AI-generated image abuse and deepfakes

Scottish Parliament's Criminal Justice Committee Call for Views, November 2026

Children First is Scotland's national children's charity. We stand up for children, keep them safe and support them to recover from trauma and abuse through our national and local services.

"The internet itself is not evil; it is how it is used. Social media can be a space where young people have people they can talk to that share their interests and passions.

"But we are watching childhoods being ripped away because of the way social media is normalising harm and unhealthy expectations. To protect children and young people we must create spaces for them outside social media."

Young person supported by Children First, 18 years old.

We know that online harm is no longer a marginal issue. It is the childhood emergency of our time. Families are navigating challenges that did not exist a generation ago, often without the support they need.

Children are routinely exposed to harmful content, including violent, sexual and exploitative material.[1] Addictive platform design means screen time is at record highs, with clear consequences for children's mental and physical health.[2] It shapes how children learn, communicate and form relationships.

This response has been informed by consultation with children and families across Scotland, through several pieces of participation work that Children First have facilitated in relation to online harm and the digital world, and through Children First's local and national services.

Online harm is one of three policy priorities Children First identified ahead of the recent election, on the basis of the significant harms we have identified in amongst the children and families we support and the potential to do much more across devolved levers of government including justice, health and education to address these issues.

Children describe extreme violent and pornographic content as 'unavoidable' online and exposure often begins in primary school. Algorithms and group messaging fuel this exposure and children tell us that aggressive and sexualised language is being normalised. Many children feel they have no control over what they see and believe that the adults around them either don't know enough or are powerless to do anything about it.

AI-generated image abuse is one example of these kinds of harms, but is a rapidly emerging and deeply concerning issue that risks further negatively affecting societal understanding of norms, consent and appropriate sexual behaviour. In this context, we welcome the Criminal Justice Committee's intention to consider this issue in more detail.

[1] Children's experiences of using online services

[2] Scotland must act now on screen time in the under-fives | University of Strathclyde

Both the UK and Scottish Governments must respond to the scale of challenge with the urgency it demands. We are calling on both governments to:

1. Listen to children and families.

Our response to this consultation has been closely informed by the voices of the children and families we work alongside. Government must also continue to listen to those voices as these policies develop further. Children's real experiences need to be better understood, so they can be better protected.

With the pace of change, and the way in which algorithms deliver divided experiences across the same platforms, children's experiences in online spaces are fundamentally different to the adults around them and are constantly changing. There must be a constant and well-resourced line of communication set up between children and government decision makers to make sure that these policy interventions have the impact intended.

2. Hold tech firms accountable.

It is not enough to simply hope that private companies will act responsibly. Rules need to be enforced, in a way that matches the scale of public concern, and government should not allow firms room to breathe when they blatantly and flagrantly violate children's right to grow up safely in this country.

Ensuring the safety of children and young people online should be a pre-requisite for access to UK markets and the UK population. For apps and platforms to have access to the UK market, they should have proven child safety features beyond doubt.

3. Take a public health approach.

Children First are advocating for a public health approach to tackle online harm, to generate a national, consistent set of messages, advice and tools that can help raise awareness of risks and relieve the individual burdens families face as they navigate it alone. It should also involve investment in safe, physical space alternatives to being online where children can freely spend time and play.

This should focus on prevention at a population level, through raising awareness of risks, sharing clear guidance on healthy digital use, and supporting open conversations about what children are doing and seeing. This should go hand in hand with clearer boundaries around access in places like schools.

Technological interventions should be used to their maximum effect, but as it stands restrictions alone would only be a false promise to children and families. It's not possible to 'ban' social media, and the government must be upfront about this. Restrictions may have some deterrent effect, but they will never be able to limit children's access completely.

Over-stating the potential for age-based restrictions could also have negative knock-on consequences. Children may continue to access risky spaces and features, while being less open about it with the adults they trust. Secrecy and shame are tools often used by perpetrators of harm, as children are told not to disclose harm because they will get in trouble. Meanwhile, adults around children may assume that restrictions mean these problems are under control. This is why Children First are advocating for a public health approach.

