Safeguarding Aware Autumn 2026

AWARE



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Welcome

Welcome to another edition of the Keoghs Safeguarding Aware newsletter. In this edition, we are pleased to present a collection of articles covering various topics, including:

Lauranne Nolan, Senior Associate Solicitor and Safeguarding lead, discusses the creation of the Child Protection Authority in England and how it intends to operate.

Patrick Williams, Senior Associate Solicitor, considers the emerging risks of child sexual abuse material and AI, as well as online safeguarding for children and Ofcom's call for evidence on online safety for women and girls.

Anna Churchill, Senior Associate, discusses the end of the supervision exemption as implemented by the Crime and Policing Act 2026 and what that means for organisations working with children.

Nicola Markie, Solicitor, provides a helpful summary of what public inquiries teach organisations about safeguarding claims.

Daniel Tyler, Senior Associate Solicitor, outlines the findings in the latest report from the Centre of Expertise on Child Sexual Abuse in relation to the scale and nature of child sexual abuse.

We hope you find the contents informative and helpful. If you would like to discuss any of the articles or their implications, please do not hesitate to contact our Safeguarding Lead,

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Contents

The End of the Supervision Exemption: What the Crime and Policing Act 2026 Means for Organisations Working with Children 04

Preparing for Scrutiny: What Public Inquiries Teach Organisations About Safeguarding Claims 07

Establishing the Child Protection Authority in England: An update 11

Child Sexual Abuse Material and Artificial Intelligence: Emerging Risks and Safeguarding Responsibilities 14

SafetyMode and IWF Partnership Enhances Online Safeguarding for Children 17

Ofcom Call for Evidence on Women and Girls' Online Safety 19

The Scale and Nature of Child Sexual abuse: Review of evidence 22

The End of the Supervision Exemption: What the Crime and Policing Act 2026 Means for Organisations Working with Children

Organisations working with children face a significant safeguarding change from 1 September 2026. The Crime and Policing Act 2026 removes the supervision exemption from the definition of regulated activity, bringing many volunteer roles within scope for enhanced vetting and barring checks.

This article explains what is changing, why it matters, and the practical steps organisations should take to prepare.



Author:
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What Has Changed?

The Crime and Policing Act 2026 introduces a significant change to the definition of regulated activity with children by removing the long-standing "supervision exemption". The change comes into force on 1 September 2026 and affects organisations working with children across England.

Regulated activity is defined by the Safeguarding Vulnerable Groups Act 2006 and identifies work from which barred individuals must be excluded. Historically, some volunteers carrying out activities such as teaching, training, instructing, caring for or supervising children were not considered to be engaged in regulated activity where they were under reasonable day-to-day supervision by an individual already undertaking regulated activity.

The new legislation removes this exemption, meaning that supervision will no longer determine whether many volunteer roles fall within the scope of regulated activity. Instead, the focus will be on the nature and frequency of the activities being carried out.

How Have the Rules Changed?

Under the previous framework, a volunteer who regularly worked with children could fall outside regulated activity if suitable supervision arrangements were in place. This meant that organisations were often unable to obtain a Children's Barred List check for those individuals, even where they had regular contact with children.

From 1 September 2026, individuals who frequently:

- teach children;
- train or instruct children;
- care for children; or
- supervise children,

will generally be considered to be undertaking regulated activity regardless of whether they are supervised by another adult.

The change primarily affects volunteers because paid staff undertaking these activities were already likely to be engaged in regulated activity. As a result, many volunteer roles that previously fell outside the regulated activity framework will now fall within it.

Example

Before September 2026, a volunteer helping children with reading once a week in a school may not have been undertaking regulated activity if they were supervised by a teacher. From September 2026, that same volunteer is likely to be considered to be undertaking regulated activity regardless of supervision and will therefore require an Enhanced DBS check with Children's Barred List information.

Impact of the New Rules on Organisations

The reforms are intended to strengthen safeguarding arrangements and address concerns that barred individuals could still access volunteer roles involving substantial contact with children.

Enhanced Safeguarding

Removing the supervision exemption creates a clearer and more consistent safeguarding framework. Individuals carrying out the same activities will be subject to the same regulatory requirements regardless of the supervision arrangements in place.

Greater Access to Barred List Checks

Where a volunteer is undertaking regulated activity, organisations will be able to obtain an Enhanced DBS check including Children's Barred List information. This helps organisations identify individuals who are prohibited from working with children before they commence their role.

