

SUNDRIDGE PARK

TENNIS • PADEL • SQUASH

Recording and Publishing Images Policy

Including Photography and
Filming Best Practice Guidance

Recording and Publishing Images Policy	Last Review Date: July 2022 (review/amendments by R Jones, H Maynard-Slade)
Written by LTA JD	Next Review Date: July 2023

Recording and Publishing Images Policy

Parents, carers and spectators

The Club encourages parents, carers and spectators to use photographic equipment to capture their child or friend playing tennis during general play or at an event to support and encourage their experience. Parents and carers are advised to avoid including children they do not know in their photographs or films.

Parents, carers and other spectators are required to register at an event if they wish to use photographic equipment. The event organiser will ask anyone not registered to stop using photographic equipment and delete any images that may have been taken.

The name and contact details of each photographer will be noted on our Photography and Media Consent Form.

If any parent, carer or spectator has concerns about inappropriate photography, this should be reported immediately to the event organiser, official or club welfare officer, who will follow child protection procedures.

Parents, carers and spectators should not publish images or post images on their personal social media accounts of children, or identify those children, without the child(ren)'s parents' permission.

Professionals, competition organisers and officials

The Club requests that all parents, carers and spectators who want to use photographic and recording equipment (including smartphone cameras) at an event are registered with us.

If you wish to take photographs at an event or publish images following an event you must ensure you have consent from parents, carers or the individual (if over 18) prior to the event and that you are registered with the event organiser.

If you see any individual taking photographs which you deem to be intrusive or inappropriate, report it immediately to the event organiser, official or club welfare officer, who will follow child protection procedures.

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Children and young people

It is OK for a photographer to take photos when you are on court, as long as your parent or carer has told the photographer it is alright.

If you see someone taking photos of you or filming you, and it makes you feel worried, tell your parent or carer or the event organiser or club welfare officer straight away.

Consent

If you wish to take photographs or recordings, prior to any event, you should ensure you have obtained consent from:

- the event organiser, and
- parents, carers of all children involved.

In order to obtain consent, you must explain why you are taking the images and what they will be used for. This ensures that parents or carers are giving informed consent. To achieve this, it is strongly recommended they also sign the Photography and Media Consent Form.

Photographing and recording

All children featured in photographs or recordings must be:

- appropriately dressed with clothing covering their torso from their neck to thighs, e.g. a T-shirt and shorts or skirt
- featured with people engaging in tennis
- recorded in groups with other children or adults where possible
- representative of the diversity across tennis, with regard to age, gender, ethnicity and disability.

Any inappropriate use of images should be reported to the LTA Safeguarding Team and the Police.

Photographing and recording in public spaces

There is no law specifically prohibiting the photography of individuals (including children) in public places. Individuals are permitted to:

- take photos of children without the consent of the parents/legal guardians, using a normal lens; and
- keep photos taken.

However, if the person wishes to publish a recognisable image of the child, they are required to gain consent from the parents/legal guardian.

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This is permitted, provided the behaviour does not amount to harassment or a breach of privacy. Whether the behaviour amounts to harassment or a breach of privacy will depend on the facts in each case.

In practice, you might 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, it is best to approach the photographer and politely request they stop taking photographs and remind them they are required to gain consent from parents if they wish to publish any photos.

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.

Publishing images

Remember to give adequate thought to the selection of images in publicity material, both printed and web-based. Where possible, use a technique such as “watermarking” on the images.

- All children featured can only be identified using their first name, although it is preferable that their name is not given at all.
- Photos should be printed or uploaded with written consent from parents/carers.
- Photos should show children engaging in tennis activities.

For your safety it is recommended that you avoid the following:

- Images of children and young people on their own
- Images of children and young people outside a tennis environment
- Streaming any content directly to a website
- Using any images for which you have not obtained consent (please use the Photography and Media Consent Form).

Please be aware, coaches, teachers and others may use video equipment as a legitimate coaching method. Tennis players and their parents or carers should be made aware this forms part of the tennis programme and that any recording will be destroyed after use.

This Policy will be reviewed annually or more frequently if required, to ensure that it remains relevant and appropriate.

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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 and 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 prone to misinterpretation or misuse

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- 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.

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). 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.

Use of 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 children and avoid taking images of children where there is not 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.

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Photography and/or filming for wider public 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 and carers that an external photographer is present and ensure they are easily identifiable.

Concerns

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

Where inappropriate images/films are being taken that raise a safeguarding concern, this should be reported to the Club Welfare Officer(s) 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. 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.

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Related policies

Sundridge Park Tennis and Squash Ltd has several Safeguarding policies. Those most relevant to this policy and available on our website are:

- Safeguarding Policy Statement
- Safeguarding Policy
- Online Safety and Communication Policy, including Social Media Policy
- GDPR: Personal Data Policy
- Whistblowing Policy

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