Question 1
What are the key issues relating to AI-generated intimate image abuse and deepfakes?

AI-generated intimate image abuse and deepfakes have been increasingly raised as an issue and a concern throughout Children First's services across Scotland.

In particular, we are concerned about the way that children specifically are seeing and engaging with these images and the image generation technology, the way this connects with violence against women and girls and the normalisation of harmful sexual behaviours. There is also a connection with wider misinformation, and the impact this is having on children and families' trust in information sources and those around them.

Children First provided a response to the Scottish Government's consultation on protection of women and girls, where the Scottish Government proposed a new offence on the creation of intimate deepfake imagery. Some of this response is based on that feedback already provided to the Scottish Government, alongside other research we have conducted over the last year informed directly by children, young people and their families.

Specific harms related to children

> ***'BAN – deep fakes, [they are a] risk for children… it also allows for fake information'*. Young person supported by Children First**

The way AI-generated intimate image abuse and deepfake imagery is affecting children should be recognised as a priority issue to address. There is an urgent need for stronger action to curtail the rapidly growing threat posed by AI-generated imagery, particularly where children are depicted, targeted or exposed to such content.

The speed, scale and accessibility of these technologies are creating new opportunities for abuse, exploitation and harm, while making harmful content easier to create, share and distribute. Advances in generative AI have already outpaced existing safeguarding, regulatory and justice frameworks designed to protect children.

Children tell us they are very aware of these emerging technologies, and they are incredibly worried about them based on what they've already seen in their school and social networks.

Children and young people supported by Children First consistently identify deepfakes and AI-generated sexual content as both invasive and frightening. One young person described deepfakes as "a risk for children" while another told us there is already "so much AI generated stuff being dodgy like very explicit sexual content of minors and celebrities. It's very invasive."

Children have also told us that:

- "It [AI] can be dangerous… I think they are called deep fakes or something." Young person
- Another young person recalled that one of her peers edited a girl's picture, which looked like a 'nude' but was 'a pic of fake boobs' which was generated through AI.
- "Avoid using AI as an organisation until there's more regulations." Young person

Young people also shared that AI and Chatbots can be hugely risky, with 'Grok' on X (formally known as Twitter) being the most prevalent for producing harmful content.

We have noted the recent warning issued by the Internet Watch Foundation and the National Crime Agency, alerting parents and carers to the growing threat of children's images being shared online and manipulated into AI-generated child sexual abuse material.[3]

Violence against women and girls

> **"*It feels like no one takes it seriously [sexual assault] and that minor things get brushed under the carpet and no one takes action, but this is what means bigger, worse things will happen later*." Children First Changemakers Group**

Deepfakes must also be considered in the wider context of violence against women and girls. Online spaces are increasingly used to extend and intensify misogyny, sexual harassment and abuse that already exist offline. The creation of sexual deepfakes reinforces attitudes that treat women and girls as objects for consumption and control, while eroding consent and personal autonomy.

Young people have told us that girls often experience what they describe as more 'subtle' harms, where harmful attitudes and expectations are presented as jokes, trends or entertainment but still shape how they think about themselves and others.

Deepfake imagery is a particularly concerning example of this. By creating unrealistic, manipulated or sexualised portrayals of women and girls, deepfakes can distort children's understanding of body image, appearance and relationships. For girls who are already navigating adolescence and developing their sense of identity, confidence and self-worth, repeated exposure to these images can reinforce harmful pressures about how they should look or behave. Deepfakes also contribute to the wider normalisation of the sexualisation and objectification of women and girls, undermining the healthy understanding of consent, dignity and personal autonomy at a formative stage of development.

Online harm against women and girls isn't a new problem—it's an extension of the abuse and discrimination they already face in their everyday lives. The internet is often used to intensify these issues, by extending and exacerbating existing harmful behaviours like grooming or bullying, or to create a new space to perpetrate domestic abuse and sexual assault. Social media and other online platforms are being used to spread and intensify the same gender-based abuse that many women and girls already experience offline. Online spaces can also be used to express problematic attitudes without repercussions: even those that would otherwise be called out and accounted for in an offline forum.