As a result, organisations can verify whether volunteers carrying out regulated activity are barred from working with children. The reforms seek to address a safeguarding gap by allowing appropriate barred list checks where volunteers are carrying out regulated activity.

Increased Public Confidence

The reforms reinforce public confidence in safeguarding arrangements by ensuring that individuals who work regularly and directly with children are subject to the highest level of pre-engagement vetting, irrespective of the supervision arrangements in place.

Practical Impact on Childcare and Other Organisations

While the change is relatively straightforward in principle, organisations will need to review their existing arrangements carefully ahead of the changes coming into force on 1 September 2026.

Review Volunteer Roles

Schools, nurseries, childcare providers, youth organisations, sports clubs, faith organisations and charities should review volunteer positions to determine whether they now fall within the definition of regulated activity.

Volunteers are likely to be undertaking regulated activity where they teach, train, instruct, care for or supervise children on more than three days within a 30-day period, or overnight. Roles previously excluded because of supervision may now require an Enhanced DBS check with Children's Barred Listinformation.

Update Recruitment Procedures

Organisations will need to ensure that recruitment and onboarding processes reflect the new requirements. Volunteers undertaking regulated activity will require an Enhanced DBS check with Children's Barred List information before engaging in the role.

Review Policies and Training

Safeguarding policies, volunteer management procedures and staff training materials should be reviewed and updated to ensure they accurately reflect the new legal position. Organisations should also ensure that managers understand which activities now constitute regulated activity.

Additional Administrative Burden

Some organisations may experience an increase in administration and compliance costs as a greater number of volunteers become eligible for barred list checks. However, these requirements are likely to be viewed as proportionate in light of the safeguarding benefits that the reforms are intended to achieve.

Legal Responsibilities

It remains a criminal offence for a barred person to engage in regulated activity and for an organisation knowingly to permit a barred person to undertake such work. It is therefore essential that organisations correctly identify those roles that now fall within the definition of regulated activity.

Conclusion

The removal of the supervision exemption is one of the most significant changes to the regulated activity framework since the reforms introduced by the Protection of Freedoms Act 2012. By shifting the focus from supervision arrangements to the nature of activities being undertaken, the Crime and Policing Act 2026 simplifies the assessment of many volunteer roles and strengthens safeguarding protections for children.

While the reforms are likely to increase DBS checking requirements for many organisations, they provide a clearer and more consistent safeguarding framework. Organisations that review volunteer roles, recruitment practices and safeguarding procedures now will be well placed to comply with the new requirements when they come into force on 1 September 2026.

Preparing for Scrutiny: What Public Inquiries Teach Organisations About Safeguarding Claims

The Child Safeguarding Practice Review Panel has published a briefing on Preparing for a Public Inquiry.

The briefing provides valuable insight for organisations involved in safeguarding children and vulnerable adults. While public inquiries are not intended to determine civil liability, they often examine the same issues that arise in child sexual exploitation (CSE), abuse, negligence and human rights claims, including safeguarding systems, information sharing, governance, decision-making and organisational culture.

For local authorities, police forces, NHS organisations, schools, colleges, religious institutions and charities, inquiries offer important lessons about how organisational actions and omissions may be scrutinised years after the events in question.



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The Growing Focus on Systemic Failures

Modern litigation rarely centres solely on the actions of a single individual. Instead, claimants increasingly allege failures at an organisational level, including:

- Failure to identify safeguarding risks.
- Failure to share information.
- Inadequate supervision or oversight.
- Poor record-keeping.
- Failure to respond appropriately to reports or disclosures.
- Deficiencies in safeguarding policies and procedures.

These are the same themes frequently explored by public inquiries. The Southport Inquiry, established following the fatal stabbing of three girls at a dance class in 2024, has examined issues including information sharing, risk ownership and multi-agency coordination. These are all familiar themes in CSE, abuse, negligence and human rights claims.

Records Matter

One of the strongest messages from the Panel's guidance is the importance of record preservation and documentation. Inquiries routinely require organisations to disclose referrals, assessments, meeting minutes, safeguarding records, emails, call logs and decision-making documents. The same documents often become central evidence in litigation.

Where records are incomplete, missing or inconsistent, organisations may struggle to demonstrate:

- Why decisions were made.
- Whether concerns were investigated.
- What information was known at the time.
- Whether safeguarding procedures were followed.

