	POLICY	Document Number: DPPo03 Version number: 4 Updated: Sep-2026 Next Review Date: Sep-2028
YOUTH SPORT TRUST	**Image Use**	

v.	Latest Amendment Details	Authorised by
4	No Faces approach for images of young people added.	YST Corporate Comms Team

1. Purpose

1.1 The purpose of this policy is to ensure that all images and videos obtained by the Youth Sport Trust (YST) are dealt with appropriately. It details our approach to obtaining, storing, using and disposing of imagery to ensure that we carry this out consistently and in compliance with current Data Protection Legislation, other UK legislation and general safeguarding good practice.

1.2 Unless otherwise specified, this Image Use policy relates to both digital and printed images, and videos. The terminology '**Images**' means both still images and videos that feature identifiable individuals ('data subjects'), which are defined as 'personal data' under Data Protection Legislation.

1.3 This policy should be read in conjunction with the 'Image Use Procedures' included in Appendix 1.

2. Definitions

2.1 **Data Protection Legislation:** all applicable data protection and privacy legislation in force from time to time in the UK including; the Data Protection Act 2018, the "UK GDPR" (as defined in the Data Protection Act 2018), the Data (Use & Access) Act 2025, the Privacy and Electronic Communications Directive 2002/58/EC (as it has effect in the United Kingdom from time to time) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended.

2.2 **Permanent Deletion:** means files should be unrecoverable.

3. Responsibilities

3.1 Responsibility for the management of Images covers all aspects included within this policy.

3.2 In most cases this responsibility sits with the YST Corporate Communications team.

3.3 Employees responsible for the management of Images, are also responsible for the destruction of Images following expiry of retention periods, in accordance with section 8 below.

4. Obtaining Images

4.1 The inclusion of identifiable individuals in any Images obtained will be carefully considered and limited to that which is deemed necessary or required.

4.2 **From September 2026 the Youth Sport Trust will adopt a 'NO FACES' approach for Images of young people, but written parental consent must still be obtained, in accordance with section 5 below.**

4.3 Images may be obtained as set out below:

4.3.1 from a third party, commissioned by YST to conduct a specific Image shoot. The third party will be YST's data processor, and their responsibilities will be clearly set out in their contract of work.

4.3.2 from YST employees taking Images at an event or training. Images must only be taken where:

a) YST has established a lawful basis for processing (see Section 5 below); and
b) approval has been given from the YST Corporate Communications team; and
c) YST equipment is used (e.g. a YST mobile phone) which is secured with a hard-to-guess PIN and/or biometric security.

4.1.3 from un-commissioned third parties (e.g. our partners or supporters).

5. Lawful Basis for Processing

5.1 As set out in our Data Protection Policy (DPPo01), we will ensure that the lawful basis for processing Images is identified in advance and that all processing complies with current Data Protection Legislation.

5.2 Processing of Images will be undertaken in accordance with our Privacy Notice, the lawful bases for which are summarised below:

5.2.1 Images of adults who have registered to attend a YST event or training will be processed under the lawful basis of legitimate interests. This will be clearly communicated as part of the registration process, including information on how attendees can 'opt-out'.

5.2.2 Images of young people (under 18 years of age) who have registered to attend a YST event or training will be processed under the lawful basis of 'consent'. Written, parental consent will be obtained, as an 'opt-in', as part of the registration process, and must be saved and securely stored (see section 6 below).

5.2.3 Images of any individuals obtained from specific, commissioned photoshoots will be processed under the lawful basis of 'consent', with written parental consent obtained for any individuals under 18 years of age, which must be saved and securely stored (see section 6 below).

5.2.4 Images obtained by partners or supporters will need to be accompanied by either: consent forms from all individuals featured in the Images; or a written declaration that the Images can be lawfully processed by YST, for the agreed purposes. Again, this documented consent must be saved and securely stored (see 6 below).

6. Transmission, Receipt and Storage of Images

6.1 All Images, including from photoshoots, and any corresponding, documented consent obtained, shall be securely transmitted, directly into ResourceSpace, using an 'upload link' obtained from the YST Corporate Communications team.

6.2 The ResourceSpace 'upload link' should be shared with any third parties who will be transmitting Images to YST.

6.3 The YST Corporate Communications team will then be responsible for:

6.3.1 reviewing all Images in accordance with section 9.5 below; and

6.3.2 ensuring that any consent forms are securely stored and clearly referenced to the associated Image(s).

