

PHOTOGRAPHY, FILMING AND SOCIAL MEDIA AND BROADCAST POLICY

Key Definitions – For the purposes of this policy, this Policy the following terms shall mean.

- “Surrey Cricket” encompasses *The Surrey County Cricket Club, Surrey Cricket Foundation and Kennington Oval Limited*
- the term ‘child’ applies to anyone under the age of 18 while the term ‘young people’ applies to anyone over the age of 14 but under the age of 18
- A ‘parent’ is a legal guardian or anyone who has caring responsibilities for children or young people
- ‘staff’ includes our coaches, team managers and all full and part time employees’ volunteers working on behalf of Surrey Cricket
- ECB stands for the England and Wales Cricket Board
- “Safe Hands” is the ECB’s policy for safeguarding children

Statement of Intent

The aim of this policy is to provide procedures and practical guidance for all Surrey Cricket employees, agents, volunteers, and other professionals and partners working alongside the Surrey Cricket to safeguard children and young people

Introduction

Surrey Cricket is keen to promote the use of positive images of children and young people playing cricket. It is not preventing the use of photographic or videoing equipment.

Some photographs are considered “personal data” under Data Protection”. Depending on the circumstance, consent from either the child, young person, and or both should be sought before capturing, sharing and or publishing images where a child can be identified, including posting for the Surrey Crickets website, for example. In addition, all the personal data that Surrey Cricket processes should be in accordance with **GDPR** principles and other relevant legislation and guidance.

Unfortunately, some people may use sporting events as an opportunity to take inappropriate photographs or film footage of children. All Staff should be vigilant about this. These individuals could attend our venues allowing people to presume they are related to a child involved. Any concerns during an event should be reported to the Surrey Cricket official or the designated event organiser, who should approach the individual concerned when possible.

It is also possible that if a picture and name was published in the media, Surrey Cricket website for example, this information could be used inappropriately. For this reason, the child’s or young person’s picture and name should not appear together.

There may be other reasons why individuals may not wish their child’s or young person’s photograph to be taken by someone they do not know personally, for example estranged parents looking to gain access to a child or young person, or families who have fled abusive situations. Surrey Cricket must always offer Parents/Carers the opportunity to withhold consent for photographs and filming of their child.

Surrey Cricket staff must in all circumstances obtain the Parents/Carers/Child's/adults written consent to use images: please use the attached consent form

Considerations to ensure everyone's safety

1. Photographs images should not be taken at matches or training without the prior permission of the parents/carers of the child/young person. This permission can be given by proxy by the coach of each team only after parental consent for this has been granted. Surrey Cricket Staff must arrange this prior to attending matches, training sessions and or events
2. A child, young person or adult considered at risk should be informed that a person will be taking photographs
3. The children/ or young person should be informed that if they have any concerns about photography, they can report these to the coach or team manager.
4. Concerns regarding inappropriate or intrusive photography should be reported to Surrey Crickets Safeguarding Officer and recorded in the same manner as any other child protection and or safeguarding concern
5. It is recommended that at Cricket tournaments/ festivals/ events/ competitions a camera registration book should be set up for Parents/Carers to complete.

Considerations about the use of images of children/young people (for example on the web, in the media)

- Ask for parental permission to use their child's/young person's image and wherever possible show the image to the parents and child/young person in advance. This ensures that they are aware of the way the image will be used to represent cricket and Surrey Cricket.
- Ask for the child's/young person's permission to use their image. This ensures that they are aware of the way the image will be used to represent cricket and the Club
- If the cricketer is named, avoid using their photograph.
- If the photograph is used, avoid naming the child/young person

Don't use player profiles with pictures and detailed personal information on websites

- Don't use an image for something other than that what it was initially intended for and agreed
- Don't allow images to be recorded in changing rooms, showers or toilets-this includes the use of mobile phones that record images.
- Focus on the activity rather than the individual
- Only use images of children in appropriate kit (training or competition), to reduce the risk of inappropriate use and to promote positive images of the children
- Encourage the reporting of inappropriate use of images of children to the County Safeguarding Officer and the ECB Safeguarding Team

Using Video as a coaching aid

Surrey Cricket has no intention to prevent Surrey Cricket Staff from using video equipment as a legitimate coaching aid. However, players, children/young people, and parents/carers should be aware that video equipment is a part of the coaching programme. Any material taken in connection with coaching, must be stored securely and deleted or destroyed when a parent requests this, or when the material is no longer needed.

