



BUNGAY TENNIS CLUB

Filming, Recording and Publishing Images Policy

Approved: 15 May 2023

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RECORDING AND PUBLISHING IMAGES POLICY

1. Introduction

This policy applies to everyone who attends or participates in Bungay Tennis Club (BTC) events and activities; and to anyone engaged in events and activities on behalf of BTC. These include:

- Staff
- Contractors including coaches, officials and professional photographers
- Volunteers including committee members, patrons and guests
- Players, parents¹ and other player support persons²
- Members of the public including spectators at events.

It is necessary to have a policy because the filming, recording and publishing of images can pose a risk to children and adults at risk of abuse. Thus this policy is part of the County's suite of safeguarding policies, and should be read in conjunction with the Suffolk LTA Safeguarding Policy, Anti-Bullying Policy and Code of Conduct.

BTC encourages players and parents to use photographic equipment to capture images of themselves and/or their child playing tennis and being engaged in tennis-related activities. Prior to any event, if someone wishes to take photographs or make recordings of anyone other than their own child, they should ensure they have obtained consent from the event organiser and the parents of all other children involved. See paragraph 3 below.

This policy sets out the rights and responsibilities of individuals who intend filming, recording and/or publishing images in hard copy and on the Internet; and the rights and responsibilities of individuals who may be the subject of such activities.

2. Why there is a need for caution with filming and recording

Sharing photographs and images of children on social media or other online platforms carries potential risks:

- Children may become vulnerable to grooming if a photograph is shared alongside information that makes them identifiable. This includes personal details; a tag with location information; visual details such as a school/club uniform.
- Inappropriate images of children may be shared online
- Images may be copied, downloaded, screenshotted or shared by anyone

¹ Or another with parental responsibility

² Any coach, trainer, manager, agent, representative, team staff, official, nutritionist, medical or paramedical personnel, any other person working with, treating or assisting a player, or any parent, guardian, carer, family member, relative, or other associate or supporter of a player (as defined in the LTA Approved of Conduct April 2022)

- Images of children may be adapted and used inappropriately
- Photos or videos may appear in Internet search results
- Depending on the terms and conditions of using an online platform, the image may be owned by the platform once it has been posted. Platforms may then licence images for use by third parties – such as for commercial purposes.
- Each photo or video, and any comments on them, become a part of a child's public image.

3. Consent

In order to obtain consent an explanation needs to be given by the person responsible for the filming/record as to why the images/recording is being made and what they will be used for. When obtaining consent for capturing and storing images, it should be stated for how long they will be kept. This ensures that parents are giving informed consent. Wherever practicable, consent should be given in writing.

4. Filming and Recording at a Tennis Venue

4.1 *Coaches, Competition Organisers, Officials and other Staff*

Before photographic equipment is used at an event by coaches, competition organisers or other officials, or an official photographer is used, it is necessary to obtain the consent of the competition organiser and all parents and children being filmed/recorded if the event is an BTC event and LTA registered venue event or otherwise at a private tennis venue. Wherever practicable, consent should be given in writing.

Using video equipment is a legitimate tool in tennis coaching. Suffolk County coaches will ensure that children and their parents are aware of this, and will adhere to all the requirements of this policy.

If the consent of the competition organiser is not obtained, the photographer may be asked to stop taking photographs/recording; delete any images/recordings they have made; and/or to leave the event.

4.2 *Parents, other player support persons, children and other people*

All parents, children, those supporting players and members of the public who want to use photographic equipment at an event should ensure they have obtained consent from:

- The event organiser, and
- Parents, carers of all children involved.

If they wish to take photographs at an event, or publish images following an event, they must ensure they have consent from parents and the children themselves, or the adult being photographed.

5. Filming and Recording in Public Spaces

It is best practice also to obtain consent if the event takes place in a public space but there is no law specifically prohibiting the photography of individuals including children in public places.

Provided the behaviour does not amount to harassment or a breach of privacy, individuals are permitted to:

- Take photos of children without the consent of the parent/legal guardian, using a normal lens; and
- Keep photos taken but, if the person wishes to publish a recognisable image of the child, they are required to gain consent from the parent.

Whether the behaviour amounts to harassment or a breach of privacy will depend on the facts in each case. In practice, you may not want to get into whether there has been a breach of privacy or if the conduct amounted to harassment. If an individual is taking photographs in a public space and this is making the children, coach or parents uncomfortable, you should stop taking photographs. If the photographer is not you, you should approach them and politely ask for them to stop. Please also remind them that they are obliged to gain consent parents if they wish to publish any images. If the photographer has a long lens, they should be informed they are not allowed to use this when taking photos of people in public spaces.

