



SAFEGUARDING UPDATE

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New UK AI Law: What schools need to know to safeguard children

A landmark new law has been introduced in the UK to tackle the growing threat of AI-generated child sexual abuse images and schools need to be aware of what this means for safeguarding.

Here's what you need to know:

Stronger protection at the source:

- The government is working with tech companies and child protection organisations to stop AI systems being misused to create abusive content in the first place.
- Designated bodies (including AI developers and the Internet Watch Foundation) will now be empowered to test AI models and ensure they are "safe by design."
- This means we could see proactive checks built into AI tools before they're released, rather than just removing abuse after the fact.

Surge in reports:

- Data from the Internet Watch Foundation reveals that reports of AI-generated child sexual abuse material more than **doubled in 2025**, increasing from 199 in 2024 to 426.
- Disturbingly, there's also been a sharp rise in images depicting infants (0-2 years old).
- Girls are disproportionately represented in these images.

Tougher legal measures:

- The changes will be introduced through the Crime and Policing Bill, bringing in new offences:
 - It will become illegal to create or use AI tools optimised for producing child sexual abuse material (CSAM).
 - Possession of "paedophile manuals" teaching how to use AI for this purpose will also be criminalised.
 - The law will also target those who run or moderate websites used to share this material.

School implications: What this means for you:

- While this law targets developers and offenders, schools must remain vigilant. The misuse of AI to create exploitative content can still impact pupils directly, through bullying, blackmail, or deepfake harassment.
- Your safeguarding policies should reflect these risks: ensuring staff are aware of AI-generated abuse, how to spot it, and how to respond.
- You may need to update your online safety education for pupils to include the risk of AI-based manipulation (eg "nudification" or face-swapping).
- Reporting pathways must be clear: any suspected deepfake, AI-generated harassment, or non-consensual intimate imagery should be referred to our DSL (Designated Safeguarding Lead) immediately.

Collaboration is key

- The government is establishing an expert group (AI and child safety) to help design safeguards and supervise testing.
- Schools should engage with charities (eg the Internet Watch Foundation) as trusted partners on education, prevention, and reporting.

Read:

<https://www.gov.uk/government/news/new-law-to-tackle-ai-child-abuse-images-at-source-as-reports-more-than-double>

Read:

<https://www.iwf.org.uk/news-media/news/ai-imagery-getting-more-extreme-as-iwf-welcomes-new-rules-allowing-through-testing-of-ai-tools/>

Rising online risk: What schools must know about child sexual abuse material on encrypted messaging

A recent report from the Internet Watch Foundation (IWF) has revealed growing public alarm about the sharing of child sexual abuse images and videos over end-to-end encrypted (E2EE) messaging services and there are important implications for schools to understand.

Here's what school leaders and safeguarding teams need to know:

What the IWF Report shows:

- According to a recent survey, **92% of UK adults are very or somewhat concerned about how child sexual abuse imagery circulates** through E2EE messaging platforms.
- Nearly **nine in ten people** (88%) support a "upload prevention" method that would block such content before it is sent, even in encrypted environments.
- The IWF argues this method is technically feasible: file "hashes" (digital fingerprints) of known abusive content are matched against a secure database, and if there's a match, the content is blocked, **all without breaking encryption**.

Why this matters for schools

Emerging online safety risk: Pupils may be exposed to exploitative imagery or grooming via private, encrypted messaging platforms, spaces that are harder to monitor.

Policy pressure on tech companies: The IWF is calling on government and tech providers to take greater responsibility for blocking known abusive content, even in encrypted settings.

Safeguarding implications: Schools should recognise that while encryption helps with privacy, it also gives offenders more opportunities to misuse messaging services.

What schools can do now

Update online safety education: Teach pupils about the risks of sharing or receiving sensitive content in private, encrypted messages. Emphasise that just because a service is "private" doesn't mean it's safe.

