

# Digital Photography & Image Policy

EXTERNAL



<b>Date of Last Review</b>	14 <sup>th</sup> November 2018
<b>Review Undertaken By</b>	A.Tunbridge - CEO
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Our Digital Photography & Image Policy provides all staff, players, participants & supporters, along with their parents & carers with details regarding how the Club manages and processes digital content.	
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## Overview

Stevenage Football Club takes seriously its responsibility to protect and promote the safety and welfare of young people under the age of 18. We recognise this responsibility extends to how we manage the use of still and video images of people under the age of 18 and have put in place appropriate measures.

Photography and videography in football is subject to General Data Protection Regulations (GDPR) regarding the rights of individuals to have information of a personal nature treated in an appropriate manner and the Human Rights Act 1998, protecting the privacy of individuals and families. Further details of how the Club processes its data can be found in its **Data Protection Policy**.

As well as these statutory rights, restrictions on photography arise from issues of safeguarding and copyright in performances. Stevenage Football Club recognises that it is difficult to balance the benefits of having photographic records of the wide variety of events that take place day to day in the club's environment, whilst also appropriately protecting the individuals associated with the club

## Club Use

From time to time we may wish to capture video or photographs of people who engage with our Club under the age of 18 years old.

These images or videos may be used on our website, in printed materials such as match day books, or even on the club's social media accounts, such as Twitter, Facebook and Instagram. There may also be times when our club is visited by members of the press or media who will take photographs or film footage. Players will often appear in these images which may appear in local or national newspapers or on televised news programmes.

Please note that websites can be viewed throughout the world and not just in the United Kingdom where UK law applies.

We inform all parents and carers of people aged under 18 years old when engaging with Stevenage Football Club that their images may be used in marketing and promotional material produced by Stevenage Football Club. Except for people aged under 18 years old attending a match within our stadium, parents and carers must sign a consent form relating to imagery for all other activities. Any parent or carer who do not wish for their images to be used in this capacity, for any reason, may opt out by informing the club in writing or emailing [info@stevenagefc.com](mailto:info@stevenagefc.com).

Where parents/carers have opted out, we take steps to ensure their child's image is not identifiable in any of our materials.

Stevenage Football Club will use reasonable judgement when using images for the progression of the club whilst always respecting the wishes of the individual and their parents.

## Use of Digital and Video Images

The development of digital imaging technologies has created significant benefits and allowing staff and players/participants/supporters instant use of images that they have recorded themselves or downloaded from the internet. However, staff and players/participants/supporters need to be aware of the risks associated with sharing images and with posting digital images on the internet. Those images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term.

Stevenage Football Club will inform and educate users about these risks and provides further guidance to its staff in its **IT, Social Media, Email & Internet Policy**. In addition, it will seek to:

- When using digital images, staff should inform and educate players/participants/supporters about the risks associated with the taking, use, sharing, publication and distribution of images. They should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- Staff are allowed to take digital / video images, using Stevenage Football Club equipment, to support educational aims, but must follow the club's policies concerning the sharing, distribution and publication of those images.
- Care should be taken when taking digital / video images that players are appropriately dressed and are not participating in activities that might bring the individuals or the Club into disrepute.
- Players/participants/supporters must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include players will be selected carefully and will comply with good practice guidance on the use of such images.
- Players/participants/supporters full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Stevenage Football Club will not use publicly or externally images of players/participants/supporters whose parents or carers have opted their children out.
- Stevenage Football Club staff must report any concerns relating to any inappropriate or intrusive photography to one of its Safeguarding Officers.
- Stevenage Football Club staff must not use any images that are likely to cause distress, upset or embarrassment.
- Photographs taken by staff during Club activities may be used within the Club to illustrate the work of the club except in cases where the parent/carer has opted their child out.
- Copyright and use of photographs are carefully controlled by and retained safely by the club
- Photographs held by the club must be annotated with the date on which they were taken and stored securely.
- Cameras and mobile phones are prohibited in the toilet areas.

## Photography by and of Club Staff

Photographs of staff members may be used by the Club for promotional materials. Staff members also have the right to opt out of these uses but must inform the HR Administrator.

## **Photographs by Other Authorised Agencies**

- The involvement of other agencies can only be authorised by the CEO. Other agencies may include:
- Reputable commercial photographers commissioned by the CEO. The law allows them to retain the copyright of photographs they take.
- The press and other media. Copyright rests with the photographer.

The purpose of the pictures must be explained to the parents or players/participants/supporters themselves and written permission must be sought. Players/participants/supporters must not be photographed for these purposes under any circumstances unless written permission has been obtained or they are in the crowd of a match at the Club's stadium which is covered by the stadium's **Ground Regulations**.

Parents should be made aware that, when team or group photographs are taken by a commercial agency, the photographer retains the copyright. They should be given contact details of the agency used.

## **Photography by Parents & Carers**

Photography in football traditionally forms an enduring part of each family's record of their child's progress, engagement and a celebration of success and achievement as well as being an established social practice. Where practical, arrangements can be made to allow photographs to be taken by parents 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.

When a parent does not agree to their child being photographed, a member of the senior management team must inform staff and 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.

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.

## **Peer Photography**

Players/participants/supporters will photograph each other extensively during certain activities especially during events, tours and tournaments. Staff should maintain the supervision and management control expected in their "duty of care" role, they must ensure they inform all players/participants/supporters of the expectations with regard to photographing their peers.

Players/participants/supporters should be educated about acceptable behaviour when photographing their peers. There may be incidents where players take inappropriate photographs, perhaps showing friends and other players inappropriately dressed. Staff must endeavour to discourage this practice, as it is open to abuse, but ultimately parents are responsible for monitoring their child's use of personal cameras and subsequent use of images involved

## **Implementation & Enforcement**

The Chief Executive, senior managers and line managers are responsible for the promotion and maintenance of this policy by their staff. The Chief Executive is responsible for monitoring and reviewing the operation of this policy.

Employees are expected to comply with all elements of this policy. Employees not complying with the Holiday Policy may be subject to the Club's Disciplinary Procedures as outlined in its **Disciplinary Policy**.