



Working together  
to stop child sexual  
abuse online

**NSPCC**



**Save the Children**

**LUCY  
FAITHFULL  
FOUNDATION**



**UK Safer  
Internet  
Centre**



**Childnet**



**Marie Collins  
Foundation**  
Supporting recovery from  
technology-assisted child  
sexual abuse



**SWGfL**  
Safe, Secure, Online

## **UK Alliance Tackling Online CSEA (UK ATOC) response to the UK social media ban**

The UK government is right to be addressing the issue of children's online safety, and improving platform safety is something that we, as organizations committed to tackling online Child Sexual Exploitation and Abuse (CSEA), have long been calling for. We need age-appropriate experiences and a safer internet for all, but no single solution alone will turn the tide against the rise of child sexual abuse we see online.

The threat of online child sexual exploitation and abuse is complex and growing so we are encouraged by the Government's recognition that a social media ban alone is not enough to tackle the harms affecting children online. We know that children may find ways to circumvent restrictions, and there also remains a risk that children may migrate to less regulated spaces online.

Lasting change depends on a comprehensive and system-wide response which begins by introducing interventions that prevent the possibility of harm from happening in the first place, all the way to tackling the revictimisation of those who have been subject to abuse and exploitation. This will require continued commitment from the Government and the regulator Ofcom, but also from tech companies to meet their responsibilities in making online platforms safer by design.

In response to the UK Government consultation, [we presented a package of urgently needed technical and legislative interventions that the Government must introduce to turn the tide on online CSEA](#). These included:

- Greater safeguards for end-to-end encrypted environments which remains a high-risk functionality not in-scope of age restrictions

- Ensuring services are safe by design to stop unsafe products from reaching the market, this principle should apply regardless of whether children will be banned from the service
- Strengthening the Online Safety Act to address existing gaps in legislation and match the original ambition of its introduction
- Fortifying regulatory levers to deliver an effective regime that can meet the ambitions of Government's intentions with a ban

We urge Government to swiftly introduce these measures to help deliver life altering outcomes for children's safety online. The table below outlines our analysis of how the different technical interventions we proposed in our consultation response, including a ban, will impact the threat of online child sexual exploitation and abuse. It is also equally important for these technical and legislative interventions to sit alongside other measures such as specialist support for victims and education for children, professionals, parents and carers.

In June 2026, the UK Government made clear its ambitions to make children safer online and we particularly welcome their decision to introduce nudity detection on children's devices. As we wait to learn more about the details of the proposed legislation, **it is vital that the perspective and meaningful engagement of children, victims, and survivors is central to further policy development.**

Right now, the UK Government has the opportunity to make a real difference in tackling online child sexual exploitation and abuse. It is critical that they get it right and we stand ready to help translate this commitment into meaningful change for children, victims and survivors.

## Intervention table

In our [joint response to the \*Growing up in the online world\* consultation](#) we prepared a table mapping the likely contribution that each of our proposed technical, legislative and regulatory interventions would have on reducing key online CSEA threats. This analysis represented the joint view of the UK Alliance Tackling Online CSEA (UK ATOC), including our assessment on the social media ban. We have updated our analysis of the interventions in light of the announcement made by the UK Government to introduce an under 16 social media ban, as well as restrictions on high-risk features and functionalities.

The table does not suggest that any single intervention is sufficient on its own and the effects will vary depending on a number of technical factors including, but not limited to, service design, age assurance, cross-platform displacement, enforcement and user behaviour.

The relationship between the harm and the intervention is noted based on the level of contribution for tackling the harm. The scale is as follows:

- **Direct** - likely to make a strong and direct contribution to reducing the harm
- **Partial** - likely to reduce the harm to some extent, but not sufficient on its own
- **Enabling** - primarily creates the conditions for other protections to effectively work
- **Limited** - unlikely to materially reduce the harm on its own

Intervention	Primary mechanism	Self-generated indecent imagery	Grooming	Sexual extortion	Known CSAM recirculation and/or sharing	CSAM livestreaming	Key limitations/caveats
--------------	-------------------	---------------------------------	----------	------------------	---	--------------------	-------------------------