Normalisation of harmful sexual behaviours

> **"*Online harm happens all day, every day more than once*." Young person supported by Children First**

A connected concern relates to the way in which deepfake imagery normalises the sexualisation of individuals without consent. We are increasingly concerned about the way in which boundaries around acceptable behaviour are constantly pushed in online spaces, so that conduct that may have seemed obviously harmful before appears normal to many people now.

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[3] New guidance for parents and carers as AI-manipulated images of children become a growing concern - National Crime Agency

Children are particularly vulnerable. We are increasingly aware of situations where AI-generated sexual imagery has become an issue within schools and communities, with images created and circulated among peer groups. These incidents can have profound impacts on wellbeing, relationships, education and mental health.

Ordinary photographs can be manipulated into realistic, sexualised images in a matter of seconds, creating opportunities for humiliation, coercion, bullying, harassment and exploitation. The harm caused does not depend on whether the image is real. Victims frequently experience shame, distress, fear and a loss of trust and safety, even when a shared image has been artificially generated.

Young people told us that heavily sexualised language and behaviour are normalised online, which appears to be accepted on forums without any challenge. This can then translate into their lives offline, leading to sexualised language and behaviours becoming much more normal at a very young age. Receiving explicit images from both peers and strangers is now 'normal'.

The explosion in the availability of image generation technology normalises the sexualisation of people without their consent, which sets a deeply harmful precedent. While we appreciate there is already an offence in relation to the creation of indecent images of children, harmful imagery – both real and AI-generated – is currently circulating in online spaces on a scale we have never seen before. We are deeply concerned that this will lead to an increase in the perpetration of sexual harms, particularly towards children and in peer-on-peer contexts.

When recent statistics already show a 10% increase in the number of sexual offences recorded by police in the last year, this should be a moment of real alarm for the committee, and justice agencies reporting to it. It should also be an opportunity to introduce specific additional interventions to engage with children who are displaying harmful sexual behaviour. Early intervention support that could help prevent this kind of behaviour is a real gap in Scotland at the moment, and if these kinds of interventions are not available in communities, the criminal justice system will be dealing with the consequences for years to come.

The prevalence of AI-generated imagery, alongside the emerging practice of 'sextortion' (where real or falsified intimate images are used as a device to blackmail children and exploit them emotionally and financially), is incredibly concerning, and an issue that Children First believe needs more specialist resource. We know that this criminal activity, exploiting children sometimes at an incredibly young age, has already led to fatal consequences in Scotland.

There are additional concerns around AI-generated child sexual abuse material. The increasing availability of image-generation tools lowers the barriers to creating abusive content involving children and creates new opportunities for exploitation. The National Crime Agency and Internet Watch Foundation have already warned about the growing use of children's images to generate AI-manipulated child sexual abuse material.

Wider misinformation concerns

> ***'When you're 12, 13 or 14, it's almost impossible to tell what's real and what isn't. You see content about how you should look, how you should live, what you should buy and who you should be. You've got influencers pushing things like weight loss, skincare meant for adults, and ads encouraging you to change yourself before you've even worked out who you are... It affects your confidence and your mental health without you even realising it... And***

the scariest part? You can never be fully sure who you're talking to. Adults have so much access to kids online.' – 18-year-old young person supported by Children First

AI-generated intimate image abuse and deepfakes should also be understood within the wider context of online misinformation and the growing difficulty children, families and communities face in distinguishing between real and fabricated content. As generative AI becomes more sophisticated and accessible, children are growing up in digital environments where manipulated images, videos and information can spread rapidly and be mistaken for reality. Young people themselves have expressed concerns about the volume of AI-generated content appearing online and the wider implications this may have for trust and safety.

