

Safeguarding & Gen AI: Photography of Children

How can we protect photographs, video and digital media of children and young people from the risks of generative artificial intelligence?



Commissioned by A New Direction in partnership with:



Safeguarding & Gen AI: Photography of Children

This document has been created by A New Direction as an urgent response to the risk presented by the misuse of generative artificial intelligence (Gen AI) to steal and manipulate photographs of children.

A New Direction set up a working group and invited a sector-wide open conversation on this topic in 2025. This document was created in March 2026 from those roundtable discussions to share our thinking and support others working with children and young people to think about their own practice. It is not intended to be comprehensive list of advice, but we hope that these suggestions can strengthen the efforts of us all to protect children and young people from the evolving safeguarding risks in the age of AI.



Why are we concerned?

With the rapid development of Gen AI, concern for how photographs of children are shared and used by organisations in their social media, marketing and on websites, now goes far beyond concerns for privacy.

AI presents significant long-term risks; the most serious being the use of Gen AI to create pornographic or sexualised images of children. This has recently gained much political and media attention because of the widespread use of new social media applications. These applications, sometimes described as 'nudification' apps, are simple to use and cheap, and are being used to create and share numerous degrading, non-consensual, intimate and fake-nude images from ordinary photographs of children.

The Internet Watch Foundation (IWF) reported an alarming rise in AI generated child abuse images. One forum uploaded over 20,000 images in one month. In some cases, AI-generated images have been used to threaten or blackmail children and teenagers, pressurising them to produce explicit content or ransom money.

Creating or requesting fake intimate images, using AI, has recently been made a criminal offence, however it will be enormously difficult to prevent or identify these crimes as perpetrators often have connections extending across the world and often use the dark web to share images.

It is relatively easy for offenders to capture photographs from the social media or websites of organisations. They can then utilise Gen AI to manipulate them into child pornography and share them widely with other criminals. These images could exist on the internet indefinitely. Organisations, the parents/carers of children and the child victims may never know that this has happened.

There is a risk that Government legislation will not keep up with the fast pace of developments in AI and that the Government will be under pressure to act in favour of tech companies. (Currently tech companies have far greater access to UK Government ministers than child safety groups.)

Another risk presented by AI is the use of photographs without consent as training data. Millions of children's photos are being harvested from webpages and social media to train AI models without consent. When a photograph is used to train AI, it cannot be undone, which means that children's images are permanently embedded in AI technology.

What you can do to protect children

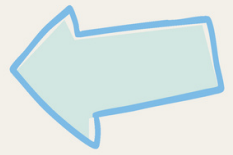
Action needs to happen across all sectors, from the Government to communities, but we want to support cultural leaders to be proactive, as individuals and within organisations, to start the urgent task of considering AI and digital safeguarding. Following our sector-wide discussions, below are some ideas for how organisations working with children and young people can protect them and their digital media from the risks of AI.

Safer use of photos

We want to support the use of images of children and young people (through photography and film) to be done in a safe way that protects children and young people. We know that the use of photography and video is often integral to many creative arts projects and are art forms in themselves. We don't want to eradicate photography altogether but encourage discussion about how it is used responsibly. Here are some ideas to support you in considering how to ensure it can happen safely, and some suggestions for alternatives you might want to consider.



Data and identity protection



1. Consider image capturing, and the implications, during the early planning stages of your projects with children.
2. You could share hard copies of photographs with participants and their parents/carers, rather than digital photographs.
3. If you choose to share photos of your participants digitally, you can use encrypted messaging apps, like WhatsApp, instead of email or public platforms. (Encryption means the images are only accessible to the people you message.) You can also use 'view once' options on WhatsApp.
4. You could use face-free images such as photos taken from the back, from a distance, children wearing theatre masks or photos of just their hands.
5. You could consider covering or redacting faces, using emojis, pixilation or other redaction methods. Make sure that it's not possible for people to undo the redaction.
6. Use creative software to edit/manipulate images in interesting ways, so that children are not recognisable. Again, make sure that it's not possible for people to undo the edits.
7. As GDPR applies to photographs, it is safer to avoid uploading images to the cloud and use desktop applications to make edits to images of identifiable people.
8. Consider how and where you are using images of children and young people; in reports, on your websites and social media and avoid sharing photos of children looking vulnerable.

