

LTA PHOTOGRAPHY AND FILMING POLICY

The Isle of Man Lawn Tennis Association strives to ensure that all children, young people, and adults at risk are safeguarded from abuse and have an enjoyable tennis experience. This document sets out the policy of the Isle of Man LTA for the capture and use of photographic, video, or other images at the tennis competitions and tournaments run by the Isle of Man LTA. For the avoidance of doubt, these guidelines also apply to live broadcasts on social media or other platforms.

The Isle of Man LTA is happy to promote positive images of individuals playing tennis and is not preventing the use of photographic or videoing equipment. However, it is aware that some people may use sporting events as an opportunity to take inappropriate photographs or film footage.

This policy therefore will apply to all staff, coaches, volunteers and other individuals associated with the Isle of Man LTA who have responsibility for children, young people and vulnerable adults.

The Isle of Man LTA recognises that children and their parents/carers are responsible for making decisions about consent to have their images taken by others, and also about how these may be used. Consent is only truly meaningful when children and their parents have an understanding of the potential risks associated with the use and distribution of these images, particularly when shared online.

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.

ISLE OF MAN LTA WILL 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
 - 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
 - avoid 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 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.

PHOTOGRAPHY AND/OR FILMING FOR PERSONAL USE

Where children, parents/carers or spectators are likely to be taking photographs or filming at events and the images are for personal use, Isle of Man LTA will publish guidance on what will be allowed in the event programme and/or announce details of this policy before the start of the event to:

- remind parents/carers and children that they need to give consent for the Isle of Man LTA to take and use images of children;
- ask for photos taken during the event not to be shared on social media or ask people to gain permission from children and their parents/carers before sharing photographs and videos that include them;
- recommend that people check the privacy settings of their social media account to understand who else will be able to view any images they share;
- remind children, parents and carers who they can talk to if they have any concerns about images being shared.

The policy for a particular event might include:

- a total ban on any photography;
- registration of individuals who intend to take photos;
- photography ban for certain times/areas of the event;
- the event venue is in a public area, so no ban is possible however guidance on appropriate photography and reporting concerns will be made available. We will 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, Instagram, etc.) and care should be taken about 'tagging'.

The Isle of Man LTA will communicate the photography policy for the event by one of the following means:

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

USING OFFICIAL OR PROFESSIONAL PHOTOGRAPHERS

If the Isle of Man LTA engages a photographer for an event, we will endeavour to keep children safe by:

- following a safe recruitment process/policy
- providing the photographer with a clear brief about appropriate content and behaviour
- ensuring the photographer wears identification at all times
- informing 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*
- informing the photographer about how to identify and avoid taking images of children without the required parental consent
- clarifying areas where all photography is prohibited (i.e. toilets, changing areas, first aid areas)
- not allowing the photographer to have unsupervised access to children
- not allowing the photographer to carry out sessions outside the event or at a child's home
- reporting 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, the county will 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 the Isle of Man LTA) wish to operate an event and share the images professionally or in the wider world, the Isle of Man LTA will ensure they have given proper permission for this in advance.

This involves ensuring that the following information is provided to the Isle of Man LTA:

- 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.

The Isle of Man LTA will verify these details and decide whether to grant permission for the photographs/films to be taken. We will 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.

We will inform children, parents/carers that an external photographer is present and ensure they are easily identifiable.

Where it appears that someone unknown to us is taking photographs or filming without permission, they will be asked to leave and (depending on the nature of the concerns) we will follow our safeguarding procedures.

STORING IMAGES

The Isle of Man LTA 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.

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

Staff and volunteers must not use any personal devices/equipment to take photos and films of children.

RELATED POLICIES AND PROCEDURES

Isle of Man LTA Safeguarding Policy

Isle of Man LTA On-line Protection Policy

Isle of Man LTA Whistle Blowing Policy

This Policy and Code of Conduct is reviewed every three years (or earlier if there is a change in national legislation).

Isle of Man County LTA Chair: Brian Walton

Isle of Man County LTA County Safeguarding Officer: Ayesha Erani-Kirkham

Date: November 2022

Renew Date: November 2025