Witness Name: DAME RACHEL DE SOUZA

Statement No:

Dated: 9 SEPTEMBER 2026

SOUTHPORT INQUIRY

FIRST WITNESS STATEMENT OF DAME RACHEL DE SOUZA, CHILDREN'S COMMISSIONER FOR ENGLAND

I, Dame Rachel de Souza, will say as follows:

1. Introductory Matters

2. The Office of the Children's Commissioner for England welcomes the opportunity to contribute to the Southport Enquiry. This submission responds to the specific questions outlined in the Rule 9 Request and reflects the statutory mandate of the Commissioner to promote and protect the rights of children in England, particularly the most vulnerable.

3. The office of the Children's Commissioner for England (CCo) is an administrative office that supports the Children's Commissioner for England. It is not a statutory organisation, nor does it have a corporate identity.

4. The Children's Commissioner ('the Commissioner') is a statutory role and is a corporation sole. She is provided with a budget to support this work, which funds the current office of the Children's Commissioner. The Commissioner is an office holder who holds a single term of six years. Reflecting this, as communicated to the Inquiry, it has not been possible to provide information on behalf of previous Children's Commissioners.

Children's Commissioner's Remit

5. The Children's Commissioner has a statutory independent role to protect and promote the rights of children in England and for children around the United Kingdom on issues reserved for the UK Parliament, in accordance with the United Nations Convention on the Rights of the Child. In addition, she is charged with promoting awareness of the views and interests of children, and with having particular regard for children who are living away from home or are receiving social care services.
6. The post of Children's Commissioner was created following the inquiry into the tragic death of Victoria Climbié. The role was initially established under the Children Act 2004 which gave the Commissioner responsibility for promoting awareness of the views and interests of children. The Children and Families Act 2014 further strengthened the remit, powers and independence of the Commissioner, and added special responsibility for the rights of children who are in or leaving care, living away from home or receiving social care services.

7. The Commissioner also operates Help at Hand, an advocacy and advice service for children in care, leaving care, living away from home or working with children's services. Alongside this, In My Opinion (IMO) is a voice for teenagers in care and for care leavers to share their experiences and stories.

8. Legislative Framework

9. The legislative framework for the Commissioner's role includes:
10. **Children Act 2004:** Establishing the Commissioner's responsibilities.
11. **Children and Families Act 2014:** Expanding the remit and powers of the Commissioner, particularly for vulnerable children.

12. Statutory powers in the Children Act 2004

13. Under section 2C, the Commissioner can request a response to recommendations that she has made in her reports.
14. Under section 2D, the Commissioner's powers were extended to providing advice, assistance, and representation to this group of children, and to care leavers up to the age of 25. This role is fulfilled by her Help at Hand service.

15. Under section 2E, the Commissioner has the power to enter settings for the purposes of interviewing children and understanding the care provided to them. This is particularly important for where children are living away from home and in settings such as children's homes or hospitals. These visits directly inform the office's research.
16. Under Section 2F, the Commissioner has the power to request information about children from anyone undertaking a public task. The Commissioner is able to collect, analyse, and publish public data about children to inform her priorities for improving children's lives.

17. The Commissioner is clear that the Children Act was not set up to deal with children who harm others. These children often fall between the intersections of youth offending teams, specialist services like Prevent, children's social care, education and health. This statement will make clear the Commissioner's position that we need a wholesale change in order to accept that these children do need intervention beyond the existing statutory and non-statutory frameworks in England and Wales, and that such interventions should directed through safeguarding arrangements at the first instance, where multi-disciplinary teams can make decisions about what further support and intervention a child may need.

18. The Commissioner's most directly relevant work concerning children exhibiting concerning violent behaviour, Non-Ideological Extreme Violence (NIEV) / Violence Fixated Individuals (VFIs), harmful online content, access to weapons, and safeguarding responses is contained within her recently published report *Children referred to the Prevent programme* (August 2026) (CC01). **CCE000001**

19. The report was informed by statistical analysis of publicly available official statistics *Individuals referred to and supported through the Prevent Programme in England and Wales* published by the Home Office and available online **CCE000002** (CC02). With the exception of time-series analysis, all figures are from April 2024 to March 2025 data tables, published in November 2025.[1]

20. Four additional subsets of the above dataset not previously published were requested from the Home Office using the Commissioner's statutory data powers, received in January 2026.
    20.1. Count of children referred to Prevent by the number of Prevent referrals they had between April 2016 and March 2025.
    20.2. Outcomes of referrals for children who had 3 or more referrals where the third or subsequent referral was after 1st January 2023.