Good record-keeping is therefore not merely an administrative requirement but an essential component of managing litigation and reputational risk.



Multi-Agency Working

Many CSE, abuse, negligence and human rights claims involve multiple agencies holding different pieces of information about a child, perpetrator or emerging risk. A recurring feature of inquiries is the examination of how effectively those agencies communicated and worked together.

For organisations defending claims, scrutiny may extend well beyond their own actions. Courts, inquiries and regulators increasingly examine:

1. **Information-sharing arrangements.**
2. **Escalation procedures.**
3. **Joint decision-making.**
4. **Safeguarding partnerships.**
5. **Responses to known patterns of risk.**

The ability to evidence effective multi-agency engagement can be an important factor when responding to allegations of systemic failure.

The Importance of Organisational Learning

One of the more significant observations within the briefing is that learning should continue even when a public inquiry is underway.

When historical failings are identified, organisations should be able to demonstrate:

- Reflection on lessons learned.
- Policy development.
- Improvements in safeguarding practice.
- Workforce training.
- Enhanced governance arrangements.

While such improvements will not remove liability for historic matters, they may demonstrate accountability and a commitment to preventing future harm.

Preparing for Scrutiny

The briefing identifies several hallmarks of good practice which also have direct relevance to CSE, abuse, negligence and human rights claims.

These include:

- Early identification of agency involvement.
- Effective information sharing.
- Robust governance.
- Clear decision-making.
- Preservation of evidence.
- Leadership oversight.
- Workforce well-being and support.

For organisations, these measures help ensure that, should allegations arise years later, there is a clear evidential basis for explaining the actions taken and the decisions made.

A Wider Cultural Issue

An important lesson from recent inquiries is that scrutiny increasingly extends beyond individual incidents and asks broader questions about organisational culture.

Investigations frequently consider whether:

- Concerns were taken seriously;
- Vulnerable children were listened to;
- Professionals felt able to challenge decisions;
- Safeguarding was prioritised by senior leadership; and
- Lessons from previous incidents had been learned.

In both inquiries and civil litigation, organisations are increasingly judged not only on what happened, but on whether their systems and culture were capable of protecting vulnerable people from harm.

Conclusion

For organisations responding to CSE, abuse, negligence and human rights claims, the lessons from public inquiries are clear. Strong safeguarding governance, effective multi-agency working, accurate record-keeping and a culture of openness and learning are essential. Public inquiries demonstrate that scrutiny often focuses on systemic failures rather than isolated mistakes, and organisations must be prepared to explain not only what decisions were made, but also why they were made and how safeguarding responsibilities were discharged.

In that respect, the best preparation for both a public inquiry and litigation is the same: robust governance, clear documentation, transparent decision-making and a demonstrable commitment to safeguarding improvement.

As regulatory expectations continue to evolve, organisations that embed strong safeguarding governance and robust record-keeping practices will be better positioned to respond to both public scrutiny and legal challenge.



Establishing the Child Protection Authority in England: An update

In 2022, the Independent Inquiry into Child Sexual Abuse ('IICSA') recommended that a Child Protection Authority ('CPA') in England and Wales should be established in order to improve practice in child protection and to provide advice make and to provide advice and, make recommendations to government in relation to child protection policy, as well as granting the power to inspect.



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What will the CPA do?

In December 2025, the Department of Education in England announced the creation of a CPA to enhance the child protection system and provide national oversight. Following a consultation on these proposals, which concluded in March 2026, and the outcome of the consultation published in July 2026, its role (subject to further review) includes:

- Providing strong leadership to ensure good child protection practice is embedded consistently across local areas.
- Addressing systemic issues such as those highlighted by the Casey Audit into group-based child sexual exploitation and abuse.
- Ensuring agencies responsible for looking after children work together closely and share relevant information to prevent any child from falling through the cracks.
- Identifying emerging threats, risks and patterns of harm and holding services to account for protecting children.

The CPA will operate across England as a multi-agency, multidisciplinary body, bringing together expertise from across child protection, analysis and frontline practice. However, it will maintain enough independence to provide robust challenge.

Until the CPA is fully operational, the Child Safeguarding Practice Review Panel will continue to review serious incidents in England. The Panel's core functions will inform and shape the CPA's remit. Once the CPA is fully established, the Panel will be dissolved.

It will focus on children who are suffering, or are likely to suffer, significant harm. It will look at harm wherever it occurs, including harm from families, peers, community, institutions, or online.

