

Terry Green Quoted on Cyberflashing Reclassification Under the Online Safety Act

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In this article, London Deputy Managing Partner Terry Green comments on the UK government's move to reclassify cyberflashing as a priority offence under the Online Safety Act. There is a big emphasis on the protection of women and girls from unsolicited explicit images or videos sent by digital means. It also explains that while cyberflashing was already captured as an illegal harm, its elevation to priority status removes conditional thresholds and obliges all platforms to assess and mitigate the risk proactively. This mirrors a prior November 2024 designation concerning intimate image abuse, indicating that social media platforms should anticipate only having a very short period from the secondary legislation's enactment to update risk assessments, policies and procedures.

"This designation may not result in substantial changes for platforms with an existing risk of cyberflashing, as it is a risk that they would have already taken into account; however, it signals the importance for platforms to track new types of illegal harms and priority offences, which is required under the Illegal Content Code of Practice," Terry said.

The platform's failure to comply could lead to substantial fines and business interruption (i.e., takedown of the platform, stopping suppliers from dealing with the platform, and personal liability of directors and associated entities, including potential criminal sanctions) and, importantly, can potentially affect any platform anywhere in the world as the provisions relate to platforms with UK users.

"[TOPIC: Cyberflashing to be reclassified under the Online Safety Act](#)," *The Legal Diary*, October 3, 2025

CONTACTS

For more information, contact your Katten attorney or any of the following attorneys.



Terry Green

+44 (0) 20 7776 7634

terry.green@katten.co.uk

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