



ALBURY COMMUNITY SPORTS HUB POLICY AND GOOD PRACTICE FOR PHOTOGRAPHY AND FILMING

RISKS OF SHARING IMAGES ONLINE

Sharing photographs and images on social media or other online platforms carries potential risks. For example:

- people may become vulnerable to grooming if a photograph is shared alongside information that makes them identifiable. This includes: personal details – a tag with location information; visual details such as a school/club uniform
- inappropriate images of children may be shared online
- images may be copied, downloaded, screenshotted or shared by anyone
- images may be adapted and used inappropriately
- photos or videos may appear in internet search results
- depending on the terms and conditions of using an online platform, the image 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 photo or video, and any comments on them, become a part of a public image.

ACSH WILL KEEP ITS FACILITIES USERS SAFE BY:-

- always asking for written consent from an individual, a child and their parents or carers before taking and using a child's image
- if consent is withdrawn, taking reasonable steps to remove the photos of the from public view. It may not be possible to delete or destroy all images that have been posted online (such as via social media) or in hard copy.
- only using first names unless:
 - it is considered necessary – such as for elite /high profile facilities users
 - consent has been given (and been informed how, where, in what context an image might be used, e.g. public website, or through social media, and are aware of potential risks)
- never publishing personal information about individuals
- making sure adults, children and their parents and carers understand how images will be securely stored and for how long (including how we will control access to the images and their associated information)
- reducing the risk of images being copied and used inappropriately by:
 - only using images of individuals in appropriate clothing
 - avoiding images and camera angles that may be more prone to misinterpretation or misuse than others
 - avoiding full face and body shots of individuals taking part in activities where there may be a heightened risk of images being misused
- using images that positively reflect an individual's involvement in the activity

- only using ACSH recording 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
- reasonably spot checking personal devices to monitor compliance
- setting clear expectations around consent and the use of any personal devices amongst volunteers and young players

PHOTOGRAPHY AND/OR FILMING FOR PERSONAL USE

When children, parents/carers or spectators are taking photographs or filming at events and the images are for personal use, it is advisable to make known what will be allowed before the start of the event. ACSH will therefore take action by making an announcement or through printed medium and ensuring that every reasonable effort is made to inform photographers of the requirement for consent by the subject of any images.

USING OFFICIAL, PROFESSIONAL OR PRESS PHOTOGRAPHERS

If the Press or a professional photographer is engaged for an event, ACSH will provide the photographer with a clear brief about appropriate content and behaviour

- ensure the photographer wears identification at all times
- inform those attending that a photographer will be at the event and ensure they give written consent to images which feature close up images being taken and shared*
- inform the photographer about how to identify – and avoid taking images of anyone without the required consent
- clarify areas where all photography is prohibited (i.e. toilets, changing areas, first aid areas)
- not allow the photographer to have unsupervised access to children or any vulnerable person
- not allow the photographer to operate outside the event in the name of ACSH
- report any concerns regarding inappropriate or intrusive photography.

**At some events, wide-angle and general images 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 participant in order to take such images. In these circumstances, ACSH will make clear to all participants that these kinds of images will be taken, and for what purposes.*

If local Press, journalists or professional photographers (not hired by ACSH) wish to operate at an event and share the images professionally or in the wider world, ACSH will ensure they have given proper permission for this in advance and will ensure they are informed of:-

- the name and address of the person using the camera
- the names of anyone specific they wish to take images of (if possible)
- the reason for taking the images and/or what the images will be used for
- a signed declaration that the information provided is valid and that the images will only be used for the reasons given.

ACSH will ensure that they seek consent from the intended subjects of the images and their and inform the photographer of anyone who does not give consent.

CONCERNS

If ACSH becomes concerned that someone unknown to them is taking photography or filming without permission, they will ask them to leave and (depending on the nature of the concerns) follow safeguarding procedures. The Welfare Officer will be informed of the circumstance and consider whether Police involvement is necessary.

STORING IMAGES

ACSH will store photographs and videos taken at the Hub securely and in accordance with data protection law.

Hard copies of images will be kept in a locked drawer and electronic images in a protected folder with restricted access. Personal devices should be set so that images will not automatically upload to the cloud.

Images of children will never be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

Images will be deleted after use and not repurposed for personal use (e.g. marketing or otherwise);

When obtaining consent for capturing and storing images it should be stated how long images will be kept for.

If at the time consent was obtained there was no reference to storage, the images should be reviewed as to whether they are still required to be stored and that storage is necessary and legitimate.

Access to images should be controlled, i.e. through a password protected folder

Images should not be kept longer than consent was given for. If images are deemed to be no longer necessary, they should be deleted.

ACSH COMMITMENT TO THE ABOVE GOOD PRACTICE

The Board will ensure that the above guidance is followed and will act immediately on notice of any contravention or carelessness, responding to any whistle blowing or reporting which is brought to their attention, taking whatever action is necessary to improve security in all aspects of photography and/or filming.

Board approval - April 2023