

Position Statement

The Youth Sport Trust are adopting a ‘no faces’ approach to the public use of photographs and videos (“images”) of children and young people (under the age of 18), from September 2026.

This decision has been taken following consideration of emerging, AI-related, safeguarding risks and changing sector expectations, which are outlined below.

Legal Requirements

Where an individual can be identified from an image, the image constitutes ‘personal data’, the processing of which is governed by UK Data Protection Legislation. Images may also reveal sensitive information such as an individual’s racial or ethnic origin, religious beliefs, disability or health status, which then constitutes ‘special category data’, with stricter, legal requirements.

Appropriate policies and processes are in place at Youth Sport Trust to support the processing of images, in compliance with all legal requirements. Images of children and young people merit additional protection because they may be less able to understand the risks and long-term consequences associated with the use of their personal data. Therefore, Youth Sport Trust always obtains written parental consent prior to capturing any images of individuals under the age of 18.

Changing Landscape

Advances in AI have significantly changed the risk landscape. Images published on websites and social media can now be copied, manipulated and repurposed with minimal technical expertise. As a result, safeguarding organisations are encouraging a review of not only consent processes, but whether the public sharing of children's images remains appropriate.

External Guidance

The INEQE Safeguarding Group has recently published guidance recommending that organisations view image sharing as a safeguarding issue, requiring a risk-based approach, rather than solely a communications or data protection consideration.

The guidance also highlights that schools and organisations have become targets of blackmail and extortion related to threatened misuse of their images. In May 2026, the Guardian newspaper reported the case of a UK school being blackmailed with AI-generated child sexual abuse material.

Key Messages from the INEQE Guidance

The guidance highlights that:

- Photographs/videos can be manipulated using AI to create indecent or sexually explicit images.
- Images do not need to contain nudity or show a child's full body to be misused.
- Publicly available images can be copied individually or harvested at scale using automated software.
- Once an image is published online, organisations lose control over how it is copied, shared or manipulated.
- Individuals are often unaware that their images have been misused.
- The true scale of image misuse is unknown - many incidents are never detected or reported.

Rather than recommending that organisations stop sharing images altogether, INEQE encourages organisations to assess the risks and adopt an approach that reflects their safeguarding responsibilities. This advice has also been backed by NSPCC Sport who recently shared a new video guide about protecting children's images online: <https://youtu.be/RCXsGa8WtjY?si=IUrv7ZWSOxH2zvt>

Key Risks for Youth Sport Trust

The guidance identifies several risks relevant to Youth Sport Trust:

- 1. Safeguarding** - Publicly available images of children and young people could be manipulated using AI to create child sexual abuse material. This represents an emerging safeguarding risk, even where appropriate consent has been obtained.
- 2. Reputation** - As a national children's charity, Youth Sport Trust relies on the trust of schools, parents, partners and funders. If images originating from Youth Sport Trust platforms were manipulated or used maliciously, this could damage confidence in the organisation despite Youth Sport Trust having complied with all legislative requirements.
- 3. Loss of Control** - Once an image is published on a public website or social media platform, it can be downloaded, copied, screenshotted, shared or harvested by automated software. Removing the original image does not remove copies that may already exist elsewhere.

Sector context

This is an emerging issue across the children's, education and sport sectors, with organisations beginning to review how identifiable images are used on public platforms. The issue is not that organisations have previously acted incorrectly. Rather, advances in AI have fundamentally changed the risk associated with sharing children's images online. This represents a shift from a consent-led approach to a safeguarding-led, risk-based approach.

Future Approach

As far as reasonably practicable, Youth Sport Trust will no longer process identifiable images of under 18s and are adopting a strictly, 'no faces' approach to the public use of such images.

Where applicable, we will discuss our approach with our funders and partners. In situations where our funders and partners still require identifiable images of young people, this can still be facilitated, but the funder/partner will need to take on the role of Data Controller.

Examples of 'no faces' images below demonstrate that activity can still be captured effectively.



