

## safeguarding

# Settings revise image-sharing

Concerns over breaching children's rights and images being manipulated by criminals

- Some childcare providers have stopped using identifiable images of children due to concerns over risks posed by AI manipulation tools.
- Reports of AI-generated child sexual abuse material have more than doubled in the past year.

Some childcare providers in England and Scotland have updated policies around sharing images of children online amid concerns over AI manipulation tools allowing criminals to use publicly available photos to create sexual abuse material.

The UK Safer Internet Centre has issued new guidance for schools and early years settings on protecting the identity of children online following reports of schools being targeted by blackmailers who have manipulated images from their websites using AI.

### Early years action

Childcare charity Flexible Childcare Services Scotland (FCSS) announced in March that it had made the decision to 'end the use of identifiable children's photographs on public-facing social media and online platforms'.

FCSS is a national charity with 15 childcare settings across the country.

Chief executive Susan McGhee says the decision to stop using photographs of children in the settings publicly was 'really tough' but will ensure children are protected 'now and in the future'.

'We love sharing photos of the children and we know how important it is for parents and carers to see what they've been doing, but we have a responsibility to protect the children in our care and this seems like a very logical step.'



FCSS is focusing on taking more detailed pictures of children's activities to avoid showing their faces

She explains that in Scotland, the United Nations Convention on the Rights of the Child (UNCRC) is enshrined in law.

'We're always looking at the decisions we're taking through that children's rights perspective, and they do have the right to have their identity protected and not to have their image spread all over the place,' she says.

McGhee adds that concerns over the use of image manipulation through AI and long-term data protection issues linked to sharing images online were key factors in FCSS's decision to stop sharing identifiable photos of children.

'From the moment an image is posted online it can be downloaded, shared, altered or stored and we have no control. We also don't understand the potential consequences that sharing photos could have on the individual; could facial recognition on an image posted now affect the individual in the future? It's a risk we don't want to take,' she explains.

The London Early Years Foundation (LEYF) has also made the decision to stop sharing identifiable images of children in its settings online.

LEYF is a social enterprise



'It's going to stretch our creative mindset a little bit more'

running 43 nurseries across London.

Francoise Facella, LEYF's brand and creative leader, explains that most early years organisations use children's images online and in marketing campaigns because it is the 'easiest way to show the joy and the learning and everything that's happening' in a setting.

'From an artistic perspective, it's perfect,' she adds. 'However, we live in a very weird world, and technology is not serving us as much as it could be and, unfortunately, we have to be wary of that.'

Like McGhee, Facella says both risks around the increased use of AI and uncertainty around children's views on having their images shared when they reach adulthood have factored into LEYF's decision.

'Even though it's standard practice to ask a parent to give

consent [for images to be shared online], we're much aware that the children themselves haven't given consent. We're so big on children's voices – valuing their voice, their perspective and their opinion, and respecting them – that we started to question if doing that was OK,' she adds, describing the risk of AI manipulation of children's images as 'very dark and very scary'.

### New policies

Both the FCSS and LEYF have decided not to share new images of children on their websites or social media.

As part of its new policy, FCSS states that instead of sharing photos where children can be recognised, the charity will use 'thoughtful, creative approaches to showcasing children's learning and development, capturing the joy and curiosity of childhood without ever putting a child's identity at risk.'

'This will include close-up photos of children engaging in learning activities, hands in sensory trays, from behind the child or of a group of children where no child's face is visible,' says McGhee.

Facella adds that LEYF will 'focus on backs of the heads of the children and details of the hands and feet carrying out activities' without using 'details that can be identified through AI.'

LEYF chief executive June O'Sullivan says that the organisation has not ruled out using models within settings for future campaigns as well as options including animation.

'It's probably going to stretch our creative mindset a little bit more to think about how we tell stories,' she explains.

Neither LEYF nor FCSS have removed existing images of children from their websites or social media, but both say they will look at doing so over the next six months to a year.