It will also seek to address the following:

Leadership of the child protection system

The CPA will provide evidence-based advice to government on systemic issues and improvements. It will also escalate concerns where progress is insufficient and work with inspectorates, regulators, government departments and safeguarding partnerships to ensure that learning is translated into practice and improvements are made.

Horizon scanning

The CPA will identify and respond to emerging risks using data and insights from across the system. Intelligence will be shared and used to inform national decisions.

Identify and address evidence gaps

The CPA will establish a dedicated analytical function to identify and prioritise gaps in child protection research. It will commission work where needed and coordinate with existing organisations. It will focus on areas of greatest harm, uncertainty or underreporting.

Promote and embed good practice

The CPA will identify and share effective child protection practice through guidance and resources. The CPA will work with frontline practitioners, safeguarding partnerships, the voluntary sector, and those with lived experience to design and test approaches to improvement.

Workforce influence

The CPA will work with government, regulators, and professional bodies to share insights on emerging harms, effective practice, and workforce development needs. It will help ensure that child protection training and professional standards remain relevant, consistent, and responsive to the needs of children and families.

Supporting multi-agency learning and recommendations

The CPA will bring together partners across sectors. It will support local areas with practical guidance, tools, and targeted support. It will strengthen oversight of how recommendations are implemented and whether they lead to improved outcomes. The CPA will also highlight system-wide challenges and help inform government decisions, with a continued focus on reducing harm, particularly for groups at heightened risk of abuse, such as children with SEND.

Responding to serious and consistent failings

The CPA will be given statutory powers to hold organisations to account and take action. This includes powers to:

1. compel the sharing of information (data and evidence);
2. advise responsible Secretaries of State to inform single or multi-agency inspection and other regulatory activity;
3. share information with inspectorates and regulators to focus activity on driving improvements; and
4. advise the inspectorates on Joint Targeted Area Inspection (JTAI) planning.

Conclusion

There is strong support for the establishment of the CPA which will sit within a broader reform and strengthening of child protection, including: the Children's Wellbeing and Schools Act 2026, which seeks to improve how the system works in practice, including through strengthened multi-agency arrangements and improved information sharing; and the Crime and Policing Act 2026, which introduces a mandatory duty to report child sexual abuse (date to come into force still awaited).



Child Sexual Abuse Material and Artificial Intelligence: Emerging Risks and Safeguarding Responsibilities

The rapid advancement of artificial intelligence (AI) is transforming how individuals learn, communicate and create content. However, alongside these benefits, there are growing concerns in respect of the use of AI to create, manipulate and distribute child sexual abuse material (AI-CSAM). This has led to recent guidance issued by the National Crime Agency (NCA) and the Internet Watch Foundation (IWF) highlighting the scale of this emerging risk and the safeguarding challenges facing organisations, professionals and families.



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What is AI-CSAM?

AI-CSAM refers to child sexual abuse material that has been wholly generated, manipulated or enhanced using artificial intelligence technologies.

This can include:

- The creation of highly realistic (often referred to as photorealistic), manipulated images and videos of a child or young person. This can be done by altering existing photos or videos or creating entirely AI-generated sexual abuse content.
- The use of so-called 'Nudifying' or 'undress' AI tools can be used to digitally remove clothing from images creating sexual abuse imagery of a child or young person.
- The use of real child sexual imagery to feed AI models to create new image sets and videos of existing survivors.

Importantly, material does not need to depict a real child or a real abuse event to be unlawful. Under UK legislation, AI-generated indecent images of children, including content such as cartoons, illustrations and animations, may constitute criminal offences.



A Rapidly Escalating Threat

The guidance highlights the increasing prevalence of AI-generated abuse material. According to the IWF's 2025 Annual Data and Insights Report, 8,111 AI-generated child sexual abuse images and videos were identified from 498 reports, representing a 154% increase compared with the previous year. The data reflects growing accessibility to powerful image-generation tools and an evolving threat landscape that is challenging traditional safeguarding approaches. As professionals working with children and young persons, understanding these risks is essential to help protect them from potential harm and to respond effectively to incidents.

Legal and Safeguarding Implications

Under UK legislation, the creation, possession, and distribution of indecent images or pseudo-photographs of children are criminal offences, irrespective of whether the material is generated using artificial intelligence. The involvement of AI technology provides no defence to criminal liability and does not lessen the harm associated with the production and dissemination of such material.

