

SPS photo taking policy

1. BACKGROUND

Using images of young people for publication, promotion or coaching

Sports organisations and clubs benefit from using images of young participants to promote and celebrate activities, events and competitions. Some coaches also find it helpful to use photographs or videos as a tool to support a young athlete's skills development.

It's important that children and young people feel happy with their achievements and have photographs and films of their special moments. Family and friends also want to be able to share the successes of their children when they have been part of a special event or activity.

However, some children, parents or carers may not be comfortable with images of themselves, or their children being shared. For example:

if a child and/or their family have experienced abuse they may worry about the perpetrator tracing them online

children who choose not to have contact with some members of their family may decide to minimise their online presence

families may have religious or cultural reasons for choosing not to be photographed.

It's important to be aware of child protection and safeguarding issues when taking photos of or filming children and young people. The potential for misuse of images can be reduced if organisations are aware of the potential dangers and put appropriate measures in place.

There are also data protection implications of making, using and storing images of children and young people for your organisation's use.

The use of photos and videos on websites and social media, and in posters, the press or other publications, can pose direct and indirect risks to children and young people if not managed correctly.

Organisations wishing to use or permit the use of images of children involved in their activities must therefore have a policy in place to safeguard them.

2. MINIMISING THE RISKS

Think carefully before using any images showing children and young people on the website, social media, for example ticktok, whatup etc.

choose images that present the activity in a positive light, and promote the best aspects of the sport and organisation

Don't supply full names of children along with the images, unless: it's considered necessary - such as for elite young athletes/prize giving etc

it's in the child's best interests always get the child and parent consent for any photos on social media.

Only use images of children in suitable dress or kit, including recommended safety wear such as BA, Helmet, paddle etc

Note that activities such as kids swimming, Kayak racing present a higher risk for potential misuse than others, so images of these activities should:

- focus on the activity rather than a particular child
- avoid showing the full face and body of a child - instead show children in the water, or from the waist or shoulders up

avoid images and camera angles that may be more prone to misinterpretation or misuse than others

- consider using models or illustrations if you are promoting an activity, rather than the children who are actually involved in it

coaches who use images of athletes as part of their training need to ensure that the image/ video is only used with that individual and agree with the individual how the image retained if needed at times coaches may want to use images etc to demonstrate their teaching and consent must be obtained by the individual including use of the images, retention, safe storage and confidentiality

3.USING OFFICIAL OR PROFESSIONAL PHOTOGRAPHERS

You should establish and clarify many of these points as part of the commissioning or contracting process:

inform parents and children that a photographer will be in attendance

ensure parents and children consent to both the taking and publication of films or photos - see NSPCC form appendix 1

Check the photographer's identity, the validity of their role, and the purpose and use of the images to be taken

issue the photographer with identification, which must be worn at all times

provide the photographer with a clear brief about what is considered appropriate in terms of image content and their behaviour

clarify areas where all photography is prohibited (toilets, changing areas, first aid areas, and so on); for more on this, click on the 'Mobile phones and cameras in changing rooms' tab above (or below, on mobile devices)

inform the photographer about how to identify - and avoid taking images of - children without the required parental consent for photography

Don't allow unsupervised access to children or one-to-one photo sessions at events

Don't allow photo sessions away from the event - for instance, at a young person's home

Clarify issues about ownership of and access to all images, and for how long they'll be retained and/or used

4.RESPONDING TO CONCERNS

All staff, volunteers, children and parents should be informed that if they have any concerns regarding inappropriate or intrusive photography (in terms of the way, by whom, or where photography is being undertaken), these should be reported to the event organiser or another official.

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Ensure that the welfare officer is informed. Concerns about professional photographers should also be reported to their employers and the welfare officer and possibly British Canoe union (BCU).

If there are concerns or suspicions about potentially criminal behaviour this should include referral to the police.

5. WHEN TO SEEK PARENTAL PERMISSION

Seek parents' consent to take and use images of individual or smaller groups of participants in which their child would easily be recognisable - nspcc consent form appendix 1

Let parents know how, where and in what context an image may be used - for example, on a public website, through social media or in a printed resource also the agreement of where to store any photos and length of time.

Make parents aware of your policy on using children's images, and of the way these represent the organisation or activity.

Complete a parental consent form for use of images of children as part of the process for registering and consenting the child's participation in the activity or event or club trip.

