



Blairgowrie Tennis Club

Photography, Film & Publicity Policy

Introduction

This policy provides guidance on how Blairgowrie Tennis Club (referred to in this document as 'BTC', 'the Club', we, our, or us) uses and publishes photographs and videos of our members. We want you to know that all the details we hold about you are safe and secure. We have created this policy so that you can make an informed decision before providing the Club with your consent to publish photographs.

Contact BNTCsecretary@gmail.com if you have any questions.

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Extract from our Privacy Policy

<https://ico.org.uk/for-the-public/does-an-organisation-need-my-consent/>

We may collect the following personal details about you before, during or after your time as a member, such as:

- videos and photos of you

The Club has 'legitimate interests' for processing personal information about individuals we interact with. Our main legitimate interest is to manage the Club and safeguard the integrity of the sport, eg. we need to process personal data to:

- market products and services (including performance and participation programmes, coaching courses and events), and promote tennis generally;
- ensure the security of LTA events and premises, including by recording individuals' photographs as part of event accreditation processes and capturing individuals' images.

Purpose and Scope

Blairgowrie Tennis Club strives to ensure that all children (anyone under 18) and adults at risk are safeguarded from abuse and have an enjoyable tennis experience.

The purpose of this policy is to:

- protect children/adults at risk who take part in Club's activities and events, specifically those where photographs and videos may be taken
- set out the overarching principles that guide our approach to photographs/videos being taken of children/adults at risk during our events and activities
- ensure that we operate in line with our values and within the law when creating, using, and sharing photographs/videos of children/adults at risk.

This policy applies to all staff, coaches, volunteers, players, parents/carers and any other individuals associated with the Club.

We Recognise That:

- sharing photographs/videos of our activities can help us celebrate successes and achievements, provide a record of our activities and raise awareness of our venue/county
- the welfare of the children/adults at risk taking part in our activities is paramount
- children/adults at risk, and their parents/carers have a right to decide whether their photograph/video is taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation
- agreement about taking photographs/videos of children/adults at risk is only meaningful when they, their parents/carers understand how the photographs/videos will be used and stored, and are fully aware of the potential risks associated with the use and distribution

- there are potential risks associated with sharing photographs/videos of children/adults at risk online.

Risks of Sharing Photos and Videos Online

Sharing photographs/videos of children/adults at risk on social media or other online platforms carries potential risks. For example:

- children/adults at risk may become vulnerable to grooming if a photograph/video is shared alongside information that makes them identifiable. This includes personal details; a tag with location information; visual details such as a school/venue uniform
- inappropriate photographs/videos may be shared online
- photographs/videos may be copied, downloaded, screenshotted or shared by anyone
- photographs/videos may be adapted and used inappropriately
- photographs/videos may appear in internet search results
- depending on the terms and conditions of using an online platform, the photographs/videos may be owned by the platform once it's been posted. Platforms may then license photographs/videos for use by third parties – such as for commercial purposes
- each photograph/video, and any comments on them, become a part of a person's public image.

We Will Seek to Keep Children/Adults at Risk Safe by:

- always explaining what photographs/videos will be used for, how they will be stored and what potential risks are associated with sharing photographs/videos
- if requested, take reasonable steps to remove any photographs/videos from public view and storage. It may not be possible to delete or destroy all photographs/videos that have been disseminated online (such as via social media) or in hard copy.
- using first names only
- never publishing personal information about children/adults at risk
- making sure children/adults at risk, their parents/carers understand how photographs/videos will be securely stored and for how long (including how we will control access to the photographs/videos and their associated information)
- reducing the risk of photographs/videos being copied and used inappropriately by:
 - only using photographs/videos of people in appropriate clothing
 - avoid photographs/videos and camera angles that may be prone to misinterpretation or misuse
 - avoiding full face and body shots of children/adults at risk taking part in activities where there may be a heightened risk of media being misused
- using photographs/videos that positively reflect involvement in sports activities
- undertake reasonable spot checks on personal devices to monitor compliance
- setting expectations around consent and the use of any personal devices among staff, volunteers and young players
- if children/adults at risk and parents/carers opt out of photographs/videos being taken, we will respect their wishes. We will agree in advance how they would

like to be identified so the photographer/videographer knows not to take pictures of them. We will not exclude someone from an activity because we do not have consent to photograph/video them. To opt out, see Appendix at the end of this document.

