



Companion Guidance for Affiliated Clubs, Surf Schools and Coaches

Crime and Policing Act 2026

Guidance from Surfing England

The Crime and Policing Act 2026 introduces a few important safeguarding changes for organisations working with children and young people in England and Wales. These changes apply across all sport and recreation settings, including surfing.

The government specifically referenced sports volunteers when developing the Act, recognising that many grassroots activities rely on coaches, parents and volunteers to provide opportunities for children and young people. While the Act is intended to strengthen safeguarding and support earlier intervention, it also creates new legal responsibilities that surf clubs, surf schools, coaches, welfare officers and governing bodies need to understand.

This companion guidance has been prepared by Surfing England to support affiliated organisations in understanding the key changes and considering any updates required to local safeguarding arrangements. It is intended to complement existing safeguarding procedures and should be read alongside organisational safeguarding policies and statutory guidance.

1. Mandatory Reporting of Child Sexual Abuse

A significant change introduced by the Act is a statutory duty for certain individuals undertaking regulated activity, such as surf coaching among others, with children to report child sexual abuse when they become aware of it.

This includes circumstances where an individual becomes aware because:

- a child discloses abuse directly;
- a perpetrator discloses abuse;
- the person witnesses abuse themselves.

A report must be made to the police or local authority as soon as reasonably practicable to reduce the risk of further harm.

In exceptional circumstances where immediate reporting may create a direct risk to the child's life, reporting may be delayed for a short period to manage that risk safely, but for no longer than seven days.

What this means for coaches and volunteers in practice

For most surf coaches and volunteers, the day-to-day process should still feel familiar. Existing safeguarding procedures should remain the first route for reporting concerns.

This means that if a child shares a serious safeguarding concern with a coach, volunteer or welfare officer, the person should continue to follow the club or surf school safeguarding procedure, which will usually involve informing the designated safeguarding lead or welfare officer immediately.

The key legal change is that the person who reports the disclosure must not assume the concern has been addressed. They must make sure a formal referral to the appropriate statutory agency has been made, or will be made without delay.

- listen and respond appropriately to the child;
- record what has been disclosed as soon as possible;
- report the concern through the organisation's safeguarding process immediately;
- ensure the designated safeguarding lead or relevant person has taken forward the referral;
- if there is any doubt that this has happened, take further action yourself.

Reassurance for volunteers

This does not mean every volunteer is expected to independently contact the police each time a concern is raised.

The Act recognises that organisations have safeguarding structures in place. Volunteers and coaches should still use those reporting routes.

The key point is that if you are the person who receives the disclosure, you retain a personal responsibility to make sure the concern reaches the correct authority. Passing information on is part of the process, but it should not end with an assumption.

Example

A young surfer tells a coach after a lesson that they are being harmed at home. The coach informs the club welfare officer and completes the club's safeguarding report form.

This is the correct first step. The coach should also be satisfied that the welfare officer has taken the concern forward through the appropriate statutory reporting route. This may be as simple as receiving confirmation that a referral has been made. We advise to get this confirmation in writing, so you are satisfied it has been appropriately reported.

In most cases, the club's normal safeguarding procedure will still be the correct route to follow. The Act reinforces that concerns must not stop at an internal conversation and must reach the appropriate external agency where required. We advise to always get written proof that a referral has been made, and appropriate procedures followed.

2. Failing to Report and Obstructing a Report

The Act distinguishes between failing to make a required report and deliberately preventing someone else from making one.

Failing to make a required report

Failure to report is not a criminal offence. However, an individual may be referred to the Disclosure and Barring Service (DBS) and, where relevant, to their professional regulator. This could result in the person being barred from working or volunteering with children.

Obstructing a report

Deliberately preventing, delaying or discouraging someone from making a required report is a criminal offence. This applies to any person, regardless of role or seniority, and may result in a prison sentence of up to seven years.