Where able ask for the child's permission to use their image - and have them fill in a permission form to ensure they're aware of how the image may be used

6. Adult's consent

Where able inform adults of possibility of being photographed note that legislation and best practice is to have an assumption that people do not want to be photographed so for all events etc a request should be made rather than a blanket consent form being used for all.

Note that some adults may not be able to understand the possible ramifications of being in a public Domain and as such should be assumed as lacking capacity to make this decision where able a guardian should be sort to ensure the safety of the individual adult. It is again not recommended best practice that you should not take photos of the individual as they may be seen to be discriminatory.

Ensure that Adults are informed when photos and where used how stored and retention period and if displayed in a public arena gain consent.

7. General images of events

At many events, the public and organisers may wish to take wide-angle, more general images of the event, the site, opening and closing ceremonies etc. It's usually not reasonable, practical or proportionate to secure consent for every participating child and adult in order to take such images, or to preclude such photography. In these circumstances, organisers should make clear to all participants and parents that these kinds of images will be taken, and for what purposes prior to the event.

Organisers have a responsibility to put in place arrangements to ensure that any official or professional photographers can identify (or be informed about) which children should not be subject to close-up photography. This should be done in consultation with parents.

An individual risk assessment must be completed when a professional photographer is on site and ensure that children and vulnerable adults are protected from having their photo taken if this is against their wishes or due to safeguarding concerns. Images or video recordings of children must be kept securely: hard copies of images should be kept as a minimum in a locked drawer but preferably electronic in a protected folder with restricted access

Images should not be stored on unencrypted portable equipment such as laptops, memory sticks or mobile phones

Clarity on length of time stored and when the images will then be deleted.

Ensure that any member of Shropshire Paddlesports, who shares images via social media without permission, is asked to remove such content. This should also be reported to the Welfare Officer, Safeguarding Lead and Directors who will consider if the individual needs to be disciplined or have their membership revoked and/or reported to the police. For guidance on the Data Protection Act and other privacy regulations, visit the Information Commissioner's Office (ICO) website.

8. Talented young athletes

As young athletes progress up the competitive ladder, their sporting success can lead to an increased public profile event organisers and sport's governing bodies will look to positively promote their sport. elite young athletes who receive endorsements or sponsorship may welcome positive media coverage on a local, regional or national level In these cases, some aspects of the Shropshire paddle sport guidance around the use of images and publishing identifying information are neither practical nor desirable and special agreement should be sort with the induvial/and also ensure all others club members are aware.

9. PHOTOGRAPHY BY PARENTS AND SPECTATORS AT EVENTS

Most spectators - especially competitors' family and friends - will want to take photos or videos at sports events.

Although parental consent is not required for photography by the public, event organisers should make the photography policy clear to all participants and parents ahead of the event.

Minimising the risks

For racing and other very public event a risk assessment must be made and consider the following:

- A total ban on any photography
- How the event will be advertised local news etc
- At registration of individuals agreement on who intend to take photos and what purpose
- No overall public photography ban for the event
- The event venue is a public area, so no ban is possible
- Clarify and promote the photography rules for the event to all staff, volunteers, spectators, parents and young participants
- In these rules, include areas where photography is banned; for more on this, click on the 'Mobile phones and cameras in changing rooms' tab above (or below, on mobile devices)
- Warn parents and spectators that there can be negative consequences to sharing images linked to information about their own or other people's children on social media (Facebook, Twitter) - and care should be taken about 'tagging'
- Establish procedures to respond to and manage any concerns arising, including clear reporting structures and a system to contact police when necessary

10. GETTING THE MESSAGE ACROSS

There's a range of ways event organisers can inform stakeholders about their photography policy, including:

- pre-event registration, consent or information forms
- packs and leaflets for all event staff and volunteers, participants and parents
- pre-event induction or training for staff and volunteers
- event programmes
- posters and signage around the venue

public-address announcements during the event

11. RESPONDING TO CONCERNS

All staff, volunteers, children and parents should be informed that if they have any concerns regarding inappropriate or intrusive photography (in terms of the way, by whom, or where photography is being undertaken), these should be reported to the event organiser or another official.

There must be a safeguarding procedure in place to ensure that reported concerns are dealt with in the same way as any other child-protection issue. Ensure that your club or event organiser, or lead child protection or safeguarding officer is informed.

If there are concerns or suspicions about potentially criminal behaviour this should include referral to the police.

