVENGE PORN HELPLINE

The Revenge Porn Helpline offers support to over 18s who have had images shared non-consensually. Alerting school aged children to this support service helps to reinforce the message that this behaviour is unacceptable regardless of someone's age.

POLICE

Owing to the laws described above, young people who are victims of image based sexual abuse can go to the police to report the perpetrator and seek help in having any images removed from any relevant platforms and devices.

As we have stated above, while the law is not straightforward on these issues, all three subcategories of online sexual harassment have aspects of law which can be used to prosecute perpetrators. Each case is unique but the police are there to support anyone who falls victim to any of these issues.

REPORTING SEXUAL COERCION, THREATS AND INTIMIDATION

- Offline:** Creating a culture of reporting is essential to tackling the normalisation of online sexual harassment. Students should be encouraged to report any abusive behaviour to someone they trust, rather than feel they have to suffer in silence. They could report to a parent, carer or a member of school staff who they trust. These individuals should be provided with the necessary information to know where they can go to find resources to support the young person.
- Online:** See 'reporting to online support organisations and social media platforms' below.

REPORTING TO ONLINE SUPPORT ORGANISATIONS AND SOCIAL MEDIA PLATFORMS

Social Media

Snapchat, Instagram and other apps have built-in reporting mechanisms. It is important that students understand the functions involved to know how to report content and users, as well as other digital defence strategies such as blocking and changing their privacy settings. However, whilst using these functions should be encouraged, as many young people are aware, they are not always effective, and can sometimes be slow to remove content, only deactivate an account in instances of bulk reporting, and cannot prevent content from being re-uploaded.

CEOP (CHILD EXPLOITATION AND ONLINE PROTECTION COMMAND)

CEOP is a department of the National Crime Agency. CEOP exists to keep children safe from sexual abuse and grooming online. As with the Internet Watch Foundation, if CEOP is not the appropriate tool to manage an incident, it will redirect the user to an alternative source of support (e.g. IWF or Childline).

CEOP gives the following examples of reports they manage - all of which are examples of sexual coercion, threats and intimidation online:

- Someone online has asked me to send them nude images
- I shared a nude image with someone online and they are threatening me
- Someone online is putting pressure on me to do things I don't want to do.

As the Internet Watch Foundation advises, if someone's intimate images are stored without consent on someone else's device, they would not be able to manage this situation and CEOP would be the appropriate support service. As with the IWF, CEOP's reporting tool can be used by parents, teachers and those under 18 themselves. Once someone makes a report, a Child Protection CEOP will review the report, and where appropriate will pass incidents to local police.

REPORT HARMFUL CONTENT

Report Harmful Content is provided by the UK Safer Internet Centre and run by the South West Grid for Learning. The site allows you to report a number of online safety issues which could encompass various forms of online sexual harassment, including:

- Threats
- Bullying and harassment
- Online abuse
- Unwanted sexual advances (not image based)

The site allows you to select the specific social media platform on which the incident has occurred. Prior to making a report to Report Harmful Content, they lay out clear instructions on how to report to the social media platform.

FURTHER INFORMATION AND USEFUL LINKS

- [NSPCC's pages on online safety](#)
- [Supré Foundation and Alannah & Madeline Foundation - Image Based Bullying. So Not OK.](#)
- [Childline - bullying on social media](#)
- [Internet Matters - Cyberbullying](#)
- [Thinkuknow](#)
- [UK Council on Child Internet Safety \(UKCCIS\)](#)
- [Sexplain staff training](#)
- [Childnet](#)

SUPPORT SERVICES

- [Childline](#)
- [CEOP](#)
- [Revenge Porn Helpline](#)
- [Internet Watch Foundation](#)
- [Report Harmful Content](#)
- [Stonewall](#)
- [Mermaids](#)
- [The Mix](#)
- [Young Minds](#)

GLOSSARY OF KEY TERMS:

Online sexual harassment refers to a range of behaviours where digital technologies are used to facilitate both virtual and face-to-face sexually based harms.

Unsolicited sexual content online refers to any sexual content shared online which is not wanted by the recipient. This could include content seen on apps, messaging services and websites which has not been sought out by the user.

Image-based sexual abuse refers to the non-consensual creation and/or distribution of sexual images. This is often referred to as **revenge porn**, though we use the term image-based sexual abuse for the reasons outlined on page 8.

Sexual coercion, threats and intimidation online could include a person receiving threats of a sexual nature or being coerced to engage in sexual behaviours on or offline via digital technologies.

Digital defence is a term we use here to describe how young people can be equipped with the key tools to defend themselves against various threats online.

Grooming is when an adult builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them (NSPCC). It can take place on or offline. Typically the term grooming may be used where there is an age-gap between the child and the groomer. If such behaviour was taking place between children of the same age, we might describe this as peer-to-peer abuse.

Slut-shaming refers to when someone (typically a girl or woman and sometimes also gay men) is criticised and judged for sexual behaviour. In the context of image-based sexual abuse, it is to suggest, for example, that a girl or a woman should not have shared a nude in the first place.

Victim-blaming refers to when the victim of a crime or abuse is held as wholly or partially responsible for their mistreatment or abuse.

An intersectional approach is one that takes into consideration how social categories such as race, class, and gender overlap and intersect, determining the kinds of discrimination and disadvantages people experience. The term 'intersectionality' was coined by Professor Kimberlé Crenshaw in 1989.

Rape culture is one in which 'sexual violence against women is implicitly and explicitly condoned, excused, tolerated and normalised' (11).

Sexual double standards refers to the way in which men and women are held to different standards of sexual conduct, and men are granted greater sexual freedom than women.

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ONLINE SEXUAL HARASSMENT:
COMPREHENSIVE GUIDANCE FOR SCHOOLS

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