



The ArcOframe Stadium, Ruskin Drive Sports Village, St Helens, WA10 6RP

Photography and Video Policy

Everyone wishing to film or take photos in relation to activities involving Pilkington Football Club, whether as a parent, carer, spectator, club official, player or otherwise has a responsibility to familiarise themselves with and adhere to this Policy.

1. Celebrating activity

- 1.1 Pilkington Football Club, (the "Club") ("we", "our", "us") recognises that:
 - parents, carers, children and football clubs generally look forward to celebrating and/or publicising footballing successes by photographing individuals at matches and events;
 - documenting an individual's involvement and progress through the season both by film and photos is widely accepted as contributing to the enjoyment of the game; and
 - some coaches find it helpful to use photographs or film as a coaching tool to support a player's development.
- 1.2 For these reasons, the Club welcomes appropriate photographs and images that celebrate the sport, the values and objectives of the Club, and positive reflections of our Club's operations.

2. Potential risks

- 2.1 However, we also understand that photography and video imagery and its inappropriate use can present difficulties, risk and sensitivity in a range of circumstances.
- 2.2 Furthermore, there is evidence that some people have used sporting events as an opportunity to take inappropriate photographs or film footage of children, young persons and other adults at risk in potentially vulnerable positions. The Club utilises employees, volunteers and designated photographers to record activities and events within the Club and encourages each of them to be vigilant, with any concerns to be reported to the Club's board of directors and/or welfare officer.

- 2.3 The Club recognises that some people 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 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 reshared, possibly entering the public domain on websites or social media.
- 2.4 The Club also recognises that 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.
- 2.5 Additionally, the Club understands there is 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 localauthority 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.





We only do positive. BRESP

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3. Use of images by the Club

- 3.1 The Club will not take unauthorised images or video footage of children, young persons or adults at risk. In addition, the Club will never use or distribute images of children, young persons or adults at risk without their knowledge and prior written consent.
- 3.2 Photography and video footage includes the taking of still photographs, filmed and moving images and video recordings by whatever means.
- 3.3 Written parental/carer consent must be obtained before any children, young persons and other adults at risk partaking in Club events and activities are photographed, filmed or their image is captured using any device.
- 3.4 The exception to this, when written parental/carer consent will not apply, is when they enter solely as a spectator the Club's ground, at which time the terms and conditions of entry advise that by a parent/carer allowing them to enter the ground they thereby provide consent for their image to be captured/used by the Club.
- 3.5 During the course of our activities it is foreseeable that a child's, young person's or adult at risk's image may be captured by appointed photographers in digital photographs and in film. These images may then be used by the Club in both internal and external news and marketing publications and online via websites and social media. In any situations where they may be subject to 'incidental image capture' (i.e. they are in the background behind a main subject), where practical they will be informed that they may be on camera and have the opportunity to opt out.
- 3.6 Where a person finds that their image or that of their child, young person or adult at risk has been used in these circumstances and they do not wish it to be used then we will endeavour to remove it from circulation where it is practical to do so and where there are reasonable grounds to do so.
- 3.7 The Club will:
 - ensure that any child in the Club who is under care proceedings where there are legal restrictions, is protected by ensuring their image is not placed in the public domain;

- ensure that all those that are featured in photographs or video footage are appropriately dressed, i.e. wearing a minimum of vest or shirt and shorts;
- 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;
- establish procedures to respond to and manage any concerns, including clear reporting structures and a system to contact the Police when necessary; and
- endeavour 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).
- 3.8 The Club will not:
 - publish photographs with the full name(s) of the child(ren), young person(s) or adult(s) at risk featured without written consent to do so and having informed the parents/carers as to how the image will be used;
 - use profiles with pictures and detailed personal information online of players who are under 18 years;
 - use an image for something other than that which it was initially agreed, e.g. published in local press when initially produced for a commemorative picture;
 - allow images to be recorded in changing rooms, showers or toilets or where children, young persons and adults at risk are not fully clothed; – this includes the use of mobile phones that record images;
 - include any advertising relating to alcohol or gambling in photographs of children;
 - take images that are sexually suggestive or provocative.







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4. Photography by external photographers

Where the Club commissions professional photographers or invites the media to cover a football activity, we will endeavour to:

- ensure that we and they are clear about each other's expectations;
- provide a clear brief about what is considered appropriate in terms of content and behaviour;
- inform them of the Club's commitment to safeguarding children;
- establish who will hold the recorded images and for how long they will 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 to 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;
- prohibit unsupervised access to children or oneto-one photo sessions at events;
- prohibit 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.

5. Photography by Parents & Carers

5.1 The Club recognises that photography in football traditionally forms an enduring part of each family's record of their child's, young person's or adult at risk's progress, engagement and a celebration of success and achievement as well as being an established social practice.

- 5.2 Where practical, arrangements can be made to allow photographs to be taken by parents, carers and other guests attending Club events. Photography must not be allowed to upset the performance or smooth running of the event or affect the health and safety of players and others.
- 5.3 When a parent does not agree to their child being photographed, the Club will make every effort to comply sensitively. Parental photography must not include any child whose parent has refused consent for any reason. This may necessitate offering photography opportunities before or after the event of those who are authorised to be involved.
- 5.4 Parental photography is secondary to the main aims and purposes of performances and must not be allowed to interfere with the opportunities for player participation.

6. Filming as a coaching or management aid

- 6.1 The recording of training or match footage is a legitimate coaching aid and as such parents and players are made aware that this is part of the coaching programme.
- 6.2 Similarly photographs of matches or players for management purposes (e.g. ID passes or databases) are regularly taken.
- 6.3 Both these types may be covered by data protection law. All video tapes, still photographs and digital images are retained and stored in accordance with the Club's Data Protection Policy.

7. Data protection laws

Data protection legislation may apply to the photography of children, young persons or other adults at risk at Club activities. Where it applies and where practical, if images are captured by the Club, consent from the parent or carer should be obtained and the option to opt out will be available. If in any doubt, a picture should not be taken.







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8. Opt-out

- 8.1 Other than pursuant to clause 3.4 above, individuals have the right to opt-out (i.e. revoke or not give consent) of being photographed.
- 8.2 In such circumstances, the Club will endeavour to make suitable arrangements to apply any restrictions required whilst also minimising the disruption to normal Club activities.
- 8.3 These arrangements will be agreed in advance with those with parental responsibility for the player and must uphold the dignity of the participant opting out.

9. Storage

- 9.1 All images, whilst held by the Club, will be securely stored in accordance with the Club's Data Protection Policy and remain the property of the Club at all times.
- 9.2 Where footage is passed to players and parents for training and development purposes this must not be passed on further or published without the written permission of the Club.