The NCA and IWF also stress that AI-CSAM can cause significant harm even where no direct contact has occurred. Victims may experience distress, humiliation, loss of control and ongoing anxiety arising from the knowledge that AI-generated sexual images of them exist or may be disseminated online. Additionally, the creation and circulation of such material can contribute to the wider normalisation of child sexual exploitation.

Risks in Educational and Youth Settings

Of particular concern are incidents involving young persons creating AI-generated sexual images of peers. The guidance notes that some children and young persons may view such conduct as a joke, banter or harmless experimentation without appreciating the legal consequences or lasting emotional impact on the victim. Any such incident should be treated as a safeguarding matter and managed in accordance with established child protection procedures.

Professionals are advised that it is not their responsibility to determine whether an image is AI-generated. Where CSAM is identified or suspected, it must be treated as a safeguarding matter. Concerns must be reported immediately through the appropriate safeguarding channels, with referral to the police where necessary and in accordance with applicable legal and regulatory requirements.

Prevention Through Consent and Digital Awareness

The UK Online Harms Early Warning Working Group issued guidance hosted by the UK Safer Internet Centre to protect school images from AI manipulation and abuse. It advises schools and youth organisations to minimize high-risk digital sharing of identifiable children's photos and manage online media securely.

Further, organisations working with children are encouraged to review image consent processes regularly, ensure parents and carers understand how photographs may be used, and consider whether images featuring children are necessary at all.

The guidance for parents and carers similarly recommends:

- Reviewing privacy settings on social media platforms.
- Auditing existing online content featuring children.
- Limiting the audience for shared images.
- Revisiting image-sharing consent as children grow older.
- Encouraging open discussions about AI, deepfakes and online safety.

Responding to Incidents

Where AI-generated sexual abuse imagery is discovered, the NCA and IWF guidance recommends a prompt and measured response.

Key actions include:

- Reporting concerns to safeguarding leads or appropriate authorities.
- Avoiding the downloading, sharing or storing of offending content.
- Preserving evidence such as messages, usernames and links.
- Reporting material to the relevant platform.
- Contacting the police where appropriate.
- Ensuring emotional and wellbeing support is available for affected children and families.

For children and young persons who become victims, services such as Report Remove | Childline can assist in seeking the removal of images from online platforms.

Click here for Report Remove I Childline >

Lessons for Organisations

For organisations working with children and young persons, the emergence of AI-CSAM reinforces the need for robust safeguarding frameworks, regular staff training and clear reporting procedures. Existing policies concerning image sharing, cyber safety and harmful sexual behaviour should be reviewed to ensure they adequately address AI-related risks.

The guidance also illustrates a broader point relevant to all organisations: the misuse of AI technology is creating new legal, reputational and safeguarding challenges that require proactive governance. Awareness, education and early intervention remain the most effective tools in reducing risk and protecting vulnerable individuals.

SafetyMode and IWF Partnership Enhances Online Safeguarding for Children

A significant development in the child online safety sector has been announced through a new partnership between UK-based companySafetyMode and the Internet Watch Foundation ('IWF'), aimed at strengthening protections for children using smartphones and digital platforms.



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SafetyMode develops child-focused smartphone technology designed to provide young people with the benefits of digital connectivity while reducing their exposure to harmful online content. Its software, which is used on the OtherPhone device co-designed with Mumsnet, uses real-time artificial intelligence to monitor and block inappropriate content across applications and Internet platforms.

IWF is a UK-based independent charity and child protection organisation whose primary purpose is to identify, assess, report, and help remove online child sexual abuse material ('CSAM') from the Internet. It works closely with law enforcement agencies, government, technology companies, and international partners to make the online environment safer for children.

On 1 July 2026, SafetyMode became an IWF member. As part of its membership, SafetyMode will integrate a number of specialist intelligence feeds, including the IWF URL List, Non-Photographic Imagery URL List and Keywords List. These resources are designed to identify and block access to known webpages containing CSAM, prevent exposure to non-photographic abuse imagery and strengthen detection of language commonly associated with the sharing of child sexual abuse content.

From a safeguarding perspective, the partnership demonstrates the growing role of proactive technological interventions in protecting children online. Rather than relying solely upon parental supervision or post-incident reporting, the integration of IWF intelligence enables known harmful content to be identified and disrupted before a child can view or interact with it.

