

## Snowsport England Photography and Recorded Images Policy

# Draft Policy

Waiting for Board Approval

Policy Date:

Review Date: 2 years

## Snowsport England Photography and Recorded Images Policy

Snowsport England recognises that publicising and promoting the activities of children, young people and adults in Snowsport is essential to promote the sport and a healthy lifestyle and is keen to promote positive images of participants. We also recognise that sharing photographs and images on social media platforms must be managed appropriately in line with good safeguarding practice.

Snowsport England believes that children, young people and adults should never experience abuse of any kind. We have a responsibility to promote the welfare of all participants when taking, sharing and using images. Snowsport England may take photographs and videos for promotional, publicity, coaching or analysis purposes. These images may appear across all media platforms, including, but not limited to, Snowsport England social media channels, website and You Tube platforms, e mails, newsletters and PR.

### **The purpose of this policy is to:**

- Set out overarching principles that guide our approach to photographs and videos being taken during our events and activities
- Ensure we operate in line with our values and within the law when creating, using and sharing images
- Protect children, young people and adults at risk who take part in the activities of Snowsport England, specifically where photographs and videos may be taken.

This policy statement applies to all staff, volunteers and other adults associated with Snowsport England.

### **Snowsport England recognises that:**

- Sharing photographs and videos of our activities can help us celebrate the successes and achievement of all our participants, provide a record of our activities and raise awareness of our organisation
- The welfare of all our participants including children, young people and adults at risk taking part in our activities is paramount
- All participants, including children, parents and carers and adults have the right to decide whether their images are taken and how they may be used
- Consent to take images is only meaningful when children, their parents and carers and adults understand how their images will be used and stored, and are fully aware of the potential risks associated with the use and distribution of these images
- There are potential risks associated with sharing images of children and young people on line
- There is no legal power to prevent photography or filming in a public place.

### **Risks to children include:**

- Some children may be at increased risk of harm if their images are shared and their whereabouts known; for example a child in care, or they or their family having experienced abuse
- Images may be copied, downloaded, screen-shotted or shared by anyone
- Images of children may be adapted and used inappropriately
- Images and videos may appear in internet search results
- Images and comments on social media become part of a young person's public image. This may affect them in later life, for example how they see themselves or how others view them (for example prospective employers or sponsors)
- Children may be vulnerable to grooming if their images are shared alongside personal information that may identify them. For example publicising their name or club, including visual details that might identify them (eg club sweatshirts).

We will seek to keep children and young people safe by:

- Publicising at our events if we will be taking images and videos of participants present
- Explaining what images will be used for
- Seeking permission if we name a child or young person alongside an image
- Making it clear that if a child or their family withdraws consent for an image to be shared it may not be possible to delete images that have already been shared or publicised
- Only using images of children and young people in appropriate clothing
- Using images that positively reflect young people's involvement in the activity
- Ensuring participants know how to report the abuse or misuse of images
- Ensuring official photographers wear identification badges
- Reporting concerns regarding inappropriate or intrusive photography following our child protection procedures in **SnowSafe** Children and Young People.

As athletes become more talented it is recognised their achievements can lead to an increased public profile. Athletes may welcome positive media coverage on a local, regional or national level as this could, for example, lead to opportunities for sponsorship. Snowsport England may wish to promote their achievements in line with this policy.

Snowsport England does not wish to stop parents filming their own children but are asked not to share photographs and videos of other children unless they have consent from the child and their parents.

### **Adults at Risk**

Snowsport England recognises that adults at risk (as defined by the Care Act 2014), may need additional safeguards in place. Some of the risks to children mentioned above, may apply to them. Where an adult at risk is the main subject of a photograph or image, or would be recognised, Snowsport England will endeavour to obtain permission before publicising the image. Any adult not wishing to be photographed or named with their photograph should

make their wishes known to the event welfare officer or designated person at the event. Snowsport England will make every effort not to include them, but cannot guarantee this.

### **Events Specifically for People With Care and Support Needs**

At any event organised specifically for people with care and support needs additional measures will be applied.

- Information about how images at the event will be used will be provided to adults in an accessible format (where possible)
- The adult will be asked to consent to their image being used
- Family members such as parents, siblings, spouses and support workers or personal assistants will not be approached to sign consent forms on behalf of adults with care and support needs. Legally the only person who can offer consent for the use of their image is the adult themselves
- If Snowsport England has any concerns about an adult not having the capacity to consent, or understanding about the use of their images, they will discuss this with the adult and if appropriate, their support person
- If after this conversation Snowsport England feels the adult still cannot give consent, their photograph or image will not be used.

### **Public Events**

Many of our events take place on public slopes or abroad where it is not possible to prevent the general public from taking photographs and videos and participants will need to decide for themselves whether or not they wish to partake in such an activity. At these events Snowsport England may wish to take wide-angled, general images of the event, opening and closing ceremonies etc. It is not usually reasonable, practical or proportionate to get consent for everyone present, or to preclude photography on the basis of the concerns of a small number of people. In these circumstances, event organisers will make it clear to all participants that these kinds of images will be taken, and for what purpose.

We will only use photographs and recorded images in line with this policy. If other organisations or individuals wish to film or record our events they are requested to seek permission before the event, to enable Snowsport England to inform participants.

### **Snowsport England Squads**

Snowsport England will seek written permission from all squad participants and parents (if participant is under 18) to take and publish photographs and recorded images and name the participant alongside the image.

### **Snowsport England Events and Competitions**

Participants should be aware that a photographer or the media may be present at some of our events. Some events are public venues over which we may have no jurisdiction.

At a Snowsport England event, the event photographic policy will be publicised and available. Consent for taking photographs will be obtained, usually on the registration form. Snowsport

England aims not to publish a photograph alongside the name of a child under 18 unless they have consented, and their parent/guardian has consented. Consent will usually be written but on occasions we may seek verbal consent. We do not require the consent of parents if the young person is 16 or over, but consent will usually be sought.

If a child or young person under 18 is named alongside their photograph, other identifying features such as School, Address, date of birth etc will not be revealed.

Snowsport England will from time to time invite participants to submit photographs and videos for online competitions, or promotional or publicity purposes. Consent will be obtained to use these images and, where applicable, publish the name alongside the images.

### **Storage and Disposal of Recorded Images**

Snowsport England will store, use and dispose of photographs and recorded images in accordance with GDPR principles and the Data Protection Act 2018.

### **Withdrawing Consent:**

Anyone wishing to withdraw consent for an image or recorded image to be used should contact the Event Welfare Officer if it relates to a live event, or the Snowsport England Marketing and Insight Lead if it relates to previously published images. Snowsport England will endeavour to remove images but individuals should recognise it is not always possible to remove images that are already in the public domain.

### **Concerns about the Use of Photographs and Recorded Images**

Any concerns about the use of images should be reported to the Event Welfare Officer immediately or the Snowsport England Safeguarding Lead. Concerns about professional photographers must be reported to Snowsport England, and the photographer's employer. If the concerns are potentially criminal behaviour, they should be reported to the Police.

### **Guidance for Clubs for a Photography and Recorded Images Policy**

Snowsport England provides guidance in the SnowSafe Toolkit for clubs, and a template policy to adapt. Clubs would be expected to gain written consent to take and publish images for all their members, usually via the yearly registration form.

### **Additional Considerations**

This Policy should be read alongside our Organisational Policies and Procedures including **SnowSafe** Children and Young People and **SnowSafe** Adults.

### **Contact Details**

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