Information

1. It's not an offence to take appropriate photographs in a public place even if asked not to do so.
 2. No one has the right to decide who can and cannot take images on public land.
 3. If you have serious concerns about a possible child protection issue relating to the recording of images, then call the police. This action should only be taken when you believe that someone may be acting unlawfully or putting a child at risk;
 4. The land or facility owner can decide whether photography and or videoing at cricket activities will be permitted when carried out on private land. However, you need to make this known before allowing individuals access to private property. If they do not comply then you may request them to leave.
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5. If you are commissioning professional photographers or inviting the press to cover a Cricket activity, ensure you and they are clear about each other's expectations.

It is best practice to plan ahead and communicate early on:

- Provide a clear brief about what is considered appropriate in terms of content and behaviour.
- Inform them of Surrey's commitment to safeguarding children and young people and establish who will hold the recorded images and what they intend to do with them.
- Issue the professional photographer with identification, which must be worn at all times;
- Inform participants and parents or carers prior to the event that a professional photographer will be in attendance and ensure that you have established that there are no under 18s

will be compromised due to child protection concerns if their image is taken- remember this can be done by using the annual consent form at the start of the season

Public Information

The specific details concerning photographic, video and filming equipment registration should, where possible, be published predominantly in event programmes and announced over the public address systems prior to the start of the event. The recommended wording is:

“In line with recommendations of the Surrey Cricket's Safeguarding and Protection Policy, the promoters of this event request that any person wishing to engage in video, zoom or close-range photography should register their details with staff at the event organiser's desk before carrying out such photography. The promoter reserves the right of entry and reserves the right to decline entry to any person unable to meet or abide by the event organiser's conditions.”

Parents and other spectators intending to photograph or video at an event will be asked to complete a self-declaration form.

Guidelines for Surrey Cricket when using images of young people for publication, promotion, or coaching.

Sports organisations and clubs' benefit from using images of young participants to promote and celebrate activities, events, and competitions. Some coaches also find it helpful to use photographs or videos as a tool to support a young athlete's skills development.

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. You'll also need to consider whether **parental permission for photography** should be sought, and take **storage and privacy** considerations and additional concerns about **talented young athletes** into account.

Minimising the risks

- think carefully before using any images showing children and young people on your website, social media or other publications
- choose images that present the activity in a positive light, and promote the best aspects of the sport and organisation
- don't supply full names of children along with the images, unless:
 - it's considered necessary – such as for **elite young athletes**
 - it's in the child's best interests
 - the child and parent have consented
- only use images of children in suitable dress or kit, including recommended safety wear such as helmets, pads etc..
- provide coaches who use images of athletes as part of their training with clear guidelines by which they are required to comply, including: use of the images, consents, and **retention, safe storage and confidentiality**

Using official or professional photographers

You should establish and clarify many of these points as part of the commissioning or contracting process:

- inform parents and children that a photographer will be in attendance
 - ensure parents and children consent to both the taking and publication of films or photos – see our sample: **filming and photography consent form**
 - check the photographer's identity, the validity of their role, and the purpose and use of the images to be taken
 - issue the photographer with identification which must be always worn
 - provide the photographer with a clear brief about what is considered appropriate in terms of image content and their behaviour
 - clarify areas where all photography is prohibited (toilets, changing areas, first aid areas, and so on); for more on this, click on the 'Mobile phones and cameras in changing rooms' tab above (or below, on mobile devices)
 - inform the photographer about how to identify – and avoid taking images of – children **without the required parental consent** for photography
 - 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
 - clarify issues about ownership of and access to all images, and for how long they'll be retained and/or used
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Responding to concerns

All Surrey Cricket 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 a safeguarding procedure in place to ensure that reported concerns are dealt with in the same way as any other child-protection issue.

