RUSHALL VILLAGE FOOTBALL CLUB CIC
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Affiliated to Staffordshire Football Association

PHOTOGRAPHY AND THE USES OF IMAGERY POLICY

Implementation date	5th October 2023
First reviewed	13th April 2026
Agreed by	Mark Adams
Next review date	13th April 2027

General Principles concerning the use of Photographs or Recorded Images

Implicit within the Club policies and procedures for the protection of Children is the commitment to ensure that all publications and media represent participants appropriately and with due respect. It is not the intention of the Club to prevent parents from taking pictures of their children, but rather to ensure that photographic practices are carefully managed and effective prevention measures in place to deter anyone with undesirable intentions from taking and publishing inappropriate images.

Here at Rushall Village our parents, carers, children and the Club generally look forward to celebrating and or publicising footballing successes by photographing children at matches and events. Documenting a child's involvement and progress through the season both by film and photos is widely accepted as contributing to the enjoyment of the game.

It's also recognised some coaches find it helpful to use photographs or film as a coaching tool to support a player's development.

It is recognised that the use of photos and film on websites, social media, posters, within the press or other publications, can pose direct and indirect risks to children if they are not managed appropriately.

However, the taking of appropriate images of children is supported by Rushall Village. Everyone wishing to film or take photos in football has a responsibility to familiarise themselves with and adhere to the following guidance.

Potential Risks:

Inappropriate taking and or use of images of children

Someone may set out to take inappropriate photos or film content in ways that are potentially illegal and harmful, such as:

- Children changing.
- Photos taken in the toilet.
- Using a camera at ground level to photograph up girls' skirts.
- Images that appear ambiguous can be used inappropriately and out of context by others.
- Images that can easily be copied and edited, perhaps to create child-abuse images.
- Images shared privately online that can be re-shared, possibly entering the public domain on websites or social media

(further information on this is available in 'Section 6: Safeguarding in the Digital World' of the safeguarding section on TheFA.com)

The Identification of, contact with, or grooming of a child

When a child's image is accompanied by significant personal information e.g. full name, address - it makes them more easily identifiable to third parties. This can lead, and has led, to children being located, contacted and/or 'groomed'. Even if personal details are kept confidential, details identifying the school or club, or their favourite sportsperson or team, can potentially be used to groom the child.

There's an increased risk of identification of, and contact with a child:

- By someone in circumstances where there are legal restrictions – such as if the child is in local-authority care or placed with an adoptive family.
- Where restrictions on contact with one parent following a parental separation exist e.g. in domestic violence cases.
- In situations where a child may be a witness in criminal proceedings.

Commissioning Official or professional photographers and the local media

If you are commissioning professional photographers or inviting the media to cover a football activity, ensure you and they are clear about each other's expectations. The key is to plan ahead and communicate early on.

Please follow the steps below:

- Provide a clear brief about what is considered appropriate in terms of content and behaviour
- Inform them of your club's commitment to safeguarding children.
- Establish who will hold the recorded images and for how long they'll be retained and/or used and what they intend to do with them, e.g. place on a website for sale, distribute thumb nails to the club to co-ordinate sales.
- Issue the professional photographer with identification, which must be worn at all times.
- Clarify areas where all photography is prohibited e.g. toilets, changing areas, first-aid areas etc.
- Inform the photographer about how to identify – and avoid taking images of – children without the required parental consent for photography.
- Don't allow unsupervised access to children or one-to-one photo sessions at events.
- Don't allow photo sessions away from the event – for instance, at a young person's home.
- Inform participants and parents or carers prior to the event that a professional photographer will be in attendance.

What to do when parental consent is not given

The Club / event organiser has a responsibility to put in place arrangements to ensure that any official or professional photographers can identify (or be informed about) which children should not be subject to close-up photography. This could involve providing some type of recognisable badge, sticker or wristband, and/or a system for photographers to check with the activity organiser and/or team manager to ensure its clear which groups or individuals should not feature in images.

It is good practise for Parents / Carers / Guardian of children who are not to be photographed to remind the team coach of this, especially if the Team are playing at tournaments where there is likely to be many Teams in attendance.

REMEMBER

- It's not an offence to take appropriate photographs in a public place even if asked not to do so.
- No-one has the right to decide who can and cannot take images on public land.
- If you have serious concerns about a possible child protection issue relating to the recording of images then call the Police. This action should only be taken where you believe that someone may be acting unlawfully or putting a child at risk.
- The land or facility owner can decide whether photography and or filming at football activities will be permitted when carried out on private land. However, you need to make this known before allowing individuals access to the private property. If they do not comply then you may request, they leave.
- Try not to use images that include individuals wearing jewellery (as wearing jewellery whilst playing is contrary to the Laws of the Game as well as being a health and safety issue).
- That swimming as a social activity for football clubs presents a higher risk for potential misuse than football, so images should: – Focus on the activity rather than a particular child; – Avoid showing the full face and body of a child – instead show children in the water, or from the waist or shoulders up; – Avoid images and camera angles that may be more prone to misinterpretation or misuse than others.

Filming as a coaching aid

The FA advises that coaches using filming as a legitimate coaching aid should make parents/carers and players aware that this will be part of the coaching programme. Care should be taken when storing the film clips. Parental consent must of course have been given.

General Images of events
At many events, organisers will wish to take wide-angle, more general images of the event, the site, opening and closing ceremonies, and so on. It's usually not reasonable, practical, or proportionate to secure consent for every participating child in order to take such images, or to preclude such photography on the basis of the concerns of a small number of parents. In these circumstances, organisers should make clear to all participants and parents that these kinds of images will be taken, and for what purposes.

Good practise would be to ensure that any advertising, tickets or social media promoting an event state that general photography may be used.

Secure storage of images
Images or film recordings of children must be kept securely.

- Hard copies of images should be kept in a locked drawer.
- Electronic images should be in a protected folder with restricted access.
- Images should not be stored on unencrypted portable equipment such as laptops, memory sticks or mobile phones.

Misuse and manipulation of images
An individual with bad intent may deliberately target a vulnerable child to take images which may be uploaded to social media or shared with other likeminded individuals or groups motivated by sexual interest. Occasionally, these images are also used to threaten and force the child into unwanted, illegal sexual activity. Taking and sharing images like this may form part of wider bullying of the targeted young person by other young people, motivated more by a wish to cause humiliation and embarrassment. Even in the context of a shared joke among friends, without abusive intent, a young person taking and sharing inappropriate images may be committing a serious offence and risk criminal prosecution.

Responding to Concerns
Whether it's general club activities or when attending an event all club officials, volunteers, children and parents/carers should be informed that if they have any concerns regarding inappropriate or intrusive photography (in terms of the way, by whom, or where photography is being undertaken), these should be reported.

Reports can be made to the:

- Event organiser or another official.
- Club Welfare Officer.
- County FA Designated Safeguarding Officer.
- National League DSO
- The FA Safeguarding Team via safeguarding@TheFA.com

To report potentially unlawful materials on the internet please contact: The Internet Watch Foundation E: report@iwf.org.uk T: 01223 237700
W: iwf.org.uk

Useful Contacts:

Club Welfare Officer
Kirsty Bradburn
welfare@rvfc.co.uk

County FA Designated Safeguarding Officer:

Vicky Collins
support@staffordshirefa.com

01785256994

If you are concerned about the inappropriate use of images, please report this to the Club Welfare Officer by using the Welfare Incident Form on the website or the FA Designated Safeguarding Officer or to The FA Safeguarding Team via Safeguarding@TheFA.com.