However, Facella explains that

# policies as A.I. misuse rises

using AI has led some groups to stop sharing pictures of children online. By **Fiona Simpson**

LEYF has removed all images of children from its X account amid concerns over the increasing use of AI manipulation tool Grok.

'We had to close our account as it was the quickest way to have all those images removed then wait 28 days to reclaim our account so no-one else could use it,' she says.

## Staff concerns

McGhee says that when she initially spoke to her leadership team and managers about the use of children's images, 'there was a bit of resistance at first' as the use of images 'is a great way to attract new parents to use the service'.

She adds that some staff members were also concerned about the impact on inspection results due to a belief that 'inspectors want to see images of happy children', which led to a conversation with the Care Inspectorate in Scotland to allay concerns. 'They said they would be really supportive of not having children's images used,' she says.

Facella adds that at LEYF, 'some people are fully on board, some people are still questioning if we're going to get the same results without using images of children, but from a strategic point of view, from a decency point of view, we know we've made the right choice.'

O'Sullivan suggests that conversations with employees around online safety may lead to future policy changes around sharing images of staff.

'We use the staff's images quite a lot, they give permission, but I think as they become more aware, because we are having these conversations, they might not want to give that permission. It's what you might call the organisational direction of travel in relation to cyber-security. For me, it's a cultural shift,' she explains.

## Parental views

Both LEYF and FCSS say that while they haven't seen many

parents withdrawing consent for children's images to be shared in light of AI developments, both have seen new parents becoming less likely to give consent for their child's image being shared, suggesting such policy changes are timely.

At FCSS, McGhee says the organisation contacted parents about plans to stop using identifiable pictures of children across its website and open and private social media platforms.

'They understood why we had made that decision,' she says. 'It's about keeping children safe.'

She adds that a few people asked if faces of children could still be shared on private Facebook groups used by parents, but 'we had to say "no, not really", because even though it is a closed group, if someone takes a screenshot and sends it on, you don't know where that's going to end up'.

Princess Souassou Tsiagbe, an early years tech integration consultant, says, 'Nurseries and childminders need to work in partnership with parents

and educate them on online safety and putting children's faces online.

'I recently saw a situation where someone had been sent pictures of family members' children; they'd sent them on to someone else who was pretending [on social media] that these children were their own children. It's scary.'

Facella says that while LEYF is in the early stages of its new policy, it has not publicly announced the changes to parents.

'I think we'll wait six months or so to have a little bit more content, then we'll change everything including the website and make an announcement. There hasn't been anything negative, which makes me think people either haven't noticed or are enjoying it,' she comments.

Facella goes on to explain that the organisation's online engagement has not changed despite no longer posting images showing children's faces on social media.

'It's interesting, because what

**'We don't understand the potential consequences that sharing photos could have on the individual'**

we've been doing so far is mostly on social media, Instagram particularly, and our content has been performing well. I think it's because we have to be even more creative so the storytelling is stronger through captions, explaining what children are doing and why it's important,' she adds.

## AI threats

The publication of the UK Safer Internet Centre guidance has been driven by the UK Online Harms Early Warning Working Group (EWWG) – a coalition of safeguarding charities and organisations.

EWWG was contacted by the police to help block the distribution of sexual images of children that had been sourced from a secondary school's website and altered using AI tools. The blackmailers sent the criminal images to the school, threatening to share them more widely if the school did not pay them money.

Analysts from the Internet Watch Foundation (IWF), which is part of the EWWG, assessed around 150 confirmed images of child sexual abuse. Experts say these images were then 'hashed' – which means they were given a digital fingerprint – and added to a blocking list, which tech companies can use to stop the imagery from being viewed or downloaded.

The UK Safer Internet Centre says that while incidents of this type do not yet appear to be widespread, the concern from



**New guidance advises sharing images showing backs of heads**



**LEYF has committed to protecting children's identity online**

police, education professionals and child safety organisations in the EWWG is that it is 'only a matter of time' before more schools and early years settings will be targeted by criminals in this way.