20.3. Sector of referral of those referred, and the stage at which the referral was closed when referred onward.

20.4. Mental Health and Neurodiversity conditions recorded in Prevent Referrals for children by Type of Concern.[2]

21. The report is additionally informed by qualitative interviews carried out by the Children's Commissioner's office in Spring 2026 with six professionals with experience of making Prevent referrals or supporting children who had been referred to Prevent, as well as one adult and one child who had experience of Prevent interventions, all of whom were in England. All professionals consented to recordings being made of interviews and written notes were taken during the interview with a child. Transcripts of interviews were made using AI-assisted software and validated by interviewers then incorporated into thematic analysis. Quotes are used throughout this report, some have been edited for clarity or to maintain anonymity.

22. In respect of the specific categories examined by the scope of phase 2 of this inquiry, the report notes the following:

23. Children exhibiting concerning violent behaviour

24. To inform the Prevent report, the Children's Commissioner undertook a thematic review of children referred to the Government's Prevent programme, focusing particularly on children who displayed a fixation with violence but did not present with a clearly identifiable extremist ideology. The report identifies behaviours including frequent discussion of weapons, fascination with mass casualty attacks, idolisation of perpetrators of violence, sharing violent or graphic content, encouragement of self-harm, and participation in harmful online communities.

25. Additionally, the report analysed referral pathways, outcomes and safeguarding responses for these children, concluding that many were presenting significant concerns that warranted intervention even where they did not meet counter-extremism thresholds.

26. The Commissioner recommends a stronger safeguarding framework that would assess and respond to the underlying vulnerabilities and risks associated with violent behaviour rather than focusing solely on ideological radicalisation.

27. Non-Ideological Extreme Violence (NIEV) / Violence Fixated Individuals (VFIs)

28. The Children's Commissioner recognises the term Violence Fixated Individuals (VFIs) and uses this term throughout the Prevent report to describe someone without a clear and fixed ideology, but who nonetheless has become obsessed with violence and harming others. The Commissioner has noted this cohort has

more recently been referred to as 'Nihilistic Violent Extremists' but has not adopted this term. The Commissioner notes that terminology is a challenge in this space, and that a single recognised term would be a useful tool across children's services to assist in identifying and supporting this cohort of children.

29. The findings of the data gathered for the Prevent report found that a significant proportion (71%) of the group of children referred to Prevent had no fixed ideology and were therefore categorised as VFIs. These children were not associated with Islamist, right-wing or other identifiable extremist ideologies, but instead demonstrated a fascination with extreme violence, weapons, mass casualty attacks or violent online material. On receiving this data, the commissioner determined that the Prevent report should primarily focus on how public bodies response to the VFI cohort. The report sets out that this cohort as a significant safeguarding concern and concludes that existing arrangements risk leaving such children without effective assessment or support.

30. However, through discussion with those working with children with ideologies, it emerged that these can often be changeable and unfixed. There may not aways be a completely clear line between ideological and non-ideological children. This is one of the reasons that the recommendations about a new pathway must apply to all children at risk of committing violence.

31. The report highlights the need for reform so that children presenting with violence fixation receive a multidisciplinary safeguarding assessment through local safeguarding arrangements involving, where appropriate, Counter Terrorism Policing and other statutory partners.

32. Children's exposure to harmful online content

33. The Prevent report identified exposure to harmful online content as a major factor in referrals involving violence-fixated children. The report highlights concerns regarding exposure to violent videos, beheading footage, suicide-related material, extreme pornography, harmful online communities and content glorifying violence or attackers.

34. For further information and the Commissioners recommendations with regard to online harms, please see the section entitled ***The role of the online environment*** later in this statement.

35. Children's access to knives or other offensive weapons

36. Through the work carried out for the Prevent report, the Commissioner has identified discussion of weapons and repeated interest in weapons as common features seen among some violence-fixated children referred to Prevent. Examples provided include children frequently talking about weapons and

expressing fascination with violent attacks.

37. While the work of the Commissioner has not specifically examined children's access to knives and offensive weapons, she has included in her recommendations that the Children Act must be amended to make clear that any child at risk of harming others should be met with a safeguarding response. The Act should be accompanied with statutory guidance which includes risk factors which should prompt this response, including an interest in procuring weapons.

38. Safeguarding responses to children who pose a risk to others

39. A central finding of the Commissioner's work was that current referral pathways often fail to provide an effective safeguarding response for children who present risks to others but do not satisfy Prevent thresholds based on ideology.

40. Data collected by the Commissioner for the Prevent report has shown that large numbers of children referred by schools and colleges were returned to education settings after Prevent closure without receiving further intervention. This creates a risk that opportunities for prevention, safeguarding and risk reduction are missed.