6. Photography and/or Filming/Recording for Wider Use

If people such as local journalists or professional photographers (not engaged by BTC) wish to cover an event and share the images professionally or in the wider world, permission must be obtained from the event organiser in advance. The following information must be provided in advance:

- The name and address of the person using the camera
- The names of children they wish to film (if known)
- The reason for taking the images and/or what the images will be used for
- A signed declaration that the information provided is valid and that the images will only be used for the reasons given.

The event organiser must verify these details and decide whether to grant permission for the photographs/films to be taken. They should also seek consent from the children who are the intended subjects of the images and their parents, and inform the photographer of anyone who does not give consent.

The event organiser must inform children and their parents that an external photographer is present and ensure the photographer is easily identifiable.

7. Using Official or Professional Photographers

When engaging a photographer for an event, BTC will:

- Follow a safe recruitment process/policy

- Provide the photographer with a clear brief about appropriate content and behaviour
- Ensure the photographer wears identification at all times
- Inform children and parents and other player support persons that a photographer will be at the event and ensure they give consent to images that feature close-up images of their child being taken and shared³
- Inform the photographer about how to identify and avoid taking images of children where there is not the required parental consent
- Clarify areas where all photography is prohibited (including toilets, changing areas, first aid areas)
- Not allow the photographer to have unsupervised access to children
- Not allow the photographer to carry out sessions outside the event or at a child's home
- Deal with any reports of concerns regarding inappropriate or intrusive photography.

8. Storage of images/recordings

BTC will store photographs and videos of children securely and in accordance with data protection law.

Hard copies of images will be kept in a locked drawer and electronic images in a protected folder with restricted access. Personal devices will be set so as to not to automatically upload images to the cloud.

Images of children will not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

Images will be deleted after use and will not be repurposed for other uses (for example, marketing or otherwise).

9. BTC will:

- Publish information on event programmes or announce details at the start of its events with regard to making images/recordings and publishing them⁴
- When using a professional photographer, it will meet the requirements of paragraph 7 above
- Always asking for written consent from a child and their parent before taking and using a child's image

³ At some events, wide-angle and general images of the event, the site, award ceremonies, and similar may be taken. It may not be reasonable, practical or proportionate to secure consent for every participating child in order to take such images. In these circumstances, Suffolk LTA will make clear to all participants and parents that these kinds of images will be taken, and for what purposes

⁴ Suitable messages may include information to children and young people such as: 'it is okay for a photographer to take photographs when you are on court, as long as you and your parent have told the photographer it is alright but, if you see someone filming or recording and you feel worried, tell your parent, an official or an adult you trust'

- If consent is withdrawn, it will take reasonable steps to remove the photos of the child from public view. It may not be possible to delete or destroy all images that have been disseminated online (such as via social media) or in hard copy.
- Only using first names of children, unless:
 - It is considered necessary – such as for elite/high profile child players.
 - It is demonstrably in the child's best interests.
 - The child and parent have consented (and been informed how, where, in what context an image might be used – for example public website or through social media, and are aware of potential risks)
- Never publish personal information about children
- Make sure children, their parents and carers understand how images will be securely stored and for how long (including how we will control access to the images and their associated information)
- Positively promote diversity in tennis with regard to age, gender, ethnicity and disability
- Reduce the risk of images being copied and used inappropriately by:
 - Only using images of children in appropriate clothing
 - Avoiding images and camera angles that may be more prone to misinterpretation or misuse than others
 - Avoiding full face and body shots of children taking part in activities where there may be a heightened risk of images being misused
 - Aiming for children featured in photographs/recordings to be shown in a group of other children/adults
 - Ensuring that children featured in photographs/recordings are shown engaging in tennis or tennis-related social activities
 - Using images that positively reflect children's involvement in the activity
 - Avoiding live streaming content directly to a website
 - Using business devices unless not practical/possible to do so and only using personal devices when it is justifiable and subject to spot checks to monitor compliance
 - Setting out clear expectations around consent and the use of personal devices to those who may be filmed/recorded and those who may do the filming/recording
 - Reviewing the stored images to decide whether there continued storage is necessary and legitimate if consent as to the duration of storage/use was not obtained at the time consent was given.

10. How to report concerns about filming, recording or publishing of images

If anyone has concerns about filming or recording being intrusive or inappropriate, or about the publication of images, this should be reported immediately to the event organiser, official or to the County Safeguarding Officer, who will follow the County Safeguarding Policy.