Alternatives to sharing photos

1. Consider other ways to document your work – for example, using an illustrator/visual artist to capture evidence of your projects with children.
2. You might want to use carefully chosen written text e.g. descriptions of what you would see if you attended a workshop or performance; first person narratives about the project's impact written by children or artists; extracts of scripts, poems and other creative writing by participants; testimonials from children, parents/carers and other adults.
3. Consider inviting children to create avatars (made without generative AI) to represent themselves and/or commission an animation that tells the story of the project.
4. You could share visual art/illustrations, by children, that have been created as part of the evaluation process or that capture a moment from the project.
5. It might be helpful to encourage funders and partners to attend workshops and project outcomes, so they can experience the work first hand.

Raising awareness

As individuals and leaders in the sector, you could do the following:

1. Be active advocates, raising the awareness of stakeholders such as freelancers, your workforce, partner organisations, trustees, funders and strategic organisations, and the parents/carers of the children you work with.
2. Consider organising training for stakeholders, including the children you work with.
3. Talk to your funders and partners about how and why you are changing your safeguarding policy in relation to photographs and videos of children.
4. Invite other organisations to a conversation, so you can learn from each other and develop a joined-up approach.
5. Bring children together to talk with you and include their ideas and concerns in your plans. Help them to make safer choices, recognise that not everything they see online is real and to tell a responsible adult if they feel uncomfortable or unsafe.
6. Raise awareness for parents/carers of the children you work with. For instance, suggest that, on social media, they set privacy settings to the maximum, and limit followers to trusted family and friends. (Even 'private' accounts are not entirely safe, as tagged photos can be shared.)



Policy and implementation

Here are some suggestions which could be helpful for organisations to consider when updating existing policies and frameworks to include AI safeguarding.

1. Clarify your organisation's purpose, aims and objectives in sharing children's photographs and include your marketing, communications and development colleagues in reviewing your strategy.
2. Adapt your safeguarding policy to include new or stronger provisions relating to AI and photography. Disseminate this to all stakeholders.

You might want to include:

- Provision for how long and where photographs of children are stored and labelled
- A system for recording how you have used photographs.
- A process for how archived photographs are reviewed or audited and when and why they are deleted.



- How children and their parents/carers consent to photographs being used, how often their decisions are reviewed, if children can override parental consent and provision for when preferences may change.
- Restrictions on who can access stored photographs of children, such as using password protection on files and folders.
- Restrictions on freelancers or members of staff using personal mobile phone cameras.
- Provision for photography projects, if appropriate, especially when participants are taking and sharing digital photographs.
- Policy provision for video content that matches the provision for photography.

3. Consider if your policy extends to the protection of adults, such as staff members, freelancers and especially vulnerable adults.

4. Consider your policy framework on whistleblowing, including training for staff in and around your organisation to ensure confidence around reporting concerns.

5. Give serious consideration to how you engage and work with photographers and film-makers, including but not limited to ensuring they have enhanced DBS checks and have been thoroughly vetted through seeking recommendations and references.

Consider the following questions:

- Who owns the IP of the images created? If it's the commissioner, is the photographer granted any usage rights and what does this cover? If it's the photographer, have you agreed any restrictions as to where and how else they can use the image, for example within their portfolio/ on their website?
- What arrangements are in place for image file transfer? Are these systems secure? Is the photographer required to delete files once they have completed the work?
- What considerations have been given to editing software and image manipulation/touch up?
- Is it clear how and where the images will be used and safeguards you might put in place? Have you discussed with the photographer whether you will crop/ obscure / add a watermark etc. to images when using them, to help mitigate risk of images being 'scraped' by AI?



6. Consider how your policy framework connects with the wider national and regional policy framework.

7. If you are concerned about a child's photo being used in an AI-generated image, you can use the Internet Watch Foundation's Report Remove service (www.iwf.org.uk/our-technology/report-remove) to help get them taken down.