Example

If a senior club volunteer instructs a welfare officer not to escalate a safeguarding concern until after a competition or major event, this may constitute criminal obstruction under the Act.

3. DBS Checks and Supervised Volunteers

The Act removes the supervision exemption from regulated activity.

Previously, some supervised volunteers working closely with children were not eligible for the highest-level DBS check. Under the new legislation, relevant supervised roles may now be eligible for an enhanced DBS check including the children's barred list.

This is particularly relevant where individuals work closely and regularly with children, even when supervised by another adult.

What this means for volunteers in practice

For many surf clubs, this is likely to affect volunteers who help regularly with junior sessions, rather than those who support only occasionally.

Examples of volunteers who may fall within scope include:

- regular parent helpers supporting junior surf sessions each week;
- volunteer assistant coaches helping in the water or on the beach;
- volunteers supporting junior surf camps or development programmes;
- regular event volunteers working with children at competitions;
- adults providing overnight supervision during trips or camps.

Government clarification

This does not automatically apply to every occasional volunteer. It is generally relevant where an individual works or volunteers:

- for more than three days within a 30-day period; or
- overnight between 2am and 6am in connection with child-related activity.

This means the focus is usually on adults who have regular and ongoing involvement with children, rather than one-off helpers.

Example

A parent volunteer who helps at junior surf sessions every Saturday for a month, even under direct supervision of a qualified coach, falls within the revised eligibility threshold and should be reviewed as part of the clubs safer recruitment arrangements.

A parent who helps for a single beach clean, one competition day, or a one-off club activity would not usually be affected in the same way.

This change does not automatically mean every volunteer will require a new check. It means clubs and surf schools should review volunteer roles to identify which individuals work closely and regularly enough with children for the higher-level DBS eligibility to apply.

4. Child Criminal Exploitation and Grooming

The Act creates a new standalone offence of child criminal exploitation and makes grooming an aggravating factor in sentencing for child sexual offences.

Grooming does not need to be sexual in nature. It may involve building trust through gifts, transport, opportunities, status, equipment or emotional dependency.

Example

An adult who regularly attends surf sessions takes a particular interest in a young athlete, offers lifts, purchases equipment and gradually creates a private relationship outside organised club activity. This may indicate a safeguarding concern and should be considered carefully by safeguarding leads.

Surf schools, clubs and self-employed coaches, should ensure safeguarding policies explicitly reference child criminal exploitation and grooming indicators.

5. Knife Crime and Event Safety

The Act introduces a new offence relating to possession of a knife or offensive weapon with intent to use unlawful violence. This applies in both public and private settings.

For surfing organisations, this may affect competition and event management where junior participants and spectators are present.

Example

If an event marshal identifies a spectator carrying a knife and behaving aggressively at a junior competition, police can now act where there is evidence of intent, even if no direct threat has yet been made.

Event organisers should review event safety, emergency and safeguarding plans to ensure appropriate escalation procedures are in place.

6. Online Harms against any person

The Crime and Policing Act 2026 introduces several offences relevant to online safety, including:

- AI-generated fake intimate images;
- non-consensual sharing of intimate images;
- stalking and online harassment.

What this means in practice

Many surf clubs and schools use social media, messaging apps and group chats to organise sessions, trips and events. Issues that begin online can quickly become safeguarding concerns within the organisation.

The law is particularly relevant where young people create, share or circulate intimate or manipulated images of others without consent. This includes images created using AI tools.

A key point for clubs to understand is that teenagers may not always recognise when online behaviour has crossed into harmful or unlawful conduct. Young people may describe this as a joke, banter, or something shared privately between friends, but once an image is created or shared without the clear agreement of the person involved, it may become a safeguarding issue and potentially a criminal matter.

Consent and education

This area can be difficult for young people to navigate, particularly where relationships, peer pressure and social media are involved.

