

CPSU factsheets: Photography

1. Using photographs and videos of children and young people in sport for publication, promotion, or the press

This guidance is for anyone with responsibility for developing policies and procedures about the use and publication of official photography (including videos) of children involved in sports activities or events.

Sports organisations and clubs benefit from using images of young participants to promote and celebrate activities, events and competitions. Parents and children generally welcome opportunities to celebrate or publicise their achievements.

However, the use of photos and videos on websites and social media, and in posters, the press or other publications, can pose direct and indirect risks to children and young people if not managed correctly.

Organisations wishing to use or permit the use of images of children involved in their activities must therefore have a policy in place to safeguard them.

What are the risks?

Children may be identified, located, groomed¹ or contacted

Including the child's personal identity (full name, address) can make them identifiable and therefore vulnerable to individuals looking to locate, contact and 'groom' children for abuse.

Even if these details are kept confidential, any other details accompanying the images (such as the sports organisation, school or club they belong to, or their favourite sports person or team) can also be used to groom the child.

This also increases the risk of identification of, and contact with, a child by someone in circumstances where there are legal restrictions or this could otherwise be potentially harmful. For example if the child is in Local Authority care or placed in an adoptive family; or where it is potentially dangerous to reveal the child's whereabouts to an estranged parent due to previous concerns about domestic violence.

Taking or producing inappropriate or illegal images of children

Photo or video content may themselves be inappropriate (for example images of children changing); or images may be used inappropriately, or out of context. Images can easily be

¹ The term "grooming" refers to the process of a potential abuser using their knowledge of and/or relationship with a child to manipulate the child (and often adults around them) in order to create opportunities for sexually abusive behaviour.

copied and adapted, perhaps to create child abuse images, which can then find their way into the public domain on websites or social media.

Potential impact on children affected

The effects on children and young people of grooming or sexually abusive experiences can be devastating and life changing. Young people who have experienced online grooming or whose images have been mis-used and/or shared through social media often find this as traumatic and damaging as other, more direct, forms of sexual abuse.

There have been instances where identification of children through images and information appearing in public media have resulted in the breakdown of children's foster or adoptive family placements due to the intervention of adults who have subsequently traced them. Some children have also been put at risk when identified and traced by adults (known to them or not) with bad intent.

How can the risks be minimised?

- Think carefully before using any images showing children and young people on your website, social media, or in your publications.
- Establish the type of images that present the activity in a positive light, and promote the best aspects of the sport and organisation.
- Avoid supplying the full name(s) of the child or children along with the image(s), unless this is considered necessary, is in the child's best interests, and the child and parent have consented.
- Only use images of children in suitable dress/kit, including recommended safety wear such as shin pads or gum shields.
- There are many activities children can be involved in but clearly, activities such as swimming, gymnastics and athletics present a higher risk for potential misuse than others. Where possible images of these activities should:
 - focus on the activity rather than a particular child
 - avoid showing the full face and body of a child, for example show children either in the water, or from the waist or shoulders up
 - avoid images and camera angles that may be more prone to mis-interpretation or mis-use than others.
- Consider using models or illustrations if you are promoting an activity, rather than the children who are actually involved in it.
- Link to guidance on talented young athletes and open, public sites (below)

What to do when using official/professional photographers

- Ensure that children and parents are aware that a photographer will be active at the event, and consent has been obtained.
- Check the photographer's identity, the validity of their role, and the purpose/use of the images to be taken.
- Issue the photographer with identification, which must be worn at all times.
- Provide the photographer with a clear brief about what is considered appropriate in terms of image content and their behaviour (as above)*.
- Clarify areas where all photography is prohibited (toilets, changing areas, and so on)
- Inform the photographer about how to identify and avoid taking images of children without the required parental photography consent (this will depend on the process in place at each event)*.
- Do not allow unsupervised access to children or one-to-one photo sessions at events*.
- Do not allow photo sessions away from the event, for instance at a young person's home*.
- Clarify issues about ownership of and access to all images, and for how long they will be retained and/or used

*(establish/clarify during commissioning/contracting process).

Do I need parental permission?