6.4 Storage of Images or consent forms outside of ResourceSpace will only be permitted by members of the YST Corporate Communications team, and will be subject to strict, documented protocols. **Any other copies of Images or consent forms, including on mobile phones, must be permanently deleted.**

7. Use of Images

7.1 Images will only be used in compliance with the lawful basis for processing set out in Section 5 above, in accordance with our legitimate interests or documented consent, as appropriate.

7.2 **Images which include the recognisable face of any young person will not be used publicly.**

7.3 Permission to post Images taken on YST devices directly to social media platforms, including but not limited to Instagram, Facebook, TikTok, LinkedIn, Threads and Bluesky, is strictly limited to members of the YST Corporate Communications team who are administrators of social media accounts and granted access via the Comms Vault on 1 password. After posting, the Images must be retrospectively uploaded into ResourceSpace for traceability.

7.4 The use of Images by YST employees will be strictly in accordance with the ResourceSpace User Guide document, which includes details of the process for checking permissible usage and logging usage centrally, within ResourceSpace.

8. Retention and Disposal of Images

8.1 In accordance with our Retention and Disposal policy (DPPo02), we will only keep Images for as long as necessary to meet our legitimate interests or for as long as another legal basis may enable us to retain the personal data.

8.2 Generally, Images will be retained for a maximum of 5 years after they were obtained.

8.3 Exceptions to this are for Images that are identified as being of particular significance, where YST have established a legitimate interest to retain them for the purpose of ensuring we have an historical record of our work.

8.4 Images stored within ResourceSpace for over 4 years will be reviewed by the YST Corporate Communications team on an annual basis (minimum). They will identify any Images to be retained for historical archive purposes and permanently delete the other Images, within the 5-year retention period.

8.5 Any Images that are retained for longer than 5 years will only be used for the purposes of historical illustration. They will no longer be used as part of our general stock of Images (e.g. as Images for news stories and social media posts).

8.6 Where YST has commissioned a third party to capture Images on our behalf, the contract will stipulate that, within one month of providing the Images to YST, the third party must confirm in writing that all Images have been permanently deleted, and that no Images should be retained or used for any purpose without YST's prior, written approval.

9. Safeguarding of children (under 18 years of age)

9.1 At events, training or specific video/photo shoots, there may be children whose parents or carers have not given consent for Images of their child to be taken. This may be for safeguarding or other reasons.

9.2 Such children will always be given a clearly recognisable identifier to wear, which may be either a different coloured lanyard, specific wristband or sticker, depending on which is most appropriate for the situation.

9.3 YST will be responsible for briefing any third parties, commissioned to take Images, on our **NO FACES** approach, plus the specific identifier that is in use, whether this is at a YST event or an event managed by another organisation (e.g. a school).

9.4 The third party will be responsible for taking all reasonable measures to ensure that the Images they capture do not include the faces of any children, or any children wearing the specific identifier. They will be instructed by YST to review all Images as soon as reasonably practical, following the shoot, and to immediately and permanently delete or crop any Images which inadvertently include the face of any child, or a child who is wearing a recognisable identifier, before sending the Images to YST.

9.5 YST Corporate Communications team will be responsible for reviewing all Images within 2 weeks of receipt. If any Images are found to include the recognisable face of a child, or a child who is wearing a recognisable identifier, and the child cannot be cropped from the picture, then any such Images will be promptly and permanently deleted.

9.6 Unless it is specifically appropriate, names of individual children will not be used in conjunction with their Image(s). Similarly, unless it is specifically appropriate, reasonable measures will be undertaken to obscure other identifying information within Images (e.g. name badges, school names, school/club logos etc).

10. Individuals' Privacy Rights

10.1 If an individual data subject chooses to exercise their privacy rights under Data Protection Legislation, for example, the right to erasure, this will be dealt with in accordance with the YST's Individual Rights Request Procedure (DPP2).

Appendix 1

Image Use Procedures

The NSPCC Child Protection in Sport Unit photography and filming in sports and activities guidance (June 2025) and their latest Video Guide (May 2026) have been adopted with thanks by the YST for the purpose of these procedures.