The initiative is also significant because it seeks to address a broad spectrum of online harms. In addition to reducing exposure to CSAM, the enhanced protections are intended to assist in safeguarding children against risks such as grooming and sextortion, both of which remain significant concerns for parents, schools and safeguarding professionals. By combining SafetyMode's AI-based monitoring capabilities with the IWF's extensive expertise in identifying and disrupting CSAM online, the partnership provides an example of how industry and safeguarding bodies can work together to create safer digital environments for children.



Ofcom Call for Evidence on Women and Girls' Online Safety

On 9 September 2026, Ofcom published a Call for Evidence seeking information on whether women and girls are experiencing a safer online environment following publication of its *A Safer Life Online for Women and Girls* guidance in November 2025. The exercise forms part of Ofcom's ongoing oversight of the Online Safety Act 2023 and will inform a report due to be published during the second quarter of 2027 assessing progress across the sector.

Patrick Williams, Senior Associate in Keoghs Abuse Team, examines the consultation and its wider implications for organisations responsible for safeguarding individuals in digital environments.



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Regulatory Background

As the UK's online safety regulator, Ofcom is responsible for overseeing compliance with the Online Safety Act 2023. The legislation imposes duties on regulated services to tackle illegal content, protect children from harmful material, and mitigate online harms that disproportionately affect women and girls.

In November 2025, Ofcom published *A Safer Life Online for Women and Girls*, guidance developed following engagement with survivors, victim support organisations, civil society groups, and online safety experts. The guidance sets out a range of practical measures intended to reduce online gender-based harms.

Ofcom's latest Call for Evidence seeks information on:

- whether service providers have implemented the guidance;
- which measures have proved most effective;
- whether the online experiences of women and girls have improved; and
- whether online harms have evolved or intensified since publication of the guidance.

Responses are invited until 4 November 2026, with Ofcom's findings expected in the second quarter of 2027.

Online Gender-Based Harm

Ofcom identifies four principal categories of online gender-based harm that continue to disproportionately affect women and girls and remain areas of regulatory focus:

Misogynistic Abuse and Sexual Violence

This includes abusive, hateful, threatening or violent content that promotes misogyny or normalises sexual violence. Ofcom has expressed particular concern regarding the role of recommendation systems and algorithmic amplification in exposing users, particularly young men and boys, to such content.

Pile-Ons and Coordinated Harassment

These incidents involve the coordinated targeting of women or girls through abusive messages, threats, harassment campaigns or other hostile online behaviour. Public figures, journalists, politicians and campaigners are among the groups most frequently affected.

Stalking and Coercive Control

Digital technologies may be used to facilitate stalking, surveillance, coercive control and other forms of controlling behaviour within intimate, familial or personal relationships.

Image-Based Sexual Abuse

This category includes the non-consensual sharing of intimate images, cyberflashing and the circulation of self-generated indecent imagery involving children.

Safety by Design

A central theme of Ofcom's guidance is the adoption of a "safety by design" approach. Rather than relying solely upon reactive moderation after harm has occurred, providers are encouraged to embed safeguards within platform design, governance arrangements and operational processes from the outset.

The guidance identifies nine recommended actions, grouped into three overarching themes:

Taking Responsibility

- Ensuring governance and accountability frameworks adequately address gender-based harms;
- Conducting risk assessments that specifically consider risks affecting women and girls; and
- Increasing transparency regarding safety performance and outcomes.

Preventing Harm

- Undertaking product testing and abusability assessments;
- Implementing safer default settings; and
- Reducing the circulation and amplification of harmful content.

Providing Support

- Giving users greater control over their online experience;
- Improving reporting and escalation mechanisms; and
- Responding effectively and proportionately when harm occurs.

Although directed primarily at regulated online services, these principles increasingly represent best practice standards for digital safeguarding and risk management more generally.

Wider Enforcement Developments

The Call for Evidence should be viewed within the context of a wider programme of regulatory activity aimed at strengthening protections for women and girls online. Ofcom highlights several significant regulatory developments demonstrating continued focus on protecting women and girls online. These include:

Cyberflashing

Following the designation of cyberflashing as a priority offence under the Online Safety Act 2023, Ofcom has updated its regulatory framework to require regulated services to assess and mitigate cyberflashing risks.

Intimate Image Abuse

Ofcom has also accelerated initiatives aimed at reducing the circulation of non-consensual intimate imagery, including encouraging the adoption of hash-matching technologies capable of identifying and preventing the re-uploading of known images.

