



**WILTSHIRE
TENNIS**

Photography and Filming Policy

See also the following related policies:

<i>Wiltshire Tennis</i>	<i>LTA</i>
<i>Safeguarding Policy</i>	<i>Safeguarding Policy</i>
<i>Trips Policy</i>	<i>Safeguarding at events, activities and competitions guidance</i>
<i>Use of Changing Rooms Policy</i>	<i>Use of Changing Rooms Policy</i>
<i>Anti-bullying Policy</i>	<i>Code of Conduct</i>
<i>Online Safety and Communications Policy</i>	<i>Online Safety and Communications Policy</i>
<i>Diversity and Inclusion Policy</i>	<i>Safeguarding Guidance for Livestreaming Activities</i>
<i>Safe Recruitment Policy</i>	<i>Safeguarding Guide for County Cup and League Matches</i>

Version	2.1
Date created	May 2023
Custodian	Liz Lewis, CSO
Approver	Philip Evans, Chairperson
Review date	April 2026

Background

Wiltshire Tennis strives to ensure that everyone, especially children, young people and adults at risk, is safeguarded from abuse and has an enjoyable tennis experience.

Aim

This document sets out Wiltshire Tennis' policy for the capture and use of photographic, video or other images at our events, activities and competitions. For the avoidance of doubt, these guidelines also apply to live broadcasts on social media or other platforms.

Objectives

Wiltshire Tennis is keen to promote positive images of individuals playing and supporting tennis. **Other than at county training camps, where photography and filming is forbidden**, it does not prevent the use of photographic or videoing equipment. However, it strives to prevent people using sporting events as an opportunity to take inappropriate photographs or film footage or mis-use any images. We strive to ensure that friends, family, volunteers and other participants in our events, activities and competitions have the opportunity to limit the use of their personal image.

Using the document

This policy is based around the LTA template Photography and Filming Policy (January 2023). The county's practical interpretations follow, divided into six sections, A – F below, and supported by five Appendices containing guidelines regarding: Image and Video Content, Coaching Videos, Publicity Material, Data Protection and Contacts.

Section A: 'Official' Photography, by an LTA Approved photographer/videographer.

Section B: 'Designated' Photography, by and for Wiltshire Tennis.

Section C: 'Informal' Photography by a parent/guardian/close family member for personal use.

Section D: Video images captured for coaching purposes.

Section E: Photography by official media outlets.

Section F: Private arrangements between players and commercial photographers or videographers.

Please read the supporting Appendices 1 to 5 as well as Sections A to F.

PHOTOGRAPHY AND FILMING POLICY V. 1.2 JANUARY 2023

PURPOSE AND SCOPE

Wiltshire Tennis strives to ensure that all children (anyone under 18) and adults at risk are safeguarded from abuse and have an enjoyable tennis experience.

The purpose of this policy is to:

- protect children who take part in Wiltshire Tennis's activities and events, specifically those where photographs and videos may be taken
- set out the overarching principles that guide our approach to photographs/videos being taken of children during our events and activities
- ensure that we operate in line with our values and within the law when creating, using and sharing photographs/videos of children.

This policy applies to all staff, coaches, volunteers, players, parents/carers and any other individuals associated with Wiltshire Tennis.

WE RECOGNISE THAT:

- sharing photographs/videos of our activities can help us celebrate the successes and achievements of our children, provide a record of our activities and raise awareness of our venue/county
- the welfare of the children taking part in our activities is paramount
- children, their parents/carers have a right to decide whether their photograph/video is taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation
- consent to take photographs/videos of children is only meaningful when children, their parents/carers understand how the photographs/videos will be used and stored, and are fully aware of the potential risks associated with the use and distribution
- there are potential risks associated with sharing photographs/videos of children online.

RISKS OF SHARING PHOTOGRAPHS/VIDEOS ONLINE

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

- children may become vulnerable to grooming if a photograph/video is shared alongside information that makes them identifiable. This includes: personal details; a tag with location information; visual details such as a school/venue uniform
- inappropriate photographs/videos of children may be shared online
- photographs/videos may be copied, downloaded, screenshotted or shared by anyone
- photographs/videos of children may be adapted and used inappropriately
- photographs/videos may appear in internet search results
- depending on the terms and conditions of using an online platform, the photographs/videos may be owned by the platform once they have been posted. Platforms may then license photographs/videos for use by third parties – such as for commercial purposes
- each photograph/video, and any comments on them, become a part of a child's public image.