Clubs and coaches are not expected to provide legal advice, but they can reinforce simple safeguarding messages with young people:

- consent to take or send an image does not mean consent to share it with anyone else;
- once an image is shared online, the person in it may lose control of where it goes;
- creating or sharing fake intimate images of someone without their agreement can be a criminal offence;
- pressure from friends, teammates or partners to send images should always be treated seriously;
- anyone who feels uncomfortable, pressured or embarrassed should know they can speak to a trusted adult.

This can be included as part of wider conversations about respectful behaviour, online conduct and safeguarding in sport.

Example

If a club member creates or shares a fake intimate image of another member using AI tools, this may constitute a criminal offence and should be treated as a safeguarding concern requiring external referral, not solely as an internal disciplinary matter.

Similarly, if a young person shares an intimate image of a boyfriend, girlfriend or peer without that person's permission, even if the original image was sent voluntarily, the onward sharing may still be unlawful and should be addressed through safeguarding procedures.

Staff and volunteers should report any such concerns through the safeguarding process immediately and avoid viewing, saving or forwarding images themselves unless directed by statutory agencies.

7. Corporate Criminal Liability

From 29 June 2026, incorporated organisations may face criminal liability where a senior manager commits an offence while acting within the scope of their role or authority.

For surfing organisations, this may apply to:

- company directors;
- trustees;
- committee chairs;
- senior managers;
- chief instructors;
- senior safeguarding leads.

This means that in serious cases, where a senior individual acting on behalf of an organisation commits an offence connected to their role, the organisation itself could also face investigation or prosecution.

What this means in practice

For many surf clubs and surf schools, this may initially sound worrying, particularly for volunteer committees and small business owners. However, the purpose of the legislation is to address situations where serious safeguarding concerns are deliberately ignored, hidden, delayed or obstructed by people in positions of authority.

It is not intended to penalise organisations that are trying to follow safeguarding procedures appropriately and act in good faith.

Most affiliated clubs and surf schools already have safeguarding arrangements in place that significantly reduce the likelihood of these issues arising. In practice, organisations that encourage openness, accurate record keeping and prompt reporting of concerns are already taking the right steps.

How organisations can reduce risk

Surf clubs and surf schools can help protect both children and their organisation by ensuring:

- safeguarding concerns are always taken seriously and recorded appropriately;
- welfare officers and safeguarding leads are able to escalate concerns independently;
- no individual has sole control over safeguarding decisions;
- coaches and volunteers know who to contact if they feel a concern is not being acted upon;
- concerns are never delayed because of competitions, staffing pressures, finances or reputation;

- committees and senior staff understand their safeguarding responsibilities.

Clear safeguarding procedures, regular training and a culture where people feel comfortable speaking up are the strongest protections for both children and organisations.

Example

If a senior club official knowingly delays or blocks a safeguarding referral involving a coach in order to protect an event, sponsorship arrangement or the organisation's reputation, both the individual and potentially the organisation could face legal consequences.

By contrast, a club that follows its safeguarding procedures, records concerns appropriately and ensures referrals are made when needed is demonstrating the type of safeguarding culture the legislation is intended to support.

Reassurance for volunteers and club leaders

The government has repeatedly recognised the important role volunteers play in grassroots sport. The intention of these measures is to strengthen child protection and accountability, not discourage people from volunteering or running community sport.

For most organisations, the practical focus should simply be:

- having clear safeguarding procedures;
- supporting welfare officers and safeguarding leads, Surfing England and the Active partnerships network are here to support.
- ensuring concerns are followed through appropriately;
- creating an environment where people feel confident to raise concerns if something does not feel right.

So what next?

Surfing England recommends that affiliated clubs, surf schools and all delivery partners review the following:

Safeguarding procedures

- Review safeguarding and child protection policies against the Act.
- Ensure policies reference mandatory reporting, child criminal exploitation and online harms.
- Confirm referral pathways to statutory agencies are clear.

Workforce checks

- Review volunteer and assistant roles.
- Assess whether DBS eligibility changes affect current staffing arrangements.