41. The Commissioner recommends that responsibility for such children should be embedded within local muti-agency safeguarding teams, with coordinated involvement from education providers, children's services, health partners, safeguarding partnerships and Counter Terrorism Policing where appropriate or necessary.

Identifying Risk

42. The conclusions made by the Prevent Report are clear, existing counter-terrorism mechanisms for supporting violence fixated children with no specific ideology demonstrate a concerning risk that services can too-easily become overwhelmed or fail to meet the needs of children in this category as the interventions were not designed for them. There is a group of children who were referred to Prevent multiple times, which demonstrates this concern. As the report sets out, in the ten years between April 2016 and March 2025, 91% of children were referred once, and the remaining 9% (1,136 children) were referred at least twice. Approximately 1.5% of children corresponding to 187 children over the 10-year period were referred 3 or more times.

43. Additionally, the report shows, the majority of children referred to Prevent have their cases closed and do not progress to an intervention. Of the 4,715 Prevent referrals for children between April 2024 and March 2025, 21% had their case discussed at panel and 18% had their case adopted by Channel. 79% were closed without progressing through the Prevent programme. Children with no

ideology are more likely to have their case closed without being discussed at panel. 86% of referrals for children with no clear ideology are not progressed to panel discussion, compared to 60% of those with a clear ideology.

44. The report recommends that the Home Office and Department for Education should issue joint statutory guidance on children who pose a risk to others. This should require that all children where there is a concern that they might commit violence or other forms of harm – because they are violence fixated, drawn into terrorism, or because of concerns about criminality – are referred to the Multi Agency Child Protection team in the child's local area. The Commissioner has called for shared statutory guidance to support this process.

45. This should build on learning from areas which have introduced parallel referral pathways, where children are referred to Prevent and local authority safeguarding teams simultaneously. These assessment teams should act as a 'triage' for all these children, including drawing on expertise from counter-terror police at the initial assessment stage when concerns about terrorism are identified, and then children should be allocated to the appropriate intervention from there.

46. The Children's Commissioners work on VFI's has not examined the literature or conducted first-hand research on the factors which lead to a child becoming violence fixated, however the Commissioner fully supports any steps the inquiry takes to review this literature and to consult experts in this space to inform the final report and recommendations. It would be additionally useful to examine how children become drawn to other harmful behaviour, such as child criminal exploitation, in order to identify potential shared learnings and cross-over interventions. In the Prevent report, the Commissioner additionally recommends that The Youth Endowment Fund should be funded to support the Home Office to build the evidence base on the effectiveness of interventions for children at risk of committing serious violence with and without fixed ideologies.

47. Furthermore, the Commissioner recommends that a national database of evidence-based interventions for children at risk of harming others be established, including for children who are fixated on violence, but who do not have an ideology. All local authorities should establish a pathway and a set of these evidence-based interventions for children at risk of harming others. This should include close working with Youth Justice Teams to carry out preventative work with children. Children should continue to be progressed to Channel interventions if that is assessed as being the most appropriate intervention for their needs.

48. The Children's Commissioner does not consider that at present practitioners receive sufficient training to identify violence fixation and indicators of escalating risk of violence towards others. Professionals interviewed for the Prevent report reported a high degree of variation in expertise and approaches to identifying and referring children between Local Authority areas:

> *"I think it would be really helpful in terms of Prevent to be consistent, I think, but it's the same in the whole of the country, nothing's ever consistent. In terms of services and things like that, but I just feel that even across the border from [area] to [neighbouring area], there's so much difference in terms of the training that professionals get from the Prevent team and the support and information."*

> *"because we've just done Prevent self-assessments across all of our schools, we sit across [a number of] local authorities and the support that you get from one authority to the next really differs. And I don't think that's right that that should happen. I think that every, you know, everybody should get the same level of support, no matter what area or postcode that you're from."*

49. The effectiveness of the process was driven by the strength of relationships, in particular with individuals in the Local Prevent coordinator roles:

> *"So I think there was the relationship with that particular Prevent coordinator. Wasn't great with the establishment that we were working with as well, which didn't help*. "

50. One safeguarding lead had escalated their concerns through the Department for Education regional lead after referrals had been repeatedly closed with no further action through local Prevent pathways.

> *"So that was the discussion around the escalation really around the fact that we had referred him in to Prevent that it had been unsuccessful or they're not going anywhere and maybe professionals were not understanding the risk that we were seeing in school. So that was the reason that we escalated it to our friend in the DfE, [name], who's the [region] lead for Prevent. She's got a lot of knowledge and a lot of expertise and a lot of connections. So one of the things that she did was helped us to complete a risk assessment for him. But obviously that was escalated then through the right channels here locally, which was really, really useful."*

51. The Commissioner is clear that updated, and frequently revised, training should be provided to education and health professionals and others who might refer children, to clarify which children should be referred and how referrals should be

completed. Additionally, the Department for Education should review Working Together to Safeguard Children to make it clearer that risk of committing violence or harm to others should be a reason for a safeguarding referral to be made and for support to be offered.