Crime and Policing Act 2026

Of particular significance is the introduction of duties requiring service providers to remove non-consensual intimate images within 48 hours. Ofcom has indicated that further consultation on implementation of these requirements will take place before the end of 2026.

Collectively, these developments demonstrate an ongoing regulatory trend towards faster intervention, more proactive risk management, and higher evidential expectations for regulated entities.

Implications for Organisations

While the guidance is directed principally at online platforms, many organisations operate digital communities, communication channels and online environments in which similar risks may arise.

Educational establishments, charities, sports organisations, religious institutions, membership bodies and employers should consider the following:

- Maintaining robust safeguarding arrangements for digital environments;
- Ensuring effective reporting and escalation procedures are in place;
- Assessing and mitigating risks associated with image-based abuse;
- Reviewing platform design, user permissions and access controls;
- Testing incident response and crisis management frameworks; and
- Ensuring appropriate leadership oversight of online safety and safeguarding risks.

Looking Ahead

Ofcom's Call for Evidence represents the next stage in the implementation of the Online Safety Act 2023. More importantly, it signals the regulator's intention to assess whether online services have moved beyond policy commitments and translated those commitments into demonstrable improvements in user safety.

Organisations should use the period before publication of Ofcom's findings in 2027 to review governance arrangements, reassess online safeguarding risks and ensure that policies, reporting mechanisms, technological controls and incident management frameworks remain capable of addressing emerging forms of online gender-based abuse.

Stakeholders wishing to contribute to the review have until 4 November 2026 to submit evidence, with Ofcom's report expected during the second quarter of 2027.

The Scale and Nature of Child Sexual abuse: Review of evidence

An estimated 20% of girls and 10% boys in England and Wales are sexually abused in childhood, experts find.

In July, the Centre of Expertise on Child Sexual Abuse ('the CSA Centre') published its latest report on the scale and nature of the problem in England and Wales. Founded in 2017, the CSA Centre is funded by the Home Office and hosted by Barnardo's; it aims to reduce the impact of child sexual abuse through improved prevention and responses.



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Back in 2021, the CSA Centre estimated that around one in ten children in England and Wales are sexually abused. Five years on, the CSA Centre now estimates that the figure is one in six. It suggests three possible reasons for this significant increase. Firstly, measurement has improved: for instance, the England and Wales Crime Survey now takes account of sexual abuse across a person's entire childhood rather than stopping at 16. Secondly, online child abuse has become more visible. Thirdly, there is a greater awareness of child sexual abuse and a greater willingness to report. The CSA Centre projects that at least 500,000 children experience in-person contact child abuse each year in England and Wales. However, the overall scale of abuse is even greater because this figure does not include abuse that happens online and that which takes place in person but without contact, such as exposure.

Digging deeper into the report, several themes emerge:

- There is a gender split. It is estimated that 10% of boys are sexually abused during childhood. The corresponding figure for girls is 20%.
- Although childhood sexual abuse is primarily committed by adults, a significant amount is carried out by other children. The 2024 Crime Survey for England and Wales published information about whether the people who had sexually abused respondents were adults or other children: 70% of respondents who had been abused said it had involved adults and 40% said it had involved other children. According to previous research by the Centre, many of those children have experienced adversity themselves.
- The 2024 Crime Survey indicates that people who have had other adverse childhood experiences are likelier to have experienced childhood sexual abuse as well. For example, 40% of respondents who had lived in a care or foster home said they had been sexually abused at some point in their childhood, compared with 9% of respondents overall.
- There remains a large gap between the estimated prevalence of child sexual abuse and its identification by agencies. This is particularly true of local authorities. The CSA Centre noted that in 2024/25, the overall number of local authority child needs assessments recording concerns about any form of child sexual abuse fell to its lowest level in a decade. According to the 2024 Crime Survey, one in three respondents who had experienced any form of abuse or neglect during childhood stated that this had included sexual abuse. However, just one in six local authority assessments recording abuse or neglect as a factor in 2024/25 included any form of sexual abuse. The CSA Centre considered that this shows the child sexual abuse is being disproportionately under-identified.
- The report underlines that there is much work to be done to prevent child abuse. In a call to action, the CSA centre states that a dedicated survey of older children and young adults is needed to better understand the scale and nature of child sexual abuse, particularly in light of the higher prevalence of child sexual abuse among the younger respondents to the 2024 Crime Survey. It recommends government funding for a Child Safety survey developed by the Office of National Statistics.

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