> *"There's been a bit of a phenomenon recently on Facebook where it's like really obviously AI generated images, but older people are falling for it and commenting and giving it engagement and stuff. And then recently it's like self-cannibalising itself so basically AI learns stuff on the internet so there's so much AI generated stuff online, so AI is learning from other AI generated things that are incorrect or dodgy. So, it's creating these really random things. I just don't know where it's leading*." Young person

While this observation relates to misinformation more broadly, it highlights a wider cultural shift in which fabricated content is increasingly normalised, shared and believed. Within this context, AI-generated intimate images represent a particularly harmful form of misinformation because they falsely depict real people in sexual situations that never occurred.

The harms are therefore not limited to privacy or sexual abuse. They also involve deception, reputational damage, loss of trust and the erosion of confidence that what we see online reflects reality. Addressing intimate image abuse therefore requires action not only on image-based sexual violence but in relation to the wider ecosystem that enables false content to proliferate online.

Question 2
How effectively do current laws, policies, enforcement arrangements and support services respond to issues associated with AI-generated intimate image abuse and deepfakes?

As we noted in our response to the Scottish Government's consultation on protection of women and girls, reports of the offence of threatening to or disclosing intimate images including images that have been artificially generated have increased by 14% since this consultation was published.[4] This is welcome and shows that the law is capturing some of the harms being experienced.

However, we are not convinced that the existing law sufficiently covers the fullness of the harmful behaviour that the Internet Watch Foundation and the National Crime Agency, as well as Children First's services are reporting.

It is clear that this technology is creating opportunities for further abuse that the current justice system isn't keeping up with, and further deterrents are required. We would therefore welcome consideration of a further offence, more deliberately designed, to deter people from generating sexual images.

[4] Recorded Crime in Scotland statistics, Scottish Government

In addition to consideration of further specific offences around harmful image generation, the criminal justice system must treat online harm with the attention and gravity these acts require. Children First have heard feedback from children who shared that they have received mixed responses when they have tried to report these harms, and sometimes it feels like online harms are not taken seriously enough.

Children First delivered a project as part of the European Union-funded ELPIS research, which promotes excellence in international practice in responding to online child sexual abuse, in partnership with the European Barnahus/Child Houses and the PROMISE Barnahus network. Through this work, we identified a range of challenging feedback about the way that online harm is currently responded to.

The resources that were developed by children through this project included advice to professionals responding to online harm, including police. They shared that:

> "*It's important to remember that we are children, and it may be that we are stressed, confused and upset by what has happened. And no, it's not our fault. So it's important that you listen carefully. Responding sensitively will also help us feel more comfortable talking to you.*
>
> *"No matter how an investigation progresses, please keep us up to date with what is happening. And remember to keep your explanations simple, check we're getting what you're saying without us needing a dictionary. When I met police, I found it really hard to understand some of the words that they used."*[5]

As part of this, appropriate resources will inevitably need to be created to make sure that the system is equipped to take those reports seriously. This would include resources for police, courts, prosecution services and the Bairns Hoose model where children's evidence can be recorded and children and families can be connected with recovery support to help them move on with their lives.

Importantly, children don't just need support to make the initial disclosure of harm, but also recovery support that can offer the space and safety to share further evidence as investigations progress.[6] As justice processes often take years, support for children throughout investigative processes that can help them maintain engagement, as well as recover from harm, is essential.

Police Scotland have already highlighted the demand increases in online child abuse has on the service. Last year, Police Scotland Chief Constable Jo Farrell noted in evidence to the former Criminal Justice Committee that online child abuse reports had more than doubled in a year, with 1,500 reports in 2024-25 compared to 700 in the previous 12 months.[7]

This will include a range of online harms, but we have been clear that every child in Scotland is vulnerable to exploitation, violence and sexual abuse on a scale that has never been seen before and this needs to be recognised in the way that our justice system responds and operates.

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[5] Online harm advice for Police, Children First ELPIS Project

[6] Forthcoming research by the University of Edinburgh on the Recovery Support model.

[7] Police Scotland evidence to Criminal Justice Committee, 5th November 2025

Question 3
What measures, if any, could help prevent, reduce or respond to harms associated with AI-generated intimate image abuse and deepfakes?