EWWG chair Will Gardner says, 'It is incredibly sad to think that pictures of children taking part in school activities, showing their rightful and positive place in their communities, have now become a target for cynical scammers willing to exploit children to make money.'

IWF hotline manager Tamsin McNally adds that while the IWF is contacted 'every day' about the 'financially motivated sexual extortion of children', the rapid improvement in AI technology means that 'hundreds of children's images can now be used for blackmail by criminals.'

### Protective measures

It offers a checklist of actions for education settings to help staff recognise and respond to incidents of image-based abuse

and ensure that children's safety, dignity and emotional wellbeing are prioritised when pictures are shared.

Among its recommendations (see box), the guidance suggests 'using imagery that is harder to misuse or abuse; this could be by only sharing photos taken from a distance, blurred images or images taken from over the shoulder'. It also recommends training for staff and poses questions around the appropriate use of imagery.

McNally notes that tools such as IWF and Childline's Report Remove for under-18s 'can be used to try and take back control of [sexual abuse] imagery'.

Gardner adds, 'The safeguarding of students' imagery should be a high priority for education settings and, where [they] might once have been proud of what they could display on their website, now they can

take pride in ensuring they have taken all possible steps to best protect their students and staff online.'

### Finding a balance

Souassou Tsiagbe argues that 'you need to find a balance' between business promotion for early years organisations and keeping children safe.

'It's about getting parents' permission and doing your best to take pictures that don't involve children's faces, because children don't have that full autonomy [around consent].

'If you are using children for marketing, you need to be really careful about it. We do live in a cruel world where people will use children's images and we now have the added risk of generative AI that can make anything using a person's likeness,' she says.

Data from the IWF released in November 2025 shows reports of AI-generated child sexual abuse material had more than doubled in the past year, rising from 199 in 2024 to 426



**'We're very much aware that the children themselves haven't given consent'**

last year, with images of birth to two-year-olds surging from five in 2024 to 92 in 2025.

The guidance comes as Mayor of London Sadiq Khan has pledged £6 million to tackle tech-enabled violence against women and girls, including the use of AI 'deepfakes' as blackmailers, highlighting the prevalence of the issue nationally.

The Government's Crime and Policing Bill 2026, which was enshrined in law in April, updates legislation on creating sexual abuse images of children to include those manipulated with artificial intelligence.

It is illegal to possess, create or distribute AI tools designed to create child sexual abuse material, with a punishment of up to five years in prison; and possessing 'AI paedophile manuals' – which teach people how to use AI for sexual abuse – will see offenders get up to three years in prison.

Safeguarding minister Jess Phillips says, 'We will not hesitate to go further if necessary and make sure our laws stay up to date with the latest threats.'

**FCSS says it has found more creative ways to share images**

## key elements of UK Safer Internet Centre guidance

The essential guidance lays out the risks of sharing images and videos of pupils on websites and social media platforms, giving key advice for managing children's image security in education settings.

It advises training for staff to 'recognise and respond to incidents of image-based abuse with emphasis on prevention and safe practice'.

It also calls on staff to:

- Ensure any immediate safeguarding response prioritises the student's

safety, dignity and emotional wellbeing.

- Report any blackmail or threats involving imagery to the police as a criminal matter, alongside following internal safeguarding procedures.

It offers options for settings on how to avoid using identifiable images of children, including:

- Replacing images that directly show a student face-on, using alternative angles or group shots where possible.
- Avoid names or full names.

- Limit public visibility of student images (e.g., using closed groups rather than open media platforms).
- Ensure all image metadata is stripped before publication.
- Use lower-resolution images to reduce risk of misuse.

The guidance also offers a checklist for settings around parental consent, contract renewal and audits, as well as a guide on what to do if images of young people are misused, altered or abused.