52. Information Sharing

53. The Children's Commissioner has long called for better information sharing across the services which work most closely with children. When information about a child's safety or welfare is not shared effectively, they can fall through the gaps due to a lack of knowledge sharing between children's services. This is particularly the case for vulnerable or complex children, such as those who may be referred to Prevent.

54. A lack of knowledge and data sharing across services is something that came to light during the Commissioner's work on the independent Family Review (CC05) **CCE000004**. Time and again, children and families across the country told her that they wanted the services they access to talk to each other. Often, this is because they don't want to have to repeat their stories – which can be both frustrating and distressing. It was clear that a lack of data sharing leaves families feeling unclear about what professionals do and do not know and can make it harder to access the support they need.

55. More recently, respondents to the Children's Commissioner's surveys The Big Ambition and her current The Big Future have made similar points:

> *"Link all the schools and clubs together so that they all talk to each other properly and can help young people better." – Parent of boy, 4, The Big Ambition*
>
> *"Make sure that everybody is looked after and get to know the child" – girl, 13, The Big Future*
>
> *"look more into kids/teens learning and life at home and find out what they need help with and how they can help." – boy, 13, The Big Future*

56. Too often, the potential benefits of data sharing are going unrealised because it isn't happening. Recent research shows that there is limited linking of health, educational and social care data on children by local authorities in England **CCE000005** (CC06). Indeed, fewer than half of local authorities reported that they were linking data on all children in the local authority area.

57. In July 2026, the Department for Education consulted on new proposed statutory information sharing guidance. The Commissioner responded to the consultation in full and will provide a copy of this response to the inquiry (CC03). In the **CCE000003** response, the Commissioner welcomes the move from non-statutory to statutory

guidance and the steps the proposed guidance takes to make clearer the obligations on professionals with regard to sharing information about a child.

58. The Commissioner has long called for the implementation of a Single Unique Identifier for children (SUI), as a necessary and important step in helping professionals to share information and provide holistic support for children. Implementing a SUI would improve data matching, allowing professionals to ensure they are seeing the correct information about a child when they interact with them. A common issue, including in the case of the subject of this Inquiry, is that different spellings of names may be used to log information about a child, or to request information about a child from another body. A numeric SUI avoids the need to use the child's name, thus reducing this risk.

59. There are additional systemic benefits to information sharing. As a part of the work on the Prevent report, the Children's Commissioners office was not able to analyse any cross-cutting details about referrals, for example whether the child referred also had a children's social care referral. The introduction of more effective information sharing practices such as a SUI would allow researchers to better understand how systems are working together and what could be improved.

60. Multi-Agency Working

61. The Children's Commissioner recognises that children who are referred to Prevent, particularly the majority who are referred with no ideology, do not sit fully, or only, within Prevent's purview. Children's social care services in England also have a clear duty, set out in Working Together to Safeguard Children, to safeguard children from harm, and that includes extra-familial harms such as being drawn into criminal behaviour including serious violence. Youth justice services have a duty to support any child who has been cautioned or sentenced to address their behaviour, including if that child has committed serious violence. Violence Reduction Units, in the areas they exist, work with children who are at risk of committing serious violence; Youth Futures Hubs will also move into this space. Forensic CAMHS services are specifically set up to work with children who are at risk of offending or causing harm to others.

62. Likewise, while Channel panels are set up to be multi-agency decision making bodies, these are far from the only multi-agency decision making bodies who will need to be involved with these children. Every local area must have a multi-agency safeguarding arrangement which includes local authorities, police and health; equally every area must have multi-agency public protection arrangements (MAPPA) including police, probation, youth justice; there is also, along with the Prevent duty, the Serious Violence Duty, which requires local agencies in England and Wales to work together to tackle serious violence.

63. There is an inherent risk of having so many potential decision-making bodies and individual services who are each required to take responsibility for children who may have very similar and overlapping needs and risk profiles is that it is not clear who should lead a response and take on that responsibility. Additionally, if children do not quite meet the threshold for any one service but have a high level of need across several domains, they may miss out on support altogether by failing to fit into a single service model. It can also make for a complicated referral process – in some areas, children referred to Prevent should also be referred to children's social care, but this is not universally the case.