12. Photography in changing rooms and showers

A growing number of incidents involving inappropriate or illegal photography of children in changing and shower areas of many sports and leisure facilities are being reported.

What are the risks?

Some incidents clearly involve an individual with bad intent deliberately targeting a vulnerable child to take and misuse images. These images may be uploaded to social media or shared with other likeminded individuals or groups motivated by sexual interest.

Occasionally, these images are also used to threaten and force the child into unwanted, illegal sexual activity.

Upskirting, although not specific to changing rooms, is a risk in this setting and is a distressing violation of privacy. It is where someone takes a picture under a person's clothing without their permission and or knowledge. This is now a criminal offence in England and Wales.

Taking and sharing images like this may form part of wider bullying of the targeted young person by other young people, motivated more by a wish to cause humiliation and embarrassment.

Even in the context of a shared joke among friends, without abusive intent, a young person taking and sharing inappropriate images may be committing a serious offence and risk criminal prosecution.

Minimising the risks

imposing a ban on photography of any form in these areas of the facility (regardless of rules that apply in other areas). Such bans cover participants, spectators, all staff and volunteers.

It can be difficult to be sure whether someone using a mobile phone is taking photos or videoing their environment. So the use of mobiles and other equipment capable of taking images altogether should not be used in toilets or showers at SPS.

It's important that all users, staff and volunteers within the facility understand the information above on photography. Communicated through clear signage, posters and ensuring all coaches and volunteers read and sign this policy.

13. Responding to concerns

Everyone should be made aware of what they should do if they have concerns about the behaviour of any other person in this context.

If anyone is suspected of taking images of children (or adults) in a state of undress, the lead coach on duty or the welfare officer should be informed immediately and if needed the police consulted.

14. For information

With the widespread use of smartphones, tablets and other equipment that can take photos, there are challenges in seeking to impose an outright ban on photography by parents and spectators.

Clear communication to all parties is key to this approach, together with well-publicised systems for anyone to raise concern about breaches of these rules.

A ban may be very unpopular with parents and other spectators who wish to record the efforts and achievements of their children or friends. A compromise is to let them have access to official photographs of the event.

At present organisers have no right to impose these rules on other members of the public accessing or using the same public spaces, however the use of taking or storing inappropriate photos or images is against the law and must be reported to the police

The taking of images of children taken in changing areas or toilets. Or images taken in ways or from angles that suggest inappropriate or abusive intent - for instance, when a camera or other device is operated at ground level while pointing up girls' skirts must be reported to the police and the welfare officer.

Organisers should have in place when public event clear ways for anyone to report concerns they have about photography or any other aspect of children's wellbeing the minimum would be clear signage on rules of photo taking and a contact number of reporting any concerns

Appendix 1

Photography and filming consent form

[Replace this text with name of club or organisation]

In accordance with our child protection policy, we will not permit photographs, video or other images of young people to be taken without consent. If the child is under 16, consent must be obtained from a parent / carer.

(If the child is over 16, it's good practice to inform parents that photographs and/or videos of their child may be used if the child has given consent.)

[Name or club or organisation] will take all steps to ensure these images are used solely for the purposes for which they are intended. If you become aware that these images are being used inappropriately, please inform us immediately.

Name of child		Age	
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Declaration of consent – child aged 16 or over

Please tick each box (or strike out what you do not consent to), then sign this form.

- I give permission for my photograph to be used within the club for display purposes.
- I give permission for my photograph to be used within other printed publications.
- I give permission for my photograph to be used on the club's website.
- I give permission for my photograph to be used on the club's social media pages.
- I give permission for video of me to be used on the club's website.
- I give permission for video of me to be used on the club's social media pages.
- I give permission for video of me to be used for training or analysis purposes.

Signature		Today's date	
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Declaration of consent – parent / carer of child under 16

Please tick each box (or strike out what you do not consent to), then sign this form.

- I give permission for my child's photograph to be used within the club for display purposes.
- I give permission for my child's photograph to be used within other printed publications.
- I give permission for my child's photograph to be used on the club's website.
- I give permission for my child's photograph to be used on the club's social media pages.
- I give permission for video of my child to be used on the club's website.

I give permission for video of my child to be used on the club's social media pages.

I give permission for video of my child to be used for training or analysis purposes.

I confirm that I have read, or been made aware of, how these images or videos will be stored within the organisation.

Signature	<i>x</i>	Today's date	
Print name			