

MERLEY FOOTBALL CLUB

PHOTOGRAPHY AND FILMING POLICY

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PHOTOGRAPHY AND FILMING POLICY

Merley Football Club uses the FA guidance on photographing & filming children for its policy. The taking of appropriate images of children is supported by the FA. It is 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. However, 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 and these are detailed in the FA guidance notes below.

Through its registration system and within the Merley Football Club membership registration form, the club will obtain parental support that appropriate photographs of their children can be taken & also the club will identify those children subject to care orders who must not be photographed. Managers will be made aware of these children.

FA Guidance on Photographing and Filming Children:

Parents, children and football clubs 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. The FA recognises 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 the FA. 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 illegal and harmful, such as:

- Children changing
- Photos taken in the toilets
- 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 your expectations. The key is to plan ahead and communicate early on. 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

PHOTOGRAPHY AND FILMING POLICY

- 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:**

Clubs and organisers have a responsibility to put in place arrangements to ensure that any official photographers can identify (or be informed about) which children should not be subject to closeup 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.

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 (see further guidance below. 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.

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
- Event Designated Safeguarding Officer
- Club Welfare Officer
- County FA Designated Safeguarding Officers
- The FA Safeguarding Team via safeguarding@TheFA.com

Please refer to the Merley Football Club Safeguarding Children Policy for more information and contact details.

PHOTOGRAPHY AND FILMING POLICY

Do:

1. Share The FA's guidance on taking images with everyone who becomes a club member (officials, parents/carers).
2. Ensure the club has written parental consent to use a player's image in the public domain e.g. on the club website, Facebook page or in a newspaper article. This is essential in relation to point 3 below.
3. Ensure that any child in your club who is under care proceedings where there are legal restrictions, is protected by ensuring their image is not placed in the public domain. This can be done by using The FA's Club Annual Membership Information and Consent Form with information received via Merley Cobham Sports Youth FC membership registration form.
4. Ensure all those featured are appropriately dressed (a minimum of vest or shirt and shorts).
5. Aim to take pictures which represent the broad range of youngsters participating safely in football e.g. boys and girls, disabled people, ethnic minority communities.
6. Advise parents/carers and spectators that there can be negative consequences to sharing images linked to information about their own or other people's children on social media (Facebook, Twitter) – and that care should be taken about 'tagging'.
7. Establish procedures to respond to and manage any concerns, including clear reporting structures and a system to contact the Police when necessary.

Don't:

1. Publish photographs with the full name(s) of the individual(s) featured unless you have written consent to do so and you have informed the parents/ carers as to how the image will be used.
2. Use player profiles with pictures and detailed personal information online.
3. Use an image for something other than that which it was initially agreed, e.g. published in local press when initially produced for a clubhouse commemorative picture.
4. Allow images to be recorded in changing rooms, showers or toilets – this includes the use of mobile phones that record images.
5. Include any advertising relating to alcohol or gambling in photographs of children

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 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, facility owner and Merley Football Club can decide whether or not 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.