Training and communication

- Brief coaches, volunteers and welfare officers on the new duties.
- Reinforce recording, reporting and escalation expectations.

Governance

- Ensure boards, committees and senior leaders understand their responsibilities.
- Ensure no safeguarding process can be delayed or blocked by operational or reputational concerns.

Closing Statement

Surfing continues to provide positive, safe and life-enhancing opportunities for children and young people across England.

Most affiliated organisations will already have safeguarding practices in place that align closely with the principles reinforced by the Crime and Policing Act 2026. The key requirement is to review current arrangements, update where necessary, and ensure all those involved in junior surfing understand their role in safeguarding children effectively.

Surfing England will continue to review national guidance and provide further support to affiliated organisations where additional sector-specific advice becomes available.

The safeguarding team are always happy to offer help and support, we have many resources available on our [Club Hub](#) and recommend reviewing our safeguarding referral form. We will never judge and always have an open-door policy when it comes to discussions surrounding safeguarding.

Area	What the Law Says	What Clubs and Coaches Should Do
Mandatory Reporting	Individuals in regulated activity with children must report child sexual abuse when they become aware of it.	Follow safeguarding procedures immediately and ensure concerns are escalated to the appropriate statutory agency.
Failing to Report	Failure to report is not a criminal offence, but may result in DBS referral or barring from working with children.	Do not assume someone else has dealt with a concern — make sure the referral has been progressed.
Obstructing a Report	Deliberately preventing or delaying a safeguarding report is a criminal offence punishable by up to seven years imprisonment.	Never delay safeguarding concerns because of events, staffing pressures or reputation concerns.
DBS and Supervised Volunteers	Some supervised volunteers working closely and regularly with children may now be eligible for enhanced DBS checks with barred list checks.	Review volunteer roles and safer recruitment arrangements.
Child Criminal Exploitation & Grooming	Grooming is now an aggravating factor in sentencing and child criminal exploitation is recognised as abuse.	Be alert to unusual relationships, gifts, secrecy, private communication or inappropriate attention towards young people.
Knife Crime & Event Safety	Police can act earlier where there is intent to use unlawful violence involving a knife or weapon.	Ensure event staff know escalation procedures and emergency contacts.
Online Harms	AI-generated fake intimate images, image sharing without consent, stalking and online harassment are criminal offences.	Reinforce online safety, respectful behaviour and consent education with young people.
Corporate Criminal Liability	Incorporated organisations may face liability where senior individuals commit offences connected to their role.	Maintain clear safeguarding oversight, escalation routes and accurate record keeping.

FURTHER INFORMATION

Sources and Guidance

→ Crime and Policing Act 2026 — GOV.UK

<https://www.gov.uk/government/collections/crime-and-policing-act-2026>

Official factsheets on all key provisions

→ CPSU — Child Protection in Sport Unit

<https://thecpsu.org.uk/>

The leading safeguarding resource for the sports sector — guidance, templates, and training for clubs and NGBs

→ NSPCC Mandatory Reporting Free Training (1 hour)

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/mandatory-reporting/>

Free training recommended for all coaches and sporting volunteers

→ Sport England — Safeguarding Hub

<https://www.sportengland.org/guidance-and-support/safeguarding>

Sport England guidance on safeguarding and DBS checking

→ Spiking Factsheet — GOV.UK

<https://www.gov.uk/government/publications/crime-and-policing-bill-2025-factsheets/crime-and-policing-bill-spikingfactsheet-moj>

Official factsheet on the new spiking offence — relevant for post-match and social events

→ Revenge Porn Helpline — Non-Consensual Intimate Images

<https://revengepornhelpline.org.uk/>

Support for victims of intimate image abuse

→ Emmaus Safe Hub — Sports Sector Safeguarding

<https://hub.emmaussafe.com/>

Training, policy templates, and sector-specific guidance