<b>Social media ban for under 16s</b>	Restricts access to certain mainstream platforms	Partial	Partial	Partial	Limited	Partial	<ul style="list-style-type: none"> <li>• May reduce exposure on some platforms, but risks displacement to other services like messaging services not in scope of the ban, gaming platforms where most features and functionalities are not in scope of ban, encrypted and potentially adult spaces where CSEA generation and sharing can still occur</li> <li>• Does not directly address adult offender networks</li> <li>• May reduce children reporting harms if they</li> </ul>
---------------------------------------	--	---------	---------	---------	---------	---------	---

							<p>are not supposed to be in those spaces</p> <ul style="list-style-type: none"><li>○ Risk that services treat access restrictions as a substitute for maintaining or strengthening child safety measures for users who remain on their services</li><li>● 16-17 year olds will not come into the scope of the ban, but remain children and so potentially vulnerable to these harms</li><li>● Does not require minimum age</li></ul>
--	--	--	--	--	--	--	---

							enforcement on non-banned services e.g. gaming
<b>Device level nudity detection and blocking on children's devices</b>	Prevents creation, sharing and viewing of nude imagery on child accounts and devices	Direct	Limited	Partial	Limited	Limited	<ul style="list-style-type: none"> <li>• Strongest for child facing image harms</li> <li>• Depends on: (1) accurate age identification, (2) proportional safeguards, and (3) routes for review and appeal where they may be false positives</li> </ul>

<b>Risk-based restrictions on high-risk features and functionalities by age</b>	Limits risky features including stranger messaging and contactability; forwarding; and (potentially) livestreaming	Direct	Direct	Partial (with possibility to be Direct)	Limited	Partial	<ul style="list-style-type: none"> <li>• Depends on robust age assurance and consistent application across services (not just social media platforms in scope of regulation)</li> <li>• Likely strongest when comprehensively targeting high-risk or harmful features that facilitate abuse such as child visibility, gifting, and disappearing messages.</li> </ul>
---	--	--------	--------	---	---------	---------	--

<b>On-device blocking of known CSAM</b>	Prevents access to or storage of known abuse material	Limited	Limited	Limited	Direct	Partial	<ul style="list-style-type: none"> <li>• Stronger for known CSAM than for novel material</li> <li>• Does not by itself address other forms of online CSEA such as solicitation and grooming or wider non-image harms</li> </ul>
<b>Upload prevention/pre-encryption detection of known CSAM</b>	Prevents known CSAM being uploaded or shared which includes encrypted environments	Limited	Limited	Limited	Direct	Partial	<ul style="list-style-type: none"> <li>• Important for known CSAM circulation</li> <li>• Does not by itself address grooming, abuse that is text-based, or newly created/novel imagery</li> </ul>

<b>Effective minimum age requirements and age assurance</b>	Creates infrastructure for differentiated protections and access controls	Enabling	Enabling	Enabling	Limited	Limited	<ul style="list-style-type: none"> <li>• Better understood as an enabling condition than a standalone solution</li> <li>• Effectiveness depends on moving beyond self-declaration alone and using proportionate, privacy-preserving and robust forms of age assurance</li> </ul>
<b>Deterrence messaging and offender signposting</b>	Introduces friction and warnings as well as potential pathways to support for users displaying concerning behaviour	Limited	Limited	Partial	Partial	Limited	<ul style="list-style-type: none"> <li>• Best seen as a complementary prevention and disruption measure rather than a primary safeguarding control</li> </ul>

<b>Regulation of AI chatbots and companion services</b>	Prevents harmful simulation, generation, encouragement or facilitation of abuse	Limited	Partial	Partial	Limited	Limited	<ul style="list-style-type: none"> <li>• Particularly relevant to emerging harms</li> <li>• Government has now proposed an 18+ minimum for romantic companion chatbots and restrictions on similar intimate functionalities for under-18s so clearer duties are still needed around harmful outputs, behavioural encouragement, sexualised roleplay, support signposting and enforcement</li> </ul>
---	---	---------	---------	---------	---------	---------	---