

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. [For advice visit the Child Protection in Sport website.](#)

The **guidance** below is for organisations wishing to use or permit the use of images of children involved in their activities who 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 shin pads or gum shields
- activities such as swimming, gymnastics and athletics present a higher risk for potential misuse than others, so images of these activities 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
- consider using models or illustrations if you are promoting an activity, rather than the children who are involved in it
- 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 worn at all times
- 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

Responding to concerns

All 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 your club or event organiser, or lead child protection or 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 parents' consent 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 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 **permission form** to ensure they're aware of how the image may be used

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.

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 could involve providing some type of recognisable badge, sticker or wrist band, and/or a system for photographers to check with the activity organiser and/or team manager to ensure 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
- event organisers and sports 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](#)

Photography by parents and spectators at events

Most spectators – especially competitors' family and friends – will want to take photos or videos at sports events.

Organisations responsible for sports and activity events must have a photography policy and procedures in place to safeguard children. As part of their planning process, they'll

need to factor in any additional facility or venue policies, as well as determine what stance to take on **when photography by the public is allowed**.

Although parental consent is not required for photography by the public, event organisers should make the photography policy clear to all participants and parents ahead of the event.

Minimising the risks

- decide on a spectator photography policy during the planning stages of the event:
 - **a total ban on any photography**
 - **registration of individuals who intend to take photos**
 - **no overall public photography ban for the event**
 - **the event venue is a public area, so no ban is possible**
- clarify and promote the photography rules for the event to all staff, volunteers, spectators, parents and young participants
 - in these rules, include areas where photography is banned; for more on this, click on the 'Mobile phones and cameras in changing rooms' tab above (or below, on mobile devices)
- warn parents 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 care should be taken about 'tagging'
- establish procedures to respond to and manage any concerns arising, including clear reporting structures and a system to contact police when necessary

Getting the message across

There's a range of ways event organisers can inform stakeholders about their photography policy, including:

- pre-event registration, consent or information forms
- packs and leaflets for all event staff and volunteers, participants and parents
- pre-event induction or training for staff and volunteers
- event programmes

- posters and signage around the venue
- public-address announcements during the event

Responding to concerns

All 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 your club or event organiser, or lead child protection or safeguarding officer is informed.

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

Options for spectator photography policies

Photographic policies can range from total bans on image-taking, to no restrictions (other than those that are covered by the law). Here, we look at the pros and cons of each option.

Banning public photography

With the widespread use of smartphones, tablets and other equipment that can take photos, there are challenges in seeking to impose an outright ban on photography by parents and spectators.

Clear communication to all parties is key to this approach, together with well-publicised systems for anyone to raise concern about breaches of these rules.

Advantages and challenges

Many operators of closed facilities (for example, some swimming pools) prohibit any unauthorised photography. Others may impose bans in specific areas within the facility. Event organisers need to establish, comply with and promote any venue policies or procedures, regardless of their own.

A total ban may make policing the rules more straightforward – although the use of phones may remain an issue – and provides a clear message from organisers about their commitment to safeguarding.

However, a ban can be difficult to enforce, given the number of devices with which images can be taken.

A ban may be very unpopular with parents and other spectators who wish to record the efforts and achievements of their children or friends. A compromise is to let them have access to official photographs of the event.

Registering individuals who wish to take photos

Many event organisers require anyone wishing to take photographs to register. Communicating this to the public is essential, together with establishing a straightforward process for doing so.

Usually, individuals will register via a basic form and receive a sticker or equivalent to indicate they have undergone the process.

Staff, volunteers, participants, parents, spectators and the public need to be both informed about this process and encouraged to report anyone apparently taking photos without the necessary registration.

Advantages and challenges

This system has the advantage of providing a clear message about the organisers' commitment to safeguarding, potentially deterring individuals with bad intent.

It may provide identifying information about someone should concerns arise, depending on the thoroughness of any identity-checking included in the registration process. And when well advertised, it effectively enlists many spectators in 'policing' the rules.

However, registration itself clearly requires resources and time (including for spectators). Unless it's linked to some form of robust identity check, it won't provide a mechanism to identify individuals should concerns subsequently arise.

It may provide someone with bad intent with apparent legitimacy for their actions in terms of having official permission to take photographs of participating children.

No outright ban on photos

Some organisations have opted not to ban all photography. Instead, they proactively promote guidance about those specific areas where photography is not permitted under any circumstances (for example, toilets and changing areas).

You should provide the public with key messages about the **risks associated with online postings**, and encourage them to report any concerns about anyone's behaviour in this context.

Advantages and challenges

This approach has the advantage of not requiring any registration system (other than for official and professional photographers attending the event).

It focuses more on the concerning aspects of photography being undertaken, rather than photography itself. It acknowledges that many spectators will wish to take photographs, while also promoting safeguarding messages.

This system relies on a high level of public awareness of what behaviours should raise concerns, and of the event's process for reporting and responding to reported concerns. It provides no process to secure identity details of any spectators.

Photography at open event sites

In general, members of the public are entitled to take photos in public areas, whether or not this includes taking images of children involved in sports events or activities.

Regardless of any policies or procedures governing photography by those involved in or watching sports events, organisers have no right to impose these rules on other members of the public accessing or using the same public spaces.

However, if there are any indications or concerns that an individual may be taking images of children or young people that are inappropriate or illegal, this should immediately be reported to the organisers, who have responsibility for contacting the police.

This could include images of children taken in changing areas or toilets. Or images taken in ways or from angles that suggest inappropriate or abusive intent – for instance, when a camera or other device is operated at ground level while pointing up girls' skirts.

Organisers should have in place and actively promote clear ways for anyone to report concerns they have about photography or any other aspect of children's wellbeing.

Photography in changing rooms and showers

A growing number of incidents involving inappropriate or illegal photography of children in changing and shower areas of many **sports and leisure facilities** are being reported.

What are the risks?

Some incidents clearly involve an individual with bad intent deliberately targeting a vulnerable child to take and misuse images. These images 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.

Minimising the risks

Many facility operators have put in place policies and procedures to reduce the likelihood of such incidents taking place. These almost always include imposing a ban on photography of any form in these areas of the facility (regardless of rules that apply in other areas). Such bans cover participants, spectators, all staff and volunteers.

It can be difficult to be sure whether someone using a mobile phone is actually taking photos or videoing their environment. In order to further deter photography in changing and shower areas, some operators have banned the use of mobiles and other equipment capable of taking images altogether from these areas.

It's important that all users, staff and volunteers within the facility understand the operator's stance on photography. For instance, policies can be communicated through clear signage and posters.

Responding to concerns

Everyone should be made aware of what they should do if they have concerns about the behaviour of any other person in this context.

If anyone is suspected of taking images of children (or adults) in a state of undress, the facility manager or safeguarding lead should be informed immediately and the police consulted.