WE WILL SEEK TO KEEP CHILDREN SAFE BY

- always asking for written consent from a child and their parents/carers before taking and using a child's photograph/video
- always explaining what photographs/videos will be used for, how they will be stored and what potential risks are associated with sharing photographs/videos of children
- if consent is withdrawn, take reasonable steps to remove the photographs/videos of the child from public view. It may not be possible to delete or destroy all photographs/videos that have been disseminated online (such as via social media) or in hard copy.
- only using first names of children, unless:
 - it's considered necessary – such as for elite /high profile child players
 - it's in the child's best interests
 - the child and parent have consented (and been informed how, where, in what context a photograph/video might be used, e.g. public website, or through social media, and are aware of potential risks)
- never publish personal information about children
- making sure children, their parents/carers understand how photographs/videos will be securely stored and for how long (including how we will control access to the photographs/videos and their associated information)
- reducing the risk of photographs/videos being copied and used inappropriately by:
 - only using photographs/videos of children in appropriate clothing
 - avoid photographs/videos and camera angles that may be prone to misinterpretation or misuse
 - avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of photographs/videos being misused
- using photographs/videos 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
- undertake reasonable spot checks on personal devices to monitor compliance
- setting expectations around consent and the use of any personal devices among staff, volunteers and young players
- if children and parents/carers do not consent to photographs/videos being taken, we will respect their wishes. We will agree in advance how they would like to be identified so the photographer/videographer knows not to take pictures of them. We will not exclude a child from an activity because we do not have consent to photograph/video them.

PHOTOGRAPHY AND/OR FILMING FOR PERSONAL USE

When children, parents/carers or spectators are taking photographs/videos for personal use:

- photographs/videos captured by the parent or carer (or another adult with the express permission of the parent or carer) of the child is permitted
- we will recommend that people check the privacy settings of their social media account to understand who else will be able to view any photographs/videos they share
- we will remind children, parents/carers who they can talk to if they have any concerns about photographs/videos being shared.

For specific events we run, we will publicise what will be allowed before the start of the event.

If 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 will notify the venue (including the Competition Organiser/Director for any event) of their attendance in advance.

USING OFFICIAL OR PROFESSIONAL PHOTOGRAPHERS

If Wiltshire Tennis engages a photographer/videographer for an event, we will:

- follow a safe recruitment process
- provide the photographer/videographer with a clear brief about appropriate content and behaviour
- ensure the photographer/videographer wears identification at all times
- inform children and parents/carers that a photographer/videographer will be at the event and ensure they give written consent to any close-up photographs/videos of their child*
- inform the photographer/videographer about how to identify – and avoid taking photographs/videos of children without the required parental consent
- clarify areas where all photography/filming is prohibited (i.e. toilets, changing areas, first aid areas)
- not allow the photographer/videographer to have unsupervised access to children
- not allow the photographer/videographer to carry out sessions outside the event or at a child's home
- report any concerns regarding inappropriate or intrusive photography/filming.

*At some events, wide-angle and general photographs/videos 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 photographs/videos. In these circumstances, we will make clear to all participants and parents that these kinds of photographs/videos will be taken, and for what purposes.

PHOTOGRAPHY AND/OR FILMING FOR WIDER USE

If people such as local journalists or professional photographers wish to operate at an event and share photographs/videos, we will ensure they have been given proper permission in advance and that they have provided us with the following information:

- the name and address of the person using the camera
- the names of children they wish to take photographs/videos of (if possible)
- the reason for taking the photographs/videos and/or what they will be used for
- a signed declaration that the information provided is valid and that the photographs/videos will only be used for the reasons given.

We will verify these details and decide whether to grant permission for the photographs/videos to be taken. We will also ensure the children who are the intended subjects of the photographs/videos and their parents have given consent and inform the photographer of anyone who does not give consent.

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

CONCERNS

If we become concerned that someone is taking photographs/videos without the necessary consent, we reserve the right to ask them to delete the photographs/videos and may ask them to leave and (depending on the nature of the concerns) follow our safeguarding procedures.

If we become concerned that inappropriate photographs/videos have or are being taken, this will be reported to the Welfare Officer and LTA Safeguarding Team. It may also be necessary to report this to the police.

STORING PHOTOGRAPHS/VIDEOS

We will store photographs/videos of children securely and in accordance with data protection law.

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

Photographs/videos of children will not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

Photographs/videos will be deleted after use and not repurposed for personal use (e.g. marketing or otherwise);

When obtaining consent for photographs/videos, we will state how long they will be kept for.