64. Professionals with experience of making Prevent referrals interviewed by the Children's Commissioner's office agreed that it was often difficult to know when they should be referring children to Prevent and why, and that there were other similar services that might also be relevant:

> *"[…] I feel that with Prevent it's more difficult to explain […] I know a lot of young people and a lot of vulnerable adults don't know what Channel is and we wouldn't expect them to, but I think they don't know the process of Prevent and I think sometimes it would be really good to have a piece where we say we're going to inform social services or we're going to inform the local authority or we're going to inform the local police. And we give them the reasons […] is it because we want them to help you or is it because we think that you're going to be a terrorist or is it because we think that you're going to get in trouble or is it because we think you're a victim"* – Safeguarding lead at an education setting.

65. Data from Children's Social Care on factors identified at the end of assessment of children in need does not include categories for concerns that a child may commit violence; 35,980 assessments last year included 'socially unacceptable behaviour' as an identified factor. But it is impossible to understand from any published data how many children referred to Prevent are also being referred and assessed by children's social care.

66. Some education settings reported that their school or trust policy is to make MASH referrals alongside Prevent referrals but it appeared that education settings were often the service most involved with vulnerable children they referred to Prevent and so were providing much of the day-to-day support and intervention as well as managing most of the risk around children's dangerous behaviour.

> *"They [social care] were batting it back to you a number of times and going, no, it doesn't meet the threshold and you're raising these concerns constantly. You've just got to keep adding and adding [to referrals] because you know*

you're working with the children, you're working with the families, you know things are not right and you've just got to keep putting it in and putting it in." – Safeguarding lead at an education setting.

67. One safeguarding lead at an education setting gave an example of a young person who was not being adequately supported by social services, at the same time as escalation of their extremist beliefs and behaviour, while living unsupervised in an unsafe environment.

"I found it very interesting that the social worker had been assigned to this person for, I think, probably getting on for a year, but never been in the property [which contained weapons]." - Safeguarding lead at an education setting.

68. A different safeguarding lead spoke about a child with social care involvement, whose extremist behaviour appeared to be getting worse, suggesting this was not effectively safeguarding him.

"He's currently on a CP, which is Child Protection, and since he's been on that, it's actually escalated more than anything. Parents are not attending meetings. So it's been quite a quite an intense caseload." – Safeguarding lead at an education setting.

69. Thresholds for each of the multi-agency safeguarding structures should be applied consistently and remain independent of resourcing concerns. Safeguarding leads interviewed by the office raised concerns that this is not the case:

"They've only got a certain amount of staff, they've only got a certain amount of resources. So, they would look at the most serious cases and they will prioritise their cases... So, when you think about it, we're coming from the bottom and they're coming from the top. So, when you get to the middle bit, it is a bit of a grey area" - Safeguarding lead at an education setting.

70. The Children's Commissioner would support the creation of a 'big front door' model in which all children where there is a concern that they might commit violence or other forms of harm – because they are violence fixated, drawn into terrorism, or because of concerns about criminality – are referred to the Multi Agency Child Protection team in the child's local area.

71. This should build on learning from areas which have introduced parallel referral pathways, where children are referred to Prevent and local authority safeguarding teams simultaneously. These assessment teams should act as a 'triage' for all these children, including drawing on expertise from counter-terror

police at the initial assessment stage when concerns about terrorism are identified, and then children should be allocated to the appropriate intervention from there.

72. In the long term, the Department for Education should introduce legislation to amend the Children Act to set out how harm from outside the home should be tackled. The Children Act, and children's social care more broadly, were historically set up to address intra-familial harm. As a result, there is often a lack of clarity and specificity with regard to extra-familial harm.

73. The Department for Health and Social Care's mental health strategy must also include a specific strand of work on children, which should include clear pathways for neurodiversity, a shared outcomes framework to establish the effectiveness of interventions, and pathways for children with trauma who currently fall between gaps of health and children's social care.

74. This model would ensure that the most appropriate single agency is responsible for leading a child's case, drawing on additional support from other relevant sources and stop children who are at risk of committing violence falling through the gaps.

75. Interventions

76. The Children's Commissioner's Prevent report does not examine the effectiveness of the interventions delivered, either for children with a fixed ideology or those without one. However, individuals interviewed for the report did express mixed views about the intervention providers.

77. One individual interviewed by the office spoke highly of the mentoring they had received through Prevent:

> *"I actually got de-radicalised through the Prevent programme. […] Me and my Prevent IP got along really, really well. You know, we had very similar upbringings, a lot of similar common interests as well. And because of that, I could really relate to him, which made it a lot easier for me to be able to open up to him. I worked with him probably for around about two months […] You know, there's a famous quote that says, once you've had your eyes open to the truth, it's very hard to be blinded again. And that's exactly what happened to me."* – Individual with experience of Channel Intervention

78. However, another interviewee felt that mentoring had not changed their views by the time the sessions ended.

> *"They just said they won't see me no more, said I can't be helped […] He tried to change my mind and my mind won't change"* - Individual with experience of

Channel intervention.