Photographs/Videos for Personal Use

Data protection law does not apply to the use of personal data for '**purely personal or household activity**'. This means that the law doesn't prevent you from taking photos or videos for personal use, such as for a family album (from ICO.org.uk).

Personal use and social media

If you post photographs/videos taken at the Club to your private social media account, only viewable by friends or family, this is likely to fall within the definition of personal use. This means data protection law does not apply.

However, if you post photos or videos to a public account, viewable by an indefinite number of people, this is likely to go beyond personal use. In this instance, you will need to be aware of your obligations under data protection law.

You are not necessarily prevented from posting images on a public account. However, you will need to consider whether individuals in the photos or videos would reasonably expect the images to be used in this way. Data protection law states that you must take extra care when using children's personal data, to ensure their interests are protected.

We strongly recommend that if you wish to take photographs/video you should seek permission from the parent/carer. We ask parents/carers NOT to post photographs/videos of other people's children on social media. Additionally, you should check the privacy settings of any social media accounts to understand who else can view or share any images.

The NSPCC provides examples of situations where sharing photos or videos could put certain people at risk of harm.

At some events, wide-angle and general photographs/videos of the event, the site, award ceremonies, and similar may be taken. In these circumstances, we will make clear to all participants and parents that these kinds of photographs/videos will be taken, and for what purposes.

If you have any concerns about the taking and/or sharing of photographs/videos, you can contact the Club Welfare Officer.

Photographs/Video for Wider use

Occasionally when local journalists or professional photographers attend an event and share photographs/videos in the local press or online, we will ensure they have been given proper permission. We will make reasonable efforts to: inform all participants and parents/carers that a photographer is present; ensure the photographer is easily identifiable; and inform the photographer of anyone who has opted out.

Concerns

If we become concerned that someone is taking photographs/videos, we reserve the right to ask them to delete the photographs/videos, ask them to leave and (depending on the nature of the concerns) follow our safeguarding procedures. If we become concerned that inappropriate photographs/videos have been taken, we will report this to the Club Welfare Officer and LTA Safeguarding Team. It may also be necessary to report this to the police.

Storing Photographs/Videos

- Electronic photographs/videos may be shared on Club social media sites or the website. We will store photographs/videos securely and in accordance with general data protection regulations
- Hard copies of photographs/videos may be displayed on Club notice boards or kept in a locked drawer.
- Photographs/videos will not be saved to the cloud from personal devices.
- Photographs/videos will not be repurposed for personal use.
- Photographs/videos no longer necessary will be deleted or anonymised.
- Photographs/videos will be stored in a password protected device.

Storage Limitation (Ref: ico.org.uk)

The Club may store photographs/videos indefinitely for historical research purposes. Data will be reviewed periodically and, if not required, permanently deleted or anonymised.

What Happens if This Policy Gets Changed?

The most up-to-date version of this policy is available on ClubSpark.

How You Can Get in Touch

You can get in touch with one of our team by emailing BNTCsecretary@gmail.com. If you have any queries about this policy, email GovernanceBTC@gmail.com.

Approved by	President: Shirley Davidson	Club Welfare Officer: Áine Fitzgerald
Date	4/4/24	4/4/24

Next review date: 3 yearly or as required

REVISION CONTROL/CHANGE HISTORY

Revision Date	Changes/Reason for change
16.9.18	Original release for GDPR compliance
19.11.20	Minor editorial changes.
March 2024	Policy rewrite according to new LTA templates. New CWO.



APPENDIX

Blairgowrie Tennis Club

Photograph/Video Opt-Out Form

Please complete this form if you **do not wish** The Club to take photos/video of you/your child(ren).

1. I, the undersigned, do not wish The Club to record me/my child(ren) for use in any form (including, but not limited to photos, videos, print, websites, blogs, internet).
2. I understand The Club will make reasonable efforts to comply with my request.
3. I am responsible for communicating my opt-out choice to Club staff.
4. If I become aware of a recording with my image, I will notify The Club and understand that they will make reasonable efforts to remove any images of me/my child(ren) from recordings.
5. I confirm I have read the above policy and am familiar with its contents.

Name:
Address:
Phone #:
Email:
Signature:
Signed
Date:
Event (if applicable):

FOR ALL CHILDREN/ADULTS AT RISK

I hereby confirm that I am the parent/carer of the child(ren)/adult at risk named below.

Parent/Carer Name:	
Child/Adult at Risk Name	Relationship
1	
2	
3	
4	
Signed:	Date:
Event (if applicable):	

Return to: Membership Secretary, any Coach, Event Organiser, or Committee Member