Access to photographs/videos will be controlled, i.e. through a password protected folder

Photographs/videos which are deemed to be no longer necessary will be deleted, and in any event, will not be kept longer than consent was given for.

RELATED POLICIES AND PROCEDURES

This policy should be read alongside Wiltshire Tennis policies and procedures, including:

- Anti-Bullying
- Code of conduct
- Diversity and Inclusion
- Online safety and communication
- Use of changing rooms
- Safeguarding policy
- Safeguarding at events, activities and competitions
- Safe recruitment

This policy is reviewed every three years (or earlier if there is a change in national legislation).

Chairperson: Philip Evans

Date: 3rd May 2023

County Safeguarding Officer: Liz Lewis

Date: 3rd May 2023

Practical interpretations by Wiltshire Tennis

Section A: 'Official' Photography, by an LTA Approved photographer or videographer.

The LTA approved photographer or videographer will be clearly identifiable.

Wiltshire Tennis will only approve an official photographer through a safer recruitment process. (See also our Safer Recruitment Policy).

Participants will be informed in advance where official photography and filming will be taking place (usually via the Online Tournament Entry Terms and Conditions) and written consent sought.

Individuals must not hold themselves out to be official LTA photographers unless they have been appointed to such a position by the LTA, this appointment having been explicitly confirmed in writing and available for inspection.

The name of the LTA Approved photographer will be recorded on the Photography Registration Sheet, provided by the organisers at the start of the event.

Wiltshire Tennis will provide a sign informing players/spectators if an official competition photographer is present.

No other professional photography or filming shall be permitted **unless**:

1. The images are captured with the express permission of:
 - a) the relevant player(s); or
 - b) where the player is under 18 years old, the images are captured by the parent or legal guardian of the player or with the express permission of the parent, legal guardian or team captain (having obtained the parent/ legal guardian's permission) of the relevant player(s); and
2. The player, parent or coach has notified the Tournament Director and/or Referee of the LTA Approved Competition via the Registration by signing the Photography Registration Sheet provided by the organisers, and has obtained the relevant permissions.

For the avoidance of doubt, the capture of images for commercial gain is not permitted in any circumstances.

End of Section A

Section B: 'Designated' Photography, by and for Wiltshire Tennis.

This will be carried out by a designated member of the event support team or county official (e.g. Referee, Executive Committee member) taking pictures, such as the prize- giving photos or other event activities, who will be clearly identifiable.

Individuals will be informed in advance where designated photography and filming will be taking place (usually via the Online Tournament Entry Terms and Conditions where written consent will be sought, or at the start of the event/activity).

The 'Designated Photographer' will have an accepted DBS check.

Individuals must not hold themselves out to be designated Wiltshire Tennis photographers unless they have been appointed to such a position by Wiltshire Tennis and this appointment can be explicitly confirmed by the event organiser or County Safeguarding Officer.

The name of the designated photographer will be recorded on the Photography Registration Sheet, provided by the organisers at the start of the event.

Images will be captured with the express permission of: a) the relevant player(s)/participant(s);
or

b) where the player is under 18 years old, the images are captured by the parent or legal guardian of the player or with the express permission of the parent, legal guardian or team captain (having obtained the parent/ legal guardian's permission) of the relevant player(s).

Wiltshire Tennis designated photographers will not use photographic equipment with lenses of more than 300mm when extended.

End of Section B.

Section C: 'Informal' Photography by a parent/guardian/close family member for personal use.

Images may be captured by a parent/legal guardian or close family member for personal use, but this should not be with photographic equipment with lenses of more than 300mm when extended.

We recommend that people check the privacy settings on their social media accounts to understand who else will be able to view any photographs/videos they share.

If anyone, especially children, parents and carers, has any concerns about photographs/videos being shared, please talk to Liz Lewis, County Safeguarding Officer (+44 1793 397499) or the Welfare Officer at your own club/venue.

The images may only be captured with the express permission of:

1. a) the relevant player(s)/participant(s); or
b) where the player is under 18 years old, the images are captured by the parent or legal guardian of the player or with the express permission of the parent, legal guardian or team captain (having obtained the parent/ legal guardian's permission) of the relevant player(s); and
2. the player, parent or coach has notified the activity organiser, Tournament Director and/or Referee of the LTA Approved Competition before the start of the match, by signing the Photography Registration Sheet provided by the organisers, and has obtained the relevant permissions.