79. However, given the intervention model relies on experts with deep knowledge or lived experience of an ideology working directly with an individual it is critical for future research to consider whether this model is appropriate or relevant in cases where the individual has no specific ideology to address.

80. The Role of the Online Environment[3]

81. The Commissioner has called for stronger action to be taken to address the online drivers of radicalisation. The UK Online Safety Act 2023 does not give agencies sufficient powers to require online platforms to detect online behaviours linked to fixation or pre-planning an attack. The Act is designed to deal with illegal and harmful content, which means platforms' obligations cover content management and risk mitigation, rather than monitoring concerning behaviour. Under the Act, terrorist content is priority illegal content (CC07). A platforms' obligation is to mitigate and manage the risk of harm from illegal content by risk assessing for harm caused by content through the role of the service, its design and the way it is operated. CCE000006

82. Platforms must then put in place safety measures to mitigate the risks that are identified in their most recent risk assessment. Platforms also have to have a system in place to respond to illegal content where it is discovered, although there is no duty for platforms to search for illegal content on their sites. The Act is therefore limited in its capacity to address new and emerging forms of extremism online, and also to require companies to monitor for preparatory behaviour. A child is not radicalised by viewing a single piece of content. Rather, a child who is exposed over time to incremental increases in load and severity of content of increasingly harmful types result in a risk of radicalisation which the Act does not have the scope to address.

83. The Commissioner has called for the Act to be amended to add radicalisation content as an additional content category to the illegal content (section 59). The Commissioner has also called for incidents of platform contribution to a Terrorist offence to be used as an outcome measure to assess platforms' compliance with their safety duties under the Online Safety Act.

84. In conversations the Commissioner has had throughout her tenure as Children's Commissioner, children have reported concerns about the effectiveness of the reporting mechanisms they have for harmful online content and experiences on technology platforms. Analysis from *The Big Ambition* survey of 253,000 children found that almost a third (30%) of children in England did not know how to report harmful content when they saw it online, and a further 25% explained that they

CCE000007 did not know they even could (CC08). The survey was carried out before the Act came into force, and technology platforms now have an obligation to give users the ability to report harmful and illegal content.

85. In conversations since the Act came into force, however, children indicated that they still see no action being taken as the result of their reporting harmful content. Beyond the technical reporting issues, children also have voiced to the Commissioner their difficulties in reporting struggles to the adults around them. In discussion groups for the Commissioner's guide for parents to help them support children's online lives, children said they would not speak to their parent or guardian if something bad happened online (CC09). Not believing that anyone CCE000008 will help them, or that anyone understands their experiences, is a significant barrier to children asking for help when something goes wrong online.

86. Online platforms, including mainstream social media companies, are designed to retain users' attention for as long as possible, often in order to increase their revenue from advertising. The use of personal recommendation algorithms ('algorithms') allows platforms to target users with content that the platform predicts will interest them most. These predictions are based on data that has been gathered from user actions on their sites, including what types of content users engage with and when. The more a user engages, the more advertisements they see, and the higher the ad revenue is for that platform. This is called behavioural advertising, and it is a process that plays a significant role in what types of content a user sees and when.

87. If a user expresses an interest in violence, for example by 'liking' a post with a specific theme or clicking on the hashtag link to see more of the same kind of content, the platforms gathers this data as a signal that this is the type of content a user is most interested in. It will then serve more of the same, and often of increasing extremity in order to retain a user's attention. Behavioural advertising incentivises online platforms to use these types of algorithms. It is a business model that increases the risk of users seeing and engaging with harmful content, especially when many types of harmful content are designed to induce extreme reactions such as shock and outrage. These feelings often cause a user to linger on content types and signal to the platforms that they are interested in content.

88. The radicalisation risk is therefore high – the more violent content a child sees or engages with, the more they will be targeted with that kind of content, which in turn increases their chances of engaging with it, in a vicious cycle.