Close up images

Organisers should seek parents' consent to take and use images of individual or smaller groups of participants in which their child would easily be recognisable.

Parents should understand how, where and in what context an image may be used (for example on a public website, through social media, or in a printed resource).

They should be aware of and support your policy on using children's images, and of the way these represent the organisation or activity.

This can be recorded on a parental consent form for use of images of children, possibly as part of the process for registering and consenting the child's participation in the activity/event.

You should also ask for the child's permission to use their image. This ensures that they are aware of the way the image is to be used to represent the activity. A children's permission form is one way of recording their consent.

Examples of consent forms are available on the [Child Protection in Sport Unit](#) website.

When using a photographer (even if this is undertaken by someone already involved in the club or activity) inform parents and children that a photographer will be in attendance and ensure they consent to both the taking and publication of films or photos.

General (eg wide angle) images of events

At many events organisers will quite reasonably wish to take wide angle, more general, images of the event, site/s, opening and closing ceremonies, and so on. It is usually not reasonable, practical or proportionate to secure consents 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 (before and during the event) make clear to all participants and parents that these kinds of images will be taken, and for what purposes.

Talented young athletes

As young athletes progress up the competitive ladder within their sport, elite level events are increasingly likely to take place in a public arena. Event organisers and sports governing bodies will quite reasonably seek publicity to positively promote their sport, and elite young athletes receiving endorsements or sponsorship may well welcome positive media coverage on a local, regional or national level.

In this case some aspects of the guidance around the use of images detailed above (for example avoiding the inclusion of names and some other personal details alongside photographs) are neither practical nor desirable. Organisers retain their duty of care to these athletes and a responsibility to safeguard them, and must ensure that parents and young athletes understand and consent to images being taken and information used in these circumstances.

It is important that other practice guidance (for example about the nature, content and use of images; and about ensuring that photography sessions are supervised) are still considered and applied. It is important for the athletes, their parents and media representatives to be clear about appropriate arrangements and ground rules for interviews, filming and photo sessions.

Young elite athletes and their parents should be supported by the sports organisation and prepared to manage these and a range of other issues (including safeguarding concerns) that may arise as a result of their sporting success and increased public profile.

Many sports governing bodies already provide information, guidance and support to help athletes manage the media, for example in planning for media interviews.

When parental consent is not given

Organisers have a responsibility to put in place arrangements to ensure that any official/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 wrist band (perhaps a different colour to 'consented' young people – ideally something easily recognisable but not stigmatising for the child), and/or a system for photographers to check with the activity organiser and/or team manager to clarify which groups or individuals should not feature in images. It must be emphasised to any photographer that the use of images with these 'unconsented' children

included will not be permitted.

How should I respond to concerns?

All staff, volunteers, children and parents 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 to the event organiser or another official.

There must be an appropriate safeguarding policy and procedure in place to ensure that any reported concerns are dealt with in the same way as any other child protection issue, ensuring that your club/event or lead child protection or safeguarding officer is informed. If there are concerns or suspicions about potentially criminal behaviour this should include referral to the police.

Concerns about professional photographers should also be reported to their employers.

2. Photography by parents/spectators at events

A significant proportion of spectators (especially competitors' family and friends) will want to (and will) take photos or videos at sports events.

This guidance is for anyone with responsibility for organising or safeguarding children involved in sports activities or events at which spectators, parents or other members of the public may wish to take photographs or videos.

The publication of photos and videos on websites and social media can pose direct and indirect risks to children and young people.

Organisations responsible for sports and activity events must have a policy and procedures in place to safeguard the children involved.

What are the risks?

Taking or producing inappropriate or illegal images of children

Primarily there is a risk that images of children may be inappropriate in content or style. Some individuals deliberately target sports activities and set out to take inappropriate photos (for example of children changing, in the toilet, or by using cameras at ground level to photograph up girls' skirts) in ways that are potentially illegal and harmful.

In other cases images may be inappropriate in that they appear ambiguous and can easily be used inappropriately and out of context by others (for example images from some angles of gymnasts doing the splits).