Ensure that the Surrey Cricket event organiser, or lead child safeguarding officer is informed. Concerns about professional photographers should also be reported to their employers.

If there are concerns or suspicions about potentially criminal behaviour this should include referral to the police.

When to seek parental permission

Close-up images

- seek the consent of parents to take and use images of individual or smaller groups of participants in which their child would easily be recognisable – you can adapt our **filming and photography consent form** template to suit your organisation
- let parents know 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
- make parents aware of your policy on using children's images, and of the way these represent the organisation or activity
- complete a parental consent form for the use of images of children, possibly as part of the process for registering and consenting the child's participation in the activity or event
- ask for the child's permission to use their image – you could have them fill in a **consent form** to ensure they're aware of how the image may be used
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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 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.

What to do when parental consent is not given

Organisers have a responsibility to put in place arrangements to ensure that any official or professional photographers can identify (or be informed about) which children should not be subject to close-up photography. This should be done in consultation with parents.

Some suggestions are:

- providing some type of recognisable badge, sticker or wrist band
- a system for the photographer to check with the activity organiser and/or team manager to ensure that it's clear which groups or individuals should not feature in images

Secure storage of images

Images or video 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

Avoid using any personal equipment to take photos and recordings of children – use only cameras or devices belonging to your organisation.

If you're storing and using photographs to identify children and adults for official purposes – such as identity cards – ensure you comply with the legal requirements for handling personal information. For guidance on the Data Protection Act and other privacy regulations, visit the **Information commissioner's office (ICO)** website.

Talented young athletes

As young athletes progress up the competitive ladder, their sporting success can lead to an increased public profile:

- elite-level events are more likely to take place in a public arena
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- event organisers and sport's governing bodies will look to positively promote their sport
- elite young athletes who receive endorsements or sponsorship may welcome positive media coverage on a local, regional or national level

In these cases, some aspects of our guidance around the use of images and publishing identifying information are neither practical nor desirable.

However, organisers retain their duty of care to these athletes and a responsibility to safeguard them. They must ensure that the athletes and their parents' consent to images

being taken and what information will be published alongside them. And it's important that our other good-practice guidance regarding supervision and the nature and use of images is still applied.

In addition, athletes, their parents and media representatives need to be clear about appropriate arrangements and ground rules for interviews, and for filming and photo sessions. Sports organisations should help to manage these issues as part of their overall **support of elite athletes**.

Use of CCTV in leisure facilities

If a leisure facility intends to use a live video stream of leisure activities for parents to spectate, which is displayed in public areas, facilities should make sure that:

- all customers are aware
- images are not recorded
- footage is shown without sound this (reduces potential identification of individuals)
- any cameras provide wide-angle, general views of the pool or court
- there are arrangements in place to respond to any concerns about anyone watching the stream whose behaviour gives cause for concern

Surrey Safeguarding Officer

Email: Safeguarding@surreyccricket.com

Telephone 07843977020

ECB Child Safeguarding Team

Email: ECB Safeguarding Team <safeguarding@ecb.co.uk>

Telephone 020 7432 1200

(The above policy has been developed from ' ECB Guidance on Photography and Video Camera Guidelines from the Club "Safe Hands" Crickets Policy for Safeguarding Children and The FA.Com Celebrating Football through Photographs and Video "Child Protection Policy, Procedures and Implementation Guidance for Grassroots Football" and the Child Protection in Sport Unit [Photography – safeguarding children in sport | CPSU \(thecpsu.org.uk\)](https://www.thecpsu.org.uk)

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