89. The online world is now widely understood as central to the radicalisation process for children and young people. The Independent Reviewer of Terrorism Legislation found not only that the vast majority of individuals who were

convicted of terror offences were radicalised online, but also that the role of the online world in radicalisation could not be understated and was moving at a pace that far outstrips the existing law (CC10). **CCE000009**

90. AI generated content, data and monitoring

91. The proliferation of AI generated content, which can be more rapidly adapted to user's views in order to retain their attention, adds further risk and are increasingly features of online disinhibition, anonymity and harmful content platforms. When examining this topic for the Prevent report, one psychology practitioner with experience working with children referred to Prevent said:

> "*They find what they can't find in school, they find through an online community, a faceless online community, people there who probably pretending they're teenagers and are not teenagers, as we 19 know, and they go down a sort of a rabbit hole [...] and they can find places like the Dark Web and Discord and all of those websites, which absolutely pummel this stuff out and they tap into it and then suddenly someone's making them feel good online'.*

92. Many of the most commonly used mainstream online platforms, including social media platforms and gaming sites, collect behavioural data from users. Behavioural data points include location, page views, clicks, searches, app sessions, dwell time and content engagement.

93. Virtual Private Networks (VPN's)

94. Some children may use a Virtual Private Network (VPN) to bypass restriction settings and access age-restricted content. The use of a VPN is not in and of itself a red flag for concerning online behaviours. There are a number of legal and valid reasons a child might want to preserve their privacy online. A VPN is also not a barrier to an online platform identifying when a user is displaying harmful online behaviour. Data can be collected that suggests a user is using a VPN – for example, VPNs relocate a user's IP address to a fixed point in another country, which means that VPN users will likely share the same IP address. Multiple users all sourced from the same fixed spot is highly suggestive of a VPN.

95. VPNs additionally do not cover other data trails – for example, the time of day that a user is on a platform (if it is outside of school hours, for example), the language any search terms are made in, the substance of those search terms (using childlike language or slang terms popular among younger people, for example) - all these data points gathered together can still indicate whether or not a user is a child. This data can also be used to estimate if a user is engaging in harmful online behaviour – if they are seeking out harmful content or are

attempting to bypass online restrictions using a VPN when they are likely to be a child.

96. VPNs still leave data trails that can be collected and used to assess if a user is likely to be a child. In the case of pornography sites (Part 5 services of the Online Safety Act 2023), the Act requires Part 5 services to put in place Highly Effective Age Assurance (HEAA) to ensure that their sites are not normally accessible to children. Ofcom has stipulated that HEAA must be accurate, NHSW000036 robust, reliable and fair (CC11). The Commissioner's view is that if a child is able to bypass a HEAA system using a fairly predictable tool like a VPN, then the age assurance method chosen by that online platform has failed and can no longer be viewed as Highly Effective. This then becomes an enforcement problem of the Online Safety Act. With this provision already in place, it is not proportionate to restrict children from using VPNs, which are tools with multiple uses.

97. The Children's Commissioner has called for children's use of VPNs to circumvent existing rules and regulations to be monitored (CC12). In nationally CCE000011 representative polling of UK 13 to 17 year olds carried out by the office in April 2026, only 20% of children said they used VPNs. This is a relatively low number. Of those who did use a VPN, the most common reason children said they used them was to stream media from other countries (45%), access websites not available in the UK (35%) and bypass age restrictions (18%). Accessing a pornography site is an activity that would fit in each of these three categories, and so the Commissioner recognises that the risk of children using legitimate tools to bypass rules and regulations is as real online as it is in offline environments. However, the Commissioner has previously said that VPNs themselves are not a barrier to online platforms and Ofcom enforcing these age restrictions (CC13). NHSW000045

98. The Social Media Ban

99. The government has announced that there will be a restriction on under 16s accessing certain social media platforms. In separate announcements, the government has also announced that some platforms with harmful features and NHSW000044 functionalities will also face restrictions (CC14). The criteria and implementation plan for these announcements are still being developed.

100. The Children's Commissioner called for a social media restriction to be put in place as an emergency measure until technology companies can provide evidence proving that they are safe for children, including proof that they are safe from design features and functionalities that put children at risk of CCE000014 perpetrating harmful online behaviour (CC15). Noting the risks inherent in behavioural advertising business models, which was cited in the Commissioner's initial response to Ofcom's protection of children code consultation (CC16), and CCE000007

noting that the Commissioner has since expressed concern that these risks have not been adequately addressed in Ofcom's regulatory codes (CC17), the Commissioner considers it appropriate for some additional action to be taken to restrict child users who present a risk to others. This is because the business model is likely to facilitate an escalation of those concerning online behaviours. CCE000015

101. It is the Commissioners view that online platforms must prove that they are safe for children before they can access them. As a part of this, platforms must show they will not allow children to experience or perpetrate harmful online behaviour.

102. Improvements and recommendations

103. Where relevant, the recommendations set out by the Children's Commissioner as a part of the Prevent report have been highlighted throughout this witness statement. However, the recommendations were crafted to be read as a cohesive suite and therefore are set out in their entirety in the following paragraphs.