A. What are these procedures?

These procedures sit alongside the YST Image Use Policy and Social Media Policy. They should be read, understood and followed. They provide details of:

- how YST will use Images of adults, children and young people in publications, on websites, on social media and other online platforms, **including our adoption of a NO FACES approach for Images of young people**;
- how YST will store information legally and in compliance with Data Protection Legislation;
- the actions YST will take to keep adults, children and young people safe; and
- Image consent at YST.

Everyone at YST must follow our Image Use Policy, Social Media Policy and these procedures to help protect children, young people and adults from:

- identification or being contacted for the purpose of future grooming and abuse;
- being identified by an existing perpetrator of abuse;
- Images being adapted or being modified with AI and used inappropriately, for example to blackmail children, families or YST or our Partners; and
- inappropriate taking of Images, or Images being used inappropriately.

For the avoidance of doubt, the term "**Images**" relates to still, digital and printed images of any identifiable individual(s), e.g. photographs and videos, which may include audio recordings of individuals.

B. Image consent

To clarify consent, any adult, child or young person should always be asked at the YST event if they are happy to have their Image taken and used. The individual can either give or decline consent at any time, and their wishes should be honoured, regardless of any previous, written consents given by them or their parents/carers (if they are under 18 years old).

If a child / young person is under the age of 18, written consent **must** be obtained from a parent/carer using the appropriate YST Image Consent Form, before taking any Images.

C. How to gain consent

Consent must always be obtained using the appropriate YST Image Consent Form (or approved, online registration survey), which will ensure that the following requirements are met.

Adults, children, young people and their parents/carers (if they are under 18 years old) should understand what they are consenting to before any Images are taken. They should be made aware:

- that Images are being taken at the YST event;
- that YST has adopted a **NO FACES** approach for Images of young people;
- what the YST is going to use their Image for and how it may be used by the YST in the future;
- how long the YST will keep the Image(s) for, the reason for keeping for this length of time and what will happen once this period ends;
- how the YST will store and process the Image(s); and

- how they can withdraw consent if they change their mind, and how the YST will respond to this request.

Making adults, children, young people and their parents/carers (if they are under 18 years old) aware of the above allows them to provide informed consent. Consent must always be recorded.

If you are wishing to use the Image(s) online or in a printed publication for the YST, it will be difficult to recall it if consent is withdrawn after it is posted or printed and you should explain this in the consent process. This ensures the adult or the parent/carer (if they are under 18 years old) understands this may happen and provides them with the ability to make an informed decision on consent or otherwise.

D. What to do when consent is declined

If an adult, child, young person or their parent or carer (if they are under 18 years old) does not give consent, YST has a responsibility to put in place arrangements to ensure that they are not photographed or videoed. Whoever is taking the Images should be able to easily identify which people should not be subject to any photography or filming at the event.

This could be managed at a YST event by:

- only allowing YST staff or a professional photographer / organisation commissioned by the charity to take Images at the event;
- if parents / carers or spectators are in attendance at the YST event, only allow parents, carers and spectators to take Images of themselves or their own children;
- provide a recognisable badge, sticker, lanyard or wrist band to be worn by anyone that does not have photography and/or filming consent, along with reminders throughout the event;
- provide a clear briefing for a professional photographer/organisation prior to, and during, the event to make sure they are clear which individuals should not feature in Images before any are taken; and
- make sure that everyone at the YST event has seen and agrees to adhere to the YST Image Use Policy, Social Media Policy and the Image Procedures so everyone is clear about what is expected.

E. Consent process for children and young people under the age of 18 being managed by a school or other partner organisation.

In cases where it would not be practicable for YST to attempt to contact parents/carers directly, YST may request that the consent process is managed by a school or other partner organisation. This could be for delivery within a school or events where children and young people will be attending accompanied by their teachers.

In all cases the appropriate YST Image Consent Form (or approved, online registration survey) must be used by the school or partner organisation. Ideally, we should request for these YST forms (or the YST 'School Confirmation of Consent Form') to be completed and returned to YST before the event or, if this is not possible, request that the YST form(s) are provided to YST on arrival at the event.

If the YST Image Consent Forms have not been returned to YST then those children and young people should not have their Image(s) taken.

