

## Guidance on the Use of Photographic Equipment

It is important to acknowledge that parents may wish to take photographs or videos of their own children participating in snowsport. Clubs may want to take photos to promote their activities and increase participation and coaches may also wish to video club members as this is a useful coaching aid. This guidance applies whether images are taken using cameras, video cameras, mobile phones or any other equipment. The introduction of proportionate controls on the use of photographic equipment is part of general safeguarding good practice in a club. All clubs will have different facility access and needs, which is why each club must create their own policy.

### Key Concerns

The key concerns regarding the use of images of children/young people relate to:

- The possible identification of children when a photograph is accompanied by personal information which can (and has) led to children being groomed
- The identification and locating of children at risk; for example, because they have been removed from their family for their own safety, or there are restrictions on family contact following parental separation, or because they are a witness in criminal proceedings
- The inappropriate use, adaptation or copying of images for use on child pornography or illegal websites.
- The taking of inappropriate or unauthorised photographs or recorded images of children

Clubs need to be aware there have been concerns about the risks posed directly and indirectly to children through the use of photographs on sports websites and other publications. Photographs can be used as a means of identifying children when they are accompanied by personal information including name, school and other personal information. Images can be searched for using face recognition tools, or by name search tools.

Whilst Snowsport England recognises that publicity and pictures/recordings of children and young people enjoying snowsport is essential to promote the sport and a healthy lifestyle, the following guidelines should be observed.

### Club Activities

- There should be signed consent on club membership forms for parents and the children to show their consent to **opt-in** to photographs and video recordings being made
- All children featured in recordings must be appropriately dressed for the activity they are participating in
- The photograph or recording should focus on the activity rather than a particular young person and personal details which might make the young person vulnerable, such as their exact address should not be revealed
- Where a photo is used, the name should not be used (unless specific permission obtained and it is a Regional or National event)
- Clubs, coaches and volunteers should be allowed to use video equipment as a legitimate coaching aid and means of recording special occasions, however care should be taken in the dissemination and storage of the material and this must be done in line with GDPR requirements and the Data Protection Act 2018. It is recommended club equipment is used for these purposes and images are not stored on a coach's private mobile phone, I pad or video camera

- You should not use any images of a child or young person known to be the subject of any court order or who has denied you their consent. This applies to the club and any official photographer you use. In such cases a discussion needs to take place with the child and/or parent to agree a safe plan as it may not be possible or proportionate to deny all parents the opportunity of taking photos of their own children, which could inadvertently have other children in the frame.
- Parents and spectators taking photographs/recordings should be prepared to identify themselves if requested and state their purpose for photography/ filming. An appropriate response would be that they are filming their own child
- Any instances of the use of inappropriate images should be reported to the Club Welfare Officer or to Snowsport England Safeguarding Lead and to Children's Social Care or the Police.
- Parental consent may be withdrawn at any time and the club should take all reasonable steps to respect the wishes of the child or parent.

### **Publishing Photographic and Recorded Images**

- If a photograph is used, avoid naming the child. Personal details of children such as an email address, home address and telephone numbers should never be revealed on a website or in print.
- If you name a child in an article, do not include their picture
- Think about the level of consideration that you give to the use of images in all publications, for example the process used in choosing photographs for a publicity brochure for the club. Apply an increased level of consideration to the images of children used on websites.

### **Regional and National Events**

It should be made clear that members of the press may be present, or photographs may be taken for publicity purposes by the Organisers. All club and official photographers must make every effort not to publish any images of children if consent has not been given. The details of any child (e.g. name and bib number) for whom consent has not been given must be brought to the attention of the official photographer and relevant staff responsible for publicising the event. However, it is not possible to guarantee images will not be taken or published by members of the public, on snow or at public slopes and it would not be possible or proportionate to stop parents and others posting images of their own children (which may include other children in the background). This should be made clear to all entrants. See the Event Photography Policy. With the written consent of individuals and their parents, it may be appropriate to publish positive images of children alongside their name, club and age/year of birth for Regional or National Competitors, if consent for this has been obtained on the Entry Form. You must ensure other details are not given, for example school, address, date of birth etc.

### **Guidelines for the Official Photographer**

Provide a clear brief about what is considered appropriate in terms of content and behaviour. Ideally this should be in writing before the event.

- Issue the photographer with ID which must be worn at all times
- Inform the children and parents that a photographer will be in attendance and ensure you have obtained permission from parents for photographs and videos to be taken where their child can be identified (e.g. individual photographs, close ups, small group and team photos).

- Inform the official photographer and staff responsible for posting photographs and videos on social media, website or newsletters of any children for whom consent has not been given. Organisers must make every effort to ensure photos and videos of these children are not taken or publicised.
- The photographer may wish to take a wide angle, general photograph of the slope, of course inspection etc. Parents should be warned that this type of photograph may be taken
- Do not allow unsupervised access to children or one to one photo sessions at events
- Ensure if photographs can be viewed on the day, that children give their parent's email address and not their own, to the photographer for photos to be e mailed to them
- Any other professional photographers attending the event (e.g. local press, TV etc) must seek accreditation with the event organiser by producing their professional identification for the details to be recorded. This should ideally be done a week before the event. NB if it is a public slope you can request this but may be unable to enforce it.
- The organisation should determine who will hold the images recorded and what is to be done with them after they have served their purpose, in line with GDPR and Data Protection Act 2018 requirements.
- Many of the official photographers used within snowsport make the photographs available for purchase for some time after the event. Consideration must be given to ensure this is in line with good safeguarding practice and GDPR/DPA 2018 requirements. This information should be made available to parents, and it is suggested this is in pre-competition information and on the entry form.
- Ideally accreditation should include: name and address of person; names of subjects they are filming/photographing (if specific people); the reason the images are being taken, or where they will be used and a signed declaration that the information is valid and that the images will only be used for the reasons given.

## **Data Protection**

Photographs are considered "personal data" in terms of the Data Protection Act (DPA) 2018. Therefore, consent should be sought (in line with guidance above) before taking, sharing or publishing images where a child can be identified. In addition, as with all personal data you process, it should be processed, stored and disposed of in accordance with the principles laid out in the DPA. GDPR and other relevant legislation and requirements.

Photographs taken of children by their parents clearly do not come under the DPA.

See Template Section for examples of Photographic Policies and notices.