> **'There are people who deliberately enter spaces meant for young children – gaming platforms, chats, livestreams – and it's easy for them to hide who they are. Roblox is a good example. They've started bringing in age checks and limiting communication, which is a step in the right direction, but it still doesn't stop everything.' – 18-year-old young person, supported by Children First**

Most importantly, Children First are calling for the Scottish Government to take a public health approach to tackling online harm. We are clear that these harms cannot be reduced through regulation alone, and need a suite of interventions across education, health and justice to make sure children are better protected from the serious online harms they face.

As we set out in our response to the Scottish Government's consultation on protection of women and girls, we believe there should be a review of the existing Sexual Offences legislation to assess it against its capability to catch emerging harms like deepfake image generation where this involves sexualised material without consent, or criminal material.

We are increasingly concerned about situations where children are being exposed to sexual content online and are coerced and groomed into making or sharing harmful and abusive content themselves. It's important that the criminal law fully captures situations where children have been deliberately targeted in online spaces, leading to criminal or potentially criminal interactions in person – particularly Child Sexual Abuse and Exploitation. We are also concerned by increasing reports that children are being encouraged into self-harm and suicidal ideation.

As well as this, we have noted concerns raised by Police Scotland in relation to two specific elements of sexual offending that affects children online, which may not be fully covered under current criminal law.

- Live streaming services have been available to children for many years and are a high-risk feature of many apps and platforms. They are a space where perpetrators can set up direct contact between children and adults who intend to groom or cause harm. Police Scotland have before suggested that there can be a challenge in how offences are structured around harms associated with live streaming.
- Police Scotland have also suggested there are gaps in the law regarding prohibited images of children, including computer generated imagery, and possession of guidance on sexual abuse of children.[8]

We noted correspondence between the former Criminal Justice Committee and the Cabinet Secretary for Justice and Home Affairs where these issues were highlighted and a commitment to considering these issues further was given. We would welcome further clarity on those discussions and would support further offences being brought in alongside those discussed in this consultation to deliver a more comprehensive and workable set of offences available for police to respond to these issues.

[8] Letter to Cabinet Secretary JV regarding 18 May 2022 Evidence Session

Too often, the online world is seen as a safe space for criminal conduct. Perpetrators of harm are using online spaces to extend and amplify abusive behaviour. A significant amount of harmful conduct is being perpetrated within Scotland. It's critical that the online world is not seen as a safe space for perpetrators.

Question 4
Are there any examples, evidence, research, international approaches or emerging developments that you would like to draw attention to?

The manifesto Children First campaigned on ahead of the 2026 election said that online harm is an international problem, which means that there is lots of learning from other countries which Scotland can build upon, particularly from a public health perspective, such as Sweden and Ireland.[9]

In particular, we would draw attention to the work of Ireland's Online Health Taskforce. The Taskforce recognised that online harms should be understood not simply as a technology issue but as a population-level issue affecting children's health, wellbeing, development, relationships and rights. Its recommendations combine regulation and enforcement with prevention, public awareness, education and support for families.[10]

As well as this, Children First have produced a range of resources and research explaining our concerns about online harm, some of which can be found on our website.

Examples include:

- Report on children's experiences of online harm, provided to Ofcom in May 2026: children-first-ofcom-report-may-2026-final-1.pdf
- Response to the UK Government's consultation on growing up in an online world: children-first-growing-up-in-an-online-world-consultation-response.pdf
- Animation, developed by children and young people about online harm: Protect us from online harm
- Online harm advice and support for professionals: Online harm advice and resources for professionals | Children First

As we have said in response to the questions above, children's experiences in online spaces are fundamentally different to the adults around them and are constantly changing.

There must be a constant and well-resourced line of communication set up between children and government decision makers to make sure that these policy interventions have the impact intended.

For further information, please contact Lily.humphreys@childrenfirst.org.uk.

[9] manifesto-2025.pdf
[10] Interim Report of the Online Health Taskforce, Minister for Health publishes the Final Report of the Online Health Taskforce.