Review safeguarding policies: Ensure your child protection policy reflects the threat posed by E2EE services. Clarify how staff should respond to disclosures or allegations involving encrypted platforms.

Work with parents: Share resources (eg from IWF) so parents understand what encrypted messaging means for child safety. Encourage open, non-judgmental conversations at home about sending images, pressure to share, and reporting of concerning behaviour.

Report concerns: Make sure pupils, parents and staff know how to report suspected abuse safely and confidentially. Use links to trusted bodies such as IWF Report Remove when harmful or exploitative content is involved.

Read:

<https://www.iwf.org.uk/news-media/news/high-public-concern-at-spread-of-child-sexual-abuse-images-and-videos-in-end-to-end-encrypted-spaces/>

Read:

<https://www.iwf.org.uk/policy-work/preventing-the-upload-of-child-sexual-abuse-material-in-end-to-end-encrypted-app-environments/>

Why schools should care about the Children's Commissioner's Report on custodial remand

A powerful new report from the Children's Commissioner for England, titled "A Production Line of Pointlessness", has raised major concerns about how children are placed in custody while awaiting court and what this means for their education and welfare.

Here's what school leaders and safeguarding teams need to know:

Many children are held in custodial remand not because they pose an immediate risk, but because the systems intended to support them are failing. **In the last year alone, 441 children on remand did not go on to receive a custodial sentence**, and 168 had their cases dismissed altogether. The experience is often deeply traumatic, with children reporting anxiety, uncertainty about how long they will be detained, and a profound sense of powerlessness.

Those placed on remand frequently come from already vulnerable backgrounds, including poverty, disrupted education, or unmet special educational needs. **There is also a significant racial disproportionality**, with children from Black, Asian and mixed ethnic backgrounds disproportionately represented in custodial remand.

Impact on education

- Even short spells in remand can disrupt education, severing connections with school and delaying progress.
- According to the Children's Commissioner's research, many of those detained had already experienced disrupted schooling: over half were out of education for at least a full academic year before remand.
- The secure settings that do provide education face many challenges, staffing, lack of continuity, and the unpredictable length of stay make consistent learning difficult.
- Outcomes are poor: for example, a very small percentage of remanded children who take GCSEs pass, compared to their peers in mainstream education.

Why this matters for schools:

- **Early warning and support:** Many of the children who end up on remand were already struggling in school. Schools are uniquely positioned to identify vulnerabilities early, such as poor attendance, SEND, or exclusion and to refer to support services before things escalate.
- **Safeguarding role:** Custodial remand is not just a justice issue, it's a child protection issue. The use of remand can worsen existing trauma, isolate children from family and community, and reinforce negative pathways.
- **Partnership opportunities:** Schools should build stronger relationships with youth justice services, social care, and local authorities to advocate for alternatives to custody, such as therapeutic interventions or remand fostering.
- **Reintegration planning:** For those children who do return to school after remand, planning is essential. Schools and local services must coordinate to ensure educational continuity, catch-up support, and consistent reintegration.

What the Children's Commissioner is calling for:

- A shift away from custodial remand when safe alternatives exist (eg remand fostering, care-based solutions) rather than holding children in custody because there is nowhere else for them to go.
- The closure of Young Offender Institutions, replaced with smaller, more therapeutic settings closer to children's homes.
- System-wide reform to make sure education is a core part of any secure or remand detention, with better staffing and more stable learning environments.
- Closer data-sharing between the Department for Education and youth justice bodies to better identify and support at-risk children early.

Read:

<https://www.childrenscommissioner.gov.uk/resource/a-production-line-of-pointlessness-children-on-custodial-remand/>

Forthcoming free safeguarding webinars for Autumn term 2 2025

Sexism and sexual harassment - Tuesday 25th November

Child sexual exploitation (CSE) - Tuesday 2nd December

County lines - Tuesday 9th December

Trauma - Tuesday 16th December

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