104. In addition, the Childrens Commissioner published the Childhood Lottery report on 19th October 2026, which sets out a series of recommendations about how devolution can address concerns about children who are fixated with violence or at risk of harming others (CC18). These supplement the recommendations in the report about children referred to Prevent, with a particular focus on how statutory duties should operate at the strategic authority level. The range of working together duties – including on safeguarding and serious violence – should be reviewed to ensure that wherever appropriate it is strategic authorities who are required to work together with other agencies. CCE000018

105. Tackling online drivers of harm

106. Recommendation 1: The government should restrict technology companies from accessing children, until they are able to prove that they have measures in place to protect them from harm – covering both protections on seeing specific types of content, as well as protection from features that increase the risk of encountering that content – such as curfews, no advertising, no recommended content, no ability for constant scrolling, and no ability to be contacted by strangers. This must cover not only social media platforms, but gaming, AI chatbots, image generators and messaging services too.

107. Recommendation 2: Ofcom should assess regulated services' compliance with their safety duties by an outcome measure. This means that if a child is convicted of a terrorism offence where it is found that engaging with content on a

regulated service contributed to the commission of their crime, that platform's compliance with their safety duty should be reviewed.

108. Recommendation 3: Online platforms should be required to complete a risk assessment for the risk of radicalisation or violence fixation. The risk of radicalisation or fixation on violence on online platforms requires a system-wide assessment of how features such as algorithms contribute to a child's behaviour. It is essential that these risk assessments are fully transparent, and counter-terror police should be added to the list of relevant bodies who are able to access these risk assessments under s393 of the Communication Act.

109. A new pathway for children at risk of committing violence

110. Recommendation 4: The Home Office and Department for Education should issue joint statutory guidance on children who pose a risk to others. This should require that all children where there is a concern that they might commit violence or other forms of harm – because they are violence fixated, drawn into terrorism, or because of concerns about criminality – are referred to the Multi Agency Child Protection team in the child's local area. This should build on learning from areas which have introduced parallel referral pathways, where children are referred to Prevent and local authority safeguarding teams simultaneously. These assessment teams should act as a 'triage' for all these children, including drawing on expertise from counter-terror police at the initial assessment stage when concerns about terrorism are identified, and then children should be allocated to the appropriate intervention from there.

111. Recommendation 5: A national database of evidence-based interventions for children at risk of harming others must be established, including for children who are fixated on violence, but who do not have an ideology. All local authorities should establish a pathway and a set of these evidence-based interventions for children at risk of harming others. This should include close working with Youth Justice Teams to carry out preventative work with children. Children should continue to be progressed to Channel interventions if that is assessed as being the most appropriate intervention for their needs.

112. Recommendation 6: The Department for Education should review Working Together to Safeguard Children to be clear that risk of committing violence or harm to others should be a reason for a safeguarding referral to be made and for support to be offered.

113. Recommendation 7: Updated, and frequently revised, training should be provided to education and health professionals and others who might refer

children, to clarify which children should be referred and how referrals should be completed.

114. Recommendation 8: The Youth Endowment Fund should be funded to support the Home Office to build the evidence base on the effectiveness of interventions for children at risk of committing serious violence with and without fixed ideologies.

115. Recommendation 9: In the long term, the Department for Education should introduce legislation to amend the Children Act to set out how harm from outside the home should be tackled.

116. Working with health

117. Recommendation 10: The Department for Health and Social Care's mental health strategy must include a specific strand of work on children, which should include clear pathways for neurodiversity, a shared outcomes framework to establish the effectiveness of interventions, and pathways for children with trauma who currently fall between gaps of health and children's social care.

118. Improving data

119. Recommendation 11: The Department for Education should roll out the consistent childhood identifier without delay to all children, whether or not they are in contact with social care, in order to ensure that opportunities for sharing data and information are not lost.

120. Recommendation 12: Local Prevent and policing should improve their data recording, with a standardised approach overseen by Counter Terror Police and Home Office so it is possible to track children through the system to understand how many are referred, and exactly what the outcome of their referral is.

121. Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings many brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: **Signature**

Dated: 19.10.2026

[1] April 2025 – September 2025 data was published by the Home Office in August 2026, but this has not been included in the analysis. The 2024-25 data was selected as it is the most recent full financial year of data available and aligned with the additional cuts provided by the Home Office. 6Home Office were also asked for but unable to provide the number of Prevent

[2] Home Office were also asked for but unable to provide the number of Prevent referrals for children split by whether they had an Education, Health and Care Plan at the time of referral, and by type of children's social care involvement at the time of referral.