

## PHOTOGRAPHY AND FILMING BEST PRACTICE GUIDANCE

**This guidance is intended to supplement the LTA Photography Policy by assisting clubs and counties with their photography and filming practices.**

### RISKS OF SHARING IMAGES ONLINE

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

- 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
- 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's been posted. Platforms may then license 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.

### CLUBS AND COUNTIES SHOULD SEEK TO KEEP CHILDREN SAFE BY

- always asking for written consent from a child and their parents or carers before taking and using a child's image
- if consent is withdrawn, taking reasonable steps to remove the photos of the child from public view.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:
  - o it's considered necessary – such as for elite /high profile child players
  - o it's in the child's best interests
  - o the child and parent have consented (and been informed how, where, in what context an image might be used, e.g. public website, or through social media, and are aware of potential risks)
- never publishing personal information about children
- making 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)
- reducing the risk of images being copied and used inappropriately by:

- o only using images of children in appropriate clothing
- o avoid images and camera angles that may be more prone to misinterpretation or misuse than others
- o avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of images being misused
- using images that positively reflect children's involvement in the activity
- using business devices unless not practical / possible to do so. It is important that where personal devices are to be used, this is justifiable and not simply because that is the way it has always been done
- reasonable spot checks will take place on personal devices to monitor compliance
- expectations are clearly set around consent and the use of any personal devices among staff, volunteers and young players

### **PHOTOGRAPHY AND/OR FILMING FOR PERSONAL USE**

When children, parents/carers or spectators are taking photographs or filming at events and the images are for personal use, it is advisable to publish guidance on what will be allowed in the event programmes and/or announce details before the start of the event.

In the event that a player wishes to enter into a private arrangement with a commercial photographer or videographer, the photographer or videographer must have the express consent of that player (or their parent or legal guardian where the player is under 18 years old) and the LTA recommends that clubs and counties make any such photographer/videographer aware that they should be notifying the Competition Director of their attendance at the competition.

### **USING OFFICIAL OR PROFESSIONAL PHOTOGRAPHERS**

If a club or county engages a photographer for an event, it is advised that they:

- 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/carers that a photographer will be at the event and ensure they give written consent to images which feature close up images of their child being taken and shared\*
- inform the photographer about how to identify – and avoid taking images of children without the required parental consent
- clarify areas where all photography is prohibited (i.e. 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
- report any concerns regarding inappropriate or intrusive photography.

\*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, clubs and counties should make clear to all participants and parents that these kinds of images will be taken, and for what purposes.

### **PHOTOGRAPHY AND/OR FILMING FOR WIDER USE**

If people such as local journalists or professional photographers (not hired by a club or county) wish to operate an event and share the images professionally or in the wider world, clubs and counties should ensure they have given proper permission for this in advance.

Clubs and counties should ensure the following information is provided to them:

- the name and address of the person using the camera
- the names of children they wish to take images of (if possible)
- 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.

Clubs and counties should 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.

Clubs and counties must inform children, parents/carers that an external photographer is present and ensure they are easily identifiable.

### **CONCERNS**

If a club or county becomes concerned that someone unknown to them is taking photography or filming without permission, they should ask them to leave and (depending on the nature of the concerns) follow our safeguarding procedures.

Where inappropriate images/films are being taken that raise a safeguarding concern, this should be reported to the club Welfare Officer and LTA Safeguarding Team. It may also be necessary to report this to the police.

### **STORING IMAGES**

Clubs and counties must store photographs and videos of children securely and in accordance with data protection law.

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

Images of children should never be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

Images are deleted after use and not repurposed for personal use (e.g. marketing or otherwise);

When obtaining consent for capturing and storing images it should be stated how long images will be kept for.

If at the time consent was obtained there was no reference to storage, the images should be reviewed as to whether the images are still required to be stored and that storage is necessary and legitimate.

Access to images should be controlled, i.e. through a password protected folder

Images should not be kept longer than consent was given for. If images are deemed to be no longer necessary, they should be deleted.