

## **PHOTOGRAPHY AND FILMING POLICY**

### **PURPOSE AND SCOPE**

Essex 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 Essex 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 Essex 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 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
- photos/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 it's been posted. Platforms may then license images 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 or carers before taking and using a child's image
- 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

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- if consent is withdrawn, taking 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 publishing personal information about children
- making sure children, their parents and 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 more prone to misinterpretation or misuse than others.
  - 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 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

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 will notify the venue (including the Competition Director) of their attendance in advance.

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### USING OFFICIAL OR PROFESSIONAL PHOTOGRAPHERS

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

- follow a safe recruitment process/policy
- 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 an event and share the 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 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, 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.

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### STORING IMAGES

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 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 our Essex Tennis policies and procedures, including:

- Anti-Bullying
- Code of conduct
- Diversity and inclusion
- Online safety and communication
- Safeguarding policy
- Safe recruitment

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

Chair: **Alan Rayner**

Date:01/05/2023

County Safeguarding Officers:

**Joanne White**  
**Mike Jones**

Date 01/05/2023

## **PHOTOGRAPHY AND FILMING POLICY**

### **LTA PHOTOGRAPHY AND FILMING POLICY**

The Lawn Tennis Association Limited (the **LTA**) strives to ensure that all children, young people and adults at risk are safeguarded from abuse and have an enjoyable tennis experience.

This document sets out the policy of the LTA for the capture and use of photographic, video or other images at the tennis competitions and tournaments run by the LTA (LTA Staged). For the avoidance of doubt, these guidelines also apply to live broadcasts on social media or other platforms.

The LTA is keen to promote positive images of individuals playing tennis and is not preventing the use of photographic or videoing equipment. However, please be aware that some people may use sporting events as an opportunity to take inappropriate photographs or film footage.

In addition, this document sets out some guidelines for other tennis venues and organisations running tennis competitions on behalf of the LTA (LTA Approved).

#### **LTA STAGED COMPETITIONS**

LTA Staged Competitions refers to all tennis competitions and tournaments that are organised and delivered by the LTA (excluding the Fever-Tree Championships, the Nature Valley Classic, the Nature Valley Open, the Nature Valley International and the series of events known as the Trophy Series). Examples of LTA Staged Competitions include:

- LTA Junior Internationals
- LTA Pro Series
- LTA National Junior Championships
- LTA National League Finals
- Winter Regional Tour
- Quorn Family Tennis Cup Festival Days
- County Cup

Official photography and filming at all LTA Staged Competitions may only be carried out by an LTA approved photographer or videographer who should be clearly identifiable. The LTA advises that individuals are informed in advance where official photography and filming will be taking place (usually via the Online Tournament Entry Terms and Conditions). Consent may be required in accordance with the data protection provisions detailed on page 3.

No other professional photography or filming shall be permitted onsite at LTA Staged Competitions, except in the following circumstances:

- 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 or legal guardian of the relevant player(s); and

## PHOTOGRAPHY AND FILMING POLICY

- 2) the photographer or videographer has notified the Tournament Director and/or ITF Supervisor/Referee of the LTA Staged Competition before the start of the match, and has obtained the relevant permissions (from parent or legal guardians if under 18).

For the avoidance of doubt the following is not permitted onsite at LTA Staged Competition:

- Photographic equipment with lenses of more than 300mm when extended is not permitted other than for use by LTA approved photographers or videographers.
- The capture of images for commercial gain in any circumstances.

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

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.

Where any player, their parent or a coach requests to film their match 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 Tournament Director and/or Referee of the LTA Approved Competition before the start of the match, and has obtained the relevant permissions

### LTA APPROVED COMPETITIONS

For all other tennis competitions that are not LTA Staged Competitions, known as LTA Approved Competitions, the LTA recommends that tennis venues and organisations that are holding tennis competitions only permit the following groups of people to capture images of the players:

- Official media outlets (such as local newspapers) who should be easily identifiable and follow the requirements of this policy.
- A designated member of the event team taking pictures such as the prize giving photos who should be easily identifiable.
- Images captured by a parent/legal guardian or close family member for personal use, however this should not be with photographic equipment with lenses of more than 300mm when extended.

The LTA advises that individuals are informed in advance where official photography and filming will be taking place (usually via the Online Tournament Entry Terms and Conditions) and that consent is obtained from that individual or their parent/guardian to the capture and publication of such images in accordance with the data protection requirements outlined on page 3.

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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 the LTA recommends that tennis venues and organisations make any such photographer/videographer aware that they should be notifying the Competition Director of their attendance at the competition.

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.

The LTA advises that if a competition or tournament wishes to have an official competition photographer they must follow the safe recruitment process which is available on the LTA Website. The LTA advises that the photographer should not be seen as having an official association with the competition unless you have followed a safe recruitment process. For example you should not provide a photographer with a desk in your competition office / clubhouse unless you have followed a safe recruitment process.

The LTA recommends that the venue provides a sign informing players/spectators if an official competition photographer is present.

Where any player, their parent or a coach requests to film their match 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 Tournament Director and/or Referee of the LTA Approved Competition before the start of the match, and has obtained the relevant permissions

### IMAGE AND VIDEO CONTENT

All individuals featured in photographs or film captured must be:

- Appropriately dressed with clothing covering their torso from their neck to their thighs (e.g. a t-shirt and shorts or skirt). 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;
- Featured with people engaging in tennis;
- In groups with other children or adults where possible; and
- Representative of diversity across tennis with regard to age, gender, ethnicity and disability.

When publishing images in publicity material, online, in print and/or on social media the LTA advises thought to be given to the selection of images used. It is advisable not to use the full name of an individual featured or any other additional detailed information, and consent from that individual or their parent/guardian should be obtained in advance.



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

There is no intention to prevent coaches using video equipment as a legitimate coaching aid, however, players and parents/guardians should consent to this image capture and 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.

### 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.

### CONTACT

If you have any questions on these guidelines or their implementation, please contact [competitionsupport@lta.org.uk](mailto:competitionsupport@lta.org.uk).