F. Taking Images at a YST event.

Once consent has been established you should:

- determine if a YST staff member is responsible for photography and filming at the event. If they are, do they understand their role (including our **NO FACES** approach for Images of young people) and how to use the equipment;
- ensure staff only use YST equipment for example iPhone and iPad to take Images at the event. Personal equipment such as personal mobile phones should not be used;
- ensure you have a contract and agreements in place if you have contracted a professional photographer/ organisation;

- consider whether members of the public will be in any public spaces at the event venue and how this will be managed;
- consider the venue's rules and any conditions relating to photography or filming on their premises; and
- consider whether spectators, parents/carers or anyone else is going to be attending the YST event and if so, are they clear on the rules and expectations for photography and filming.

G. Professional photographer or organisation

If YST is considering using a professional photographer or organisation for an event, as part of the contracting process you should:

- provide them with a brief, whether this a YST event or an event managed by another organisation such as a school;
- ensure they are aware of YST's **NO FACES** approach for Images of young people;
- issue them with identification, to be worn at all times;
- provide a clear brief about appropriate Image content and the expectations on their behaviour at the event e.g. YST Event Code of Conduct;
- inform them how to identify individuals who have not provided consent;
- set out areas where no filming or photography should take place, for example toilets, changing areas, first aid areas etc.
- instruct them to review all Images as soon as reasonably practical following the event and to permanently delete or crop any Images which include individuals who have refused consent before they provide the Images to YST;
- provide them with a ResourceSpace 'upload link' which they must use to transmit the Images to; and
- stipulate and ensure that once they have provided the finalised Images to YST they confirm, in writing to YST, within one month, that they have permanently deleted all copies of the Images from their devices and systems.

H. Events and activities in open public spaces

If a YST event is taking place in public space, members of the public are entitled to take Images in public areas regardless of our event taking place. YST will have no right to impose any restrictions on other members of the public accessing or using the same public spaces. This could be a sports festival where YST has a stand with activities taking place to promote the charity.

You may also, accidently, take Images which have members of the public in them, including children and young people. If you do, you must edit the Images as soon as possible, to either remove the individual or blur their Image so they cannot be identified. If this is not possible then the Image(s) should be deleted and not used.

In such circumstances the NSPCC Child Protection in Sport Unit recommend using signage which is clearly displayed to provide those attending, and any members of the public, notification that photography or filming is taking place. Further guidance is available at Safeguarding concerns for events held in public spaces | CPSU

I. Top tips around appropriate Images

When using Images for YST purposes always choose Images that show everyone taking part in a positive light, as well as promoting the best aspects of the charity. In addition, look at any Images with a safeguarding lens. For example:

- **only use Images of young people that do not show their faces**;
- only use Images of adults, children and young people in suitable dress or kit, including recommended safety wear for the sport or activity (if applicable) e.g. shin pads;

- represent everyone who is participating at the event equally;
- remove names of children and young people and any other sensitive personal data so they cannot be identified in the Image(s). For example, this could be sports kit which shows a child's name or clothing which shows a logo relating to the child's school. Consider the same for any adults;
- use Images that focus on the activity at the event rather than on the participants;
- avoid showing the face and body of anyone in activities that require minimal kit, such as gymnastics and swimming; and
- do not take Images with anyone shown in a compromising or inappropriate angle that could be prone to misuse, such as misplaced clothing. If an Image is taken by mistake, ensure it is not used and is promptly deleted.

J. Considerations for sharing Images on social media and online

Ensure you have read and follow the YST Social Media Policy. This policy states that YST corporate accounts will never tag children and young people on social media in anything the YST posts proactively. **Faces and full names must be avoided in any social media posts**, to protect the identities of children and young people as this could put them at risk. Consideration should also be given to adults who may wish for their identity to be protected.

In some instances, school accounts may be tagged.

K. Surveillance cameras and CCTV

If YST is using a venue equipped with surveillance cameras or CCTV, all attendees should be informed in advance through the pre-event information sent to participants or, if they are under 18, to their parents/carers.

L. Storing Images at the Youth Sport Trust

Photographs and videos are classed as personal data by law. YST must store all Images we use for official charity purposes in ResourceSpace, to ensure compliance with the requirements of Data Protection Legislation.

We can limit the risk of unauthorised access or inappropriate use of Images by following the YST Image Use Policy and Retention and Disposal Policy.

M. Further help

If you have any questions regarding the YST Image Use Policy, Social Media Policy or these procedures please contact the YST Corporate Communications team, the YST Safeguarding Lead, or the YST Data Protection Lead.