



SAFEGUARDING UPDATE

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AI, child abuse imagery and schools: What every safeguarding lead needs to know

Artificial intelligence is transforming education in many positive ways. However, it is also creating new safeguarding risks that schools cannot afford to ignore.

The Internet Watch Foundation (IWF), working alongside the National Crime Agency (NCA), has recently issued guidance warning parents and carers about the growing misuse of AI to manipulate ordinary photographs of children into illegal child sexual abuse imagery. Whilst the guidance is aimed at families, it raises important questions for every school and college.

A photograph doesn't need to be inappropriate to become harmful

One of the most worrying messages from the guidance is that criminals no longer need access to indecent photographs of children.

Instead, they can obtain perfectly innocent images from:

- **School websites**
- **Social media**
- **Sports clubs**
- **Public events**
- **Family photographs shared online**

Using increasingly sophisticated AI tools, offenders can digitally manipulate these images to create realistic child sexual abuse material, often referred to as "deepfake" or "nudified" images. In some cases, entirely artificial children can also be generated using AI.

This is not a future problem

The technology already exists.

The IWF reports a significant increase in AI-generated child sexual abuse material during 2025, with thousands of illegal AI-generated images and videos identified. The quality, realism and accessibility of these tools continues to improve at an alarming pace.

Recent reports also highlight a UK school that became the target of organised criminals who downloaded pupils' photographs from the school's website, generated over 100 AI-created sexual images and attempted to blackmail the school.

What does this mean for schools?

This is not simply an online safety issue, it is a safeguarding issue.

Schools should begin reviewing several aspects of their safeguarding practice.

1. Review image policies

Schools should consider:

- **What photographs are published publicly?**
- **Do images show school logos or uniforms?**
- **Could locations be identified?**
- **Are photographs still needed once they have served their purpose?**
- **Are image consent arrangements regularly reviewed?**

Whilst schools should not stop celebrating pupils' achievements, a more risk-aware approach is now essential.

2. Review website and social media practices

Many schools have years of archived photographs available online.

DSLs may wish to work with communications teams to consider:

- **removing outdated galleries**
- **reducing publicly accessible images**
- **using group rather than individual photographs where appropriate**
- **avoiding unnecessary identification of pupils**

3. Update online safety education

Pupils increasingly understand deepfakes involving celebrities.

Many do not understand that:

- **AI can manipulate their own photographs**
- **creating fake sexual images of another child may be a criminal offence**
- **sharing AI-generated indecent images causes real harm regardless of whether the original photograph was innocent**

This should become part of age-appropriate relationships, sex and health education (RSHE), online safety and digital citizenship.

4. Support parents

Schools are well placed to share practical advice with families.

Simple messages include:

- **checking privacy settings**
- **limiting who can view children's photographs**
- **thinking carefully before posting school events publicly**
- **regularly reviewing historic social media posts**
- **discussing consent with older children before sharing photographs**

The aim is not to create fear, but informed decision-making.

5. Prepare DSLs

Designated Safeguarding Leads should ensure staff understand that disclosures involving AI-generated indecent imagery require exactly the same safeguarding response as any other child sexual abuse concern.

Staff should never dismiss concerns because "the images aren't real."

The emotional impact on the child is very real.

Schools should follow safeguarding procedures, preserve evidence where appropriate and seek advice from police or children's social care where necessary.

Professional curiosity matters

Children may disclose:

- **fake nude images circulating online**
- **threats involving manipulated photographs**
- **blackmail or sextortion**
- **anxiety after discovering AI-generated images of themselves**

Equally, some pupils may experiment with AI image tools without appreciating the criminal consequences.

This reinforces the importance of creating a safeguarding culture where children feel able to report concerns early.

Looking ahead

Artificial intelligence will continue to evolve rapidly.

For safeguarding leaders, this means online safety can no longer focus solely on social media, gaming and messaging platforms. AI-generated abuse, manipulated imagery and synthetic content are becoming part of the safeguarding landscape.

Policies, staff training, pupil education and parent engagement will all need to evolve alongside the technology.

The challenge for schools is not to eliminate every risk, but to ensure staff understand the emerging threats, recognise concerns promptly and respond confidently.

Read:

<https://www.iwf.org.uk/resources/ai-child-abuse-imagery-parent-guide/>

Improving help and child protection: What the new consultation means for schools

The Department for Education has launched a significant consultation that could shape the next phase of child protection and safeguarding practice in England.

The consultation, Improving Help and Child Protection: Revised Framework, seeks views on proposed changes to three key areas:

- **Working Together to Safeguard Children**
- **The Children's Social Care National Framework**
- **The development of new Multi-Agency Child Protection Teams (MACPTs)**

Whilst these proposals are still subject to consultation, they provide a clear indication of the future direction of safeguarding policy and practice. Schools should begin familiarising themselves with the proposals now to ensure they are well prepared for future changes.

Earlier help

The consultation reinforces the importance of providing children and families with support as early as possible to prevent concerns escalating. Schools remain central to identifying vulnerability, sharing information and making timely referrals. For DSLs, professional curiosity, accurate record keeping and early intervention are more important than ever.

Family help

The reforms continue to strengthen the Family Help model, bringing services together to provide more coordinated support for families. While referral processes remain unchanged, schools should expect local Family help pathways and threshold guidance to continue evolving.

Stronger multi-agency working

A key proposal is the introduction of Multi-Agency Child Protection Teams, bringing together children's social care, health, police and education to improve information sharing and decision making. Schools' safeguarding responsibilities remain the same, but partnership working is likely to become more integrated.

Greater family involvement

The consultation places increased emphasis on involving wider family networks, where safe and appropriate, to identify support before concerns reach crisis point.

Consultation:

<https://consult.education.gov.uk/statutory-framework-team/improving-help-and-child-protection-revised-tra/>

Summer term 2 - 5-minute 'bitesize' and audio version safeguarding refresher videos

Cybercrime - Tuesday 14th July

KCSIE 2026 - Once the updated version of Keeping Children Safe in Education (KCSIE) has been published, I will update all of my September safeguarding resources.

Each year, I send schools a link to 'Everything you need for September' as early as possible. This comprehensive resource includes an updated safeguarding and child protection policy, powerpoint presentations, staff safeguarding quizzes with answers, useful guidance, templates and a range of supporting resources to help schools prepare for the new academic year.

Please be reassured that, **as soon as the final statutory guidance is released**, I will update all of these materials and ensure you have everything you need to prepare confidently for September.

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