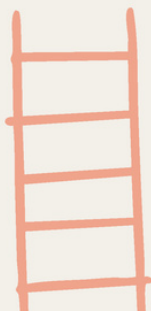
If you are a funder, you might also want to consider:

- what images you require from your grantees and why;
- how you communicate with your grantees about the use of children's photographs;
- working with other funders to show leadership about AI and safeguarding.



If you are a parent/ carer, you might also want to consider:

- how your child might wish you to protect their image until they are an adult and are able to make their own choices;
- how to talk to children about AI safety;
- how to ensure privacy settings on social media are the strongest they can be and limiting followers to trusted family and friends;
- making your wishes clear to other adults about whether photographs of your children can be shared or not.



References

Grok: xAI, Musk and the Growing AI Debate. Technology Magazine, https://technologymagazine.com/news/grok-xai-musk-growing-ai-debate?utm_source=chatgpt.com. Accessed 10 Mar. 2026.

Tech Companies' Access to UK Ministers Dwarfs That of Child Safety Groups. The Guardian, <https://www.theguardian.com/politics/2026/jan/17/tech-companies-access-to-uk-ministers-dwarfs-that-of-child-safety-groups>. Accessed 10 Mar. 2026.

Blogs. Children's Commissioner for England, <https://www.childrenscommissioner.gov.uk/category/blog/>. Accessed 10 Mar. 2026.

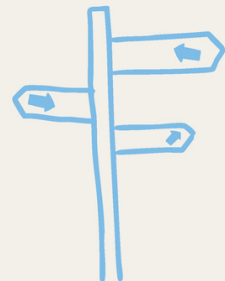
Grok Is Undressing Women and Children. The U.S. Must Act. The Guardian, <https://www.theguardian.com/commentisfree/2026/jan/09/grok-undressing-women-children-us-action>. Accessed 10 Mar. 2026.

IWF 2024: Addressing AI-Generated Child Sexual Abuse Imagery. Internet Watch Foundation, <https://www.iwf.org.uk/annual-data-insights-report-2024/data-and-insights/ai-generated-child-sexual-abuse/>. Accessed 10 Mar. 2026.

Secretary of State Statement to the House of Commons: 12 January 2026. GOV.UK, <https://www.gov.uk/government/speeches/secretary-of-state-statement-to-the-house-of-commons-12-january-2026>. Accessed 10 Mar. 2026.

Ofcom Launches Investigation into X over Grok Sexualised Imagery. Ofcom, <https://www.ofcom.org.uk/online-safety/illegal-and-harmful-content/ofcom-launches-investigation-into-x-over-grok-sexualised-imagery>. Accessed 10 Mar. 2026.

AI's Child-Porn Problem Is Getting Much Worse. The Atlantic, <https://www.theatlantic.com/technology/2026/01/ais-child-porn-problem-getting-much-worse/685641/>. Accessed 10 Mar. 2026.

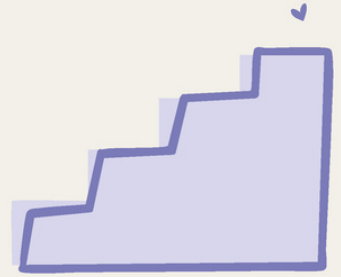


Join in the discussion

To join in any future conversions, sign up to our newsletter:
www.anewdirection.org.uk/subscribe

You can find further information about A New Direction's sector-wide roundtable discussions on AI in our blogs:

- [Protecting participants in the Age of AI](#)
- [Disrupting image representation in the Age of AI](#)



Written by Stella Barnes.

Shaped by discussions and contributions from cultural sector practitioners.

Illustrations provided by Nic Golightly.

Published April 2026.



A New Direction is an award-winning charity (1126216) working to enhance the capacity and agency of children and young people in London to own their creativity, shape culture, and achieve their creative potential.



@anewdirectionldn



@anewdirection_ldn



@anewdirectionlondon



@ANewDirectionLtd



@a-new-direction-london

info@anewdirection.org.uk
www.anewdirection.org.uk