Images can easily be copied and adapted, perhaps to create child abuse images, which can then find their way into the public domain on websites or social media.

Children may be identified, located, groomed^{2*} or contacted

Including personal details about a child (full name, address), for example on social media, can make them identifiable and therefore vulnerable to individuals looking to locate, contact and 'groom' children for abuse.

Even if these details are kept confidential, other details accompanying the images (such as the sports organisation, school or club they belong to, or their favourite sports person or team) can also be used to groom the child.

This also increases the risk of identification of, and contact with, a child by someone in

² The term "grooming" refers to the process of a potential abuser using their knowledge of and/or relationship with a child to manipulate the child (and often adults around them) in order to create opportunities for sexually abusive behaviour.

circumstances where this is illegal or otherwise potentially harmful. For example if the child is in Local Authority care or an adoptive family; or where it is potentially dangerous to reveal the child's whereabouts to an estranged parent due to previous concerns about domestic violence.

Potential impact on children affected

The effects on children and young people of grooming or sexually abusive experiences can be devastating and life changing. Young people who have experienced online grooming or whose images have been mis-used and/or shared through social media often find this as traumatic and damaging as other, more direct, forms of sexual abuse.

There have been instances where identification of children through images and information appearing in public media have resulted in the breakdown of children's foster or adoptive family placements due to the intervention of adults who have subsequently traced them. Some children have also been put at risk when identified and traced by adults (known to them or not) with bad intent.

How can these risks be minimised?

- Clarify and promote the photography 'rules' for the event to all staff, volunteers, spectators, parents and young participants.
- These may range from:
 - a total ban on any photography
 - arrangements to register individuals intending to take photos
 - no overall event public photography ban
- Parents and spectators should be warned that there can be negative consequences to sharing images linked to information about their own or other people's children. Care should be taken about 'tagging' pictured children on social media, including Facebook or Twitter.
- Establish procedures to respond to and manage any concerns arising, including clear reporting structures and a system to contact police when necessary.

Do I need parental permission for photography by spectators/parents?

Parental consents are not required for this form of photography, although event organisers should make the policy regarding photography by the public clear to all participants and parents ahead of the event.

Different approaches to photography by spectators/parents at events:

1. Banning photography by spectators/parents

With the widespread use of smart phones, tablets and other equipment with which photos can be taken, there are significant challenges in seeking to impose and operate an outright ban on photography by parents, spectators and the public.

Clear communication to all parties is key to this approach, together with well-publicised systems for anyone to raise concern about breaches of these rules.

Advantages/challenges

Many operators of closed facilities (for example some swimming pools) prohibit any unauthorised photography, while others may impose bans in specific areas within the facility. Event organisers need to establish, comply with and promote any venue policies or procedures, regardless of their own.

A total ban may make policing the rules more straightforward (although the use of phones may remain an issue), and provides a clear message from organisers about their commitment to safeguarding.

However a ban can be difficult to enforce, given the number of devices with which images can be taken. It is often very unpopular with parents and other spectators who wish to record the efforts and achievements of their children or friends.

Individuals may be less inclined to take photographs in circumstances where arrangements are made for them to access images taken by official photographers after the event.

2. Registering spectators/parents wishing to take photos

Many event organisers require anyone wishing to take photographs to register, usually through a basic form explaining their reason for wanting to take photographs i.e. parents/carers.

Communicating this to the public is essential, together with establishing a straightforward process for doing so (including registration point/s, registration forms, issuing a sticker to signify a registered person/camera/phone).

Staff, volunteers, participants, parents, spectators and the public need to be informed about both this process and encouraged to report anyone apparently taking photos without the necessary registration.

Advantages/challenges

This system has the advantage of providing a clear message about the organisers' commitment to safeguarding, potentially deterring individuals with bad intent, and may provide identifying information about someone should concerns arise (depending on the thoroughness of any identity checking included within the registration process). It also enables events officials to justifiably approach an individual who has not registered and remind them of the requirement to do so.

When well-advertised it effectively enlists many spectators in 'policing' the rules.

However registration itself clearly requires resources and time (including for spectators) and unless it is linked to some form of robust identify check will not provide a mechanism to identify individuals should concerns subsequently arise.