For the avoidance of doubt, where photography/moving image includes children/adults-at-risk other than your own family, permission must be obtained beforehand from the relevant parent/carer.

Where no such permission is obtained and 'incidental' images exist, these must be deleted.

End of Section C.

Section D: Video images captured for coaching purposes.

Images may only be captured by a player, their parent/guardian or their coach.

Where any player, their parent or coach requests to film a match or coaching session for video analysis purposes, the following must be adhered to:

1. The images are captured with the express permission of: a) the relevant player(s); or
b) where the player is under 18 years old, the images are captured by the parent or legal guardian of the player or with the express permission of the parent, legal guardian or team captain (having obtained the parent/ legal guardian's permission) of the relevant player(s); and
2. The player, parent or coach has notified the session organiser, Competition Director and/or Referee of a Wiltshire Tennis Competition as relevant before the start of the activity by signing the Photography Registration Sheet provided by the organisers, and has obtained the relevant permissions.
3. Images should not be captured using photographic equipment with lenses of more than 300mm when extended.

End of section D.

Section E: Photography by official media outlets.

Official media outlets (such as local newspapers, on-line journals, regional TV etc.) may be invited by Wiltshire Tennis to take photographs of an event, activity or competition.

Their photographer should be easily identifiable, and:

1. The images may only be captured with the express permission of:
 - a) the relevant player(s); or
 - b) where the player is under 18 years old, the images are captured by the parent or legal guardian of the player or with the express permission of the parent, legal guardian or team captain (having obtained the parent/ legal guardian's permission) of the relevant player(s); and
2. The photographer must sign the Photography Registration Sheet, provided by the organisers, and have obtained the relevant permissions.
3. Photographers who do not provide evidence of a valid (within the past 3 years) DBS check must be accompanied at all times by a representative of Wiltshire Tennis who has both valid DBS and current safeguarding training.

End of Section E.

Section F:

Private arrangements between players and commercial photographers or videographers

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 must inform the photographer/videographer that they should be notifying the Competition Director/event/activity organiser of their attendance at the competition.

Individuals must not hold themselves out to be a party to such an arrangement unless the player or (where a player is under 18 years of age) their parent/guardian can demonstrate that such an arrangement exists.

Both the player (or parent/guardian) and the photographer/videographer must sign the Photography Registration Form provided by the organisers.

End of Section F.

Wiltshire Tennis Photography and Filming Policy Appendices 1 - 5

Appendix 1 - IMAGE AND VIDEO CONTENT.

N.B. Photography in changing rooms or similar, including first aid and toilet areas is expressly forbidden.

Images of individuals in a state of undress, such as whilst they are changing before or after a match, should not be captured or shared in any circumstance.

All individuals featured in photographs or film captured must be:

- appropriately dressed with clothing covering their torso from their neck to their thighs (for example a T-shirt and shorts or skirt);
- featured with people engaging in tennis;
- in groups with other children or adults where possible; and
- representative of diversity across tennis regarding age, gender, ethnicity and disability.

Appendix 2 - COACHING VIDEOS.

Where players and parents/guardians have consented to this image capture, coaches may use video equipment as a legitimate coaching aid. Players, parents/guardians must be made aware that this is part of the coaching programme and that material will be stored securely and deleted or destroyed when requested or no longer needed.

Appendix 3 - PUBLICITY MATERIAL: online, in print and on social media.

Wiltshire Tennis will obtain consent from individuals or their parent/guardian in advance, and will avoid using the full name of the individual featured or any other detailed information.

N.B. Publicity material may be retained by Wiltshire Tennis, securely stored, for archive purposes.

Our governing body, the LTA, reserves the right to ask for photographs or film to be deleted and/or removed from internet sites or social media platforms.

Appendix 4 - DATA PROTECTION.

Under applicable data protection legislation, including the General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 2018, individuals have a right to object to their images being processed. Depending on the circumstance, consent from the individual or their parent/guardian should be obtained before capturing, sharing or publishing images where an individual is identifiable. Whilst it is not always possible to avoid a specific image being captured, where an individual does object to their image being captured, attempts should be made to avoid photographing that individual and images of them should be deleted on request. In addition, as with all personal data, images and footage should be processed in accordance with the applicable data protection principles, other relevant legislation and guidance.

Appendix 5 – CONTACT US. If you have any questions regarding this policy and associated guidelines, please contact

safeguarding@wiltshiretennis.org.uk or competitionsupport@lta.org.uk

End of Wiltshire Tennis Photography and Filming Policy document.