3. No outright event spectator/parents photography ban

Some organisations have opted not to seek to ban all photography. Instead they proactively promote guidance to all spectators/public about those specific areas where photography is not permitted under any circumstances (for example toilets and changing areas). The public should

also be provided with key messages about the risks associated with online postings, and encouraged to report any concerns they may have about anyone's behaviour in this context.

Advantages/challenges

This approach has the advantage of not requiring any registration system (other than for official/professional photographers attending the event). It focuses more on the concerning aspects of photography being undertaken, rather than photography itself. It acknowledges that many spectators will wish to take photographs, while also promoting safeguarding messages (eg through event programmes, signage or tannoy announcements).

This system relies on a high level of public awareness of what behaviours should raise concerns, and of the event's process for reporting and responding to reported concerns. It provides no process to secure identity details of any spectators.

How should I respond to concerns?

All staff, volunteers, children and parents 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 to the event organiser or another official.

There must be an appropriate safeguarding policy and procedure in place to ensure that any reported concerns are dealt with in the same way as any other child protection issue, ensuring that your club/event or lead child protection or safeguarding officer is informed. If there are concerns or suspicions about potentially criminal behaviour this should include referral to the police.

How can messages about event photography be publicised?

Event organisers need to embed and address this issue in their planning process (including understanding the implications of any facility/venue policies and procedures).

There is a range of ways event organisers can inform various stakeholders about their photography policies and procedures, including:

- Pre-event registration/consent/information forms, packs and leaflets for all event staff and volunteers, participants and parents
- Pre-event induction/training for staff and volunteers
- Event programmes
- Posters and signage around the venue/s
- Public address announcements during the event.

Photography by the wider public in open event sites

Can event organisers ban members of the public taking photos of their events in public areas?

In general members of the public are entitled to take photos in public areas, whether or not this includes taking images of children involved in sports events or activities. Regardless of any

policies or procedures governing photography by those involved in or watching sports events, organisers have no right to impose these rules on other members of the public accessing or using the same public spaces.

However, if there are any indications or concerns that an individual may be taking images of children/young people that are inappropriate or illegal, this should immediately be reported to the organisers who have responsibility for contacting the police. This could include images of children taken in changing areas or toilets; or being taken in ways or from angles that suggest inappropriate or abusive intent – for instance when a camera or other device is operated at ground level pointing up girls' skirts.

Organisers should have in place and actively promote clear ways for anyone to report concerns they have about photography or any other aspect of children's wellbeing.

3. Photography in changing rooms/showers

There are a growing number of reported incidents involving inappropriate or illegal photography of children in changing and shower areas of many sports and leisure facilities.

Risks

Some incidents clearly involve an individual (adult or another young person) with bad intent deliberately targeting a vulnerable child to take and misuse images. Such images may be uploaded to social media or otherwise 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.

In other circumstances images may be taken by a young person's friends or acquaintances, and perhaps uploaded onto social media, in the context of a joke rather than with deliberate abusive intent. It is important to be aware that even in these circumstances the young person doing so may be committing a serious offence and risks criminal prosecution. [LINK TO SEXTING information etc \(through NSPCC site?\)](#)

Facilities' responses

As a result of concerns arising many facility operators have put in place policies and procedures to reduce the likelihood of such incidents taking place. These almost always include imposing a ban on photography of any form in these particular areas of the facility (regardless of rules that may apply in other areas). Such bans cover participants, spectators, all staff and volunteers.

It can be difficult to be sure whether someone using a mobile phone is actually taking photos or videoing their environment. In order to further deter photography in changing and shower areas some operators have banned the use of mobile phones or other equipment capable of taking images altogether from these areas.

It is important that all customers, other users, staff and volunteers within the facility are aware of the operator's stance on photography. This can be communicated in a number of ways, most often through clear signage and posters.

Everyone should be made aware of what they should do if they have concerns about the behaviour of any other person in this context. If anyone is suspected of taking images of children (or adults) in a state of undress the facility manager or safeguarding lead should be informed immediately and the police consulted.

