Photography and Filming Policy

Number:	SGPFP-01	**Issue:**	1.0	**Issue Date:**	October 2026
Approved By:	Sport & Communities Director				

1.0 Purpose and Scope

1.1 Active Bolton strives to ensure that all children (anyone under 18) and adults at risk are safeguarded from abuse and have an enjoyable experience when taking part in our activities and events.

1.2
- protect children who take part in Active Bolton activities and events, specifically where photographs or videos may be taken;
- set out the overarching principles that guide our approach to photographs and videos being taken of children during our events and activities; and
- ensure Active Bolton operates in line with its values and within the law when creating, using and sharing photographs or videos of children.

1.3 This policy applies to all employees, coaches, volunteers, players, parents, carers and any other individuals associated with Active Bolton.

2.0 What We Recognise

2.1
- sharing photographs and videos of our activities can help celebrate children's successes and achievements, provide a record of activities and raise awareness of Active Bolton;
- the welfare of children taking part in our activities is paramount;
- children and their parents or carers have a right to decide whether a photograph or video is taken and how it may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation;
- consent is meaningful only when children and their parents or carers understand how photographs and videos will be used and stored, and are aware of the potential risks associated with their use and distribution; and
- there are potential risks associated with sharing photographs and videos of children online.

3.0 Risks of Sharing Photographs and Videos Online

3.1
- children may become vulnerable to grooming if a photograph or video is shared alongside information that makes them identifiable, including personal details, location tags or visual details such as a school or venue uniform;

• inappropriate photographs or videos of children may be shared online;

• photographs and videos may be copied, downloaded, screenshotted or shared by anyone;

• photographs and videos may be adapted and used inappropriately;

• photographs and videos may appear in internet search results;

• depending on an online platform's terms and conditions, uploaded photographs or videos may be owned or licensed by the platform and used by third parties, including for commercial purposes; and

• each photograph or video, and any comments attached to it, can become part of a child's public image.

4.0 How Active Bolton Will Keep Children Safe

• obtain written consent from the child and their parent or carer before taking and using a child's photograph or video;

• explain what photographs and videos will be used for, how they will be stored and the potential risks associated with sharing them;

• where consent is withdrawn, take reasonable steps to remove photographs or videos from public view, while recognising that it may not be possible to delete all copies already distributed online or in hard copy;

• use only children's first names unless using further identification is necessary, in the child's best interests, and specifically consented to by the child and parent or carer;

• never publish personal information about children;

• explain how photographs and videos will be securely stored, for how long and how access will be controlled;

4.1 • use photographs and videos showing children in appropriate clothing and avoid images or camera angles prone to misinterpretation or misuse;

• avoid full-face and body shots during activities such as swimming where there may be a heightened risk of misuse;

• use photographs and videos that positively reflect children's involvement;

• use business devices unless this is not practical or possible and the use of a personal device is justified;

• undertake reasonable spot checks on personal devices to monitor compliance;

• set clear expectations for staff, volunteers and young players regarding consent and personal-device use; and

• respect the wishes of children and parents or carers who do not consent, agree how they will be identified to the photographer or videographer, and never exclude a child from an activity because consent has not been given.

5.0 Photography or Filming for Personal Use

5.1

• photographs or videos taken by a parent or carer, or another adult with their express permission, of their child are permitted;

• people should check their social-media privacy settings to understand who can view photographs or videos they share;

• children and parents or carers will be reminded who they can speak to if they have concerns about photographs or videos being shared; and

• for specific events, Active Bolton will publicise what photography and filming is permitted before the event starts.

5.2 Where a player enters a private arrangement with a commercial photographer or videographer, that professional must have the player's express consent, or the consent of the parent or legal guardian where the player is under 18, and must notify Active Bolton and the relevant event organiser in advance.

6.0 Using Official or Professional Photographers

6.1

• follow a safe recruitment process;

• give the photographer or videographer a clear brief covering appropriate content and behaviour;

• require identification to be worn at all times;

• inform children and parents or carers that a photographer or videographer will be present and obtain written consent for close-up images;

• explain how to identify and avoid photographing or filming children without the required consent;

• identify areas where photography and filming are prohibited, including toilets, changing areas and first-aid areas;

• not permit unsupervised access to children;

• not permit sessions outside the event or at a child's home; and

• report concerns about inappropriate or intrusive photography or filming.

6.2 At some events, wide-angle or general images of the event, site or award ceremony may be taken. Where obtaining individual consent would not be reasonable, practical or proportionate, Active Bolton will clearly inform participants and parents or carers that these images will be taken and explain their purpose.

7.0 Photography or Filming for Wider Use

7.1 Local journalists, professional photographers or other external media representatives must obtain Active Bolton's permission in advance before taking or sharing photographs or videos at an event.

7.2
- the name and address of the person using the camera;
- the names of the children they wish to photograph or film, where possible;
- the reason for taking the images and how they will be used; and
- a signed declaration confirming the information is valid and the images will be used only for the stated reasons.

7.3 Active Bolton will verify the information, decide whether permission should be granted, confirm appropriate consent from intended subjects and their parents or carers, identify anyone without consent, and make sure the external photographer or videographer is easily identifiable.

8.0 Concerns

8.1 If someone appears to be taking photographs or videos without the necessary consent, Active Bolton reserves the right to require deletion of the images, ask the person to leave and, depending on the concern, follow safeguarding procedures.

8.2 Concerns about inappropriate photographs or videos will be reported to the Welfare Officer and, where relevant, the LTA Safeguarding Team. It may also be necessary to report the matter to the police.

9.0 Storing Photographs and Videos

9.1
- store photographs and videos securely and in accordance with data protection law;
- keep hard copies in a locked drawer and electronic files in a protected folder with restricted access;
- configure personal devices so photographs and videos are not automatically uploaded to cloud storage;
- not store photographs or videos of children on unencrypted portable equipment such as laptops, memory sticks or mobile phones;
- delete photographs and videos after their approved use and not repurpose them for personal use;
- state how long photographs and videos will be retained when consent is obtained;
- control access through measures such as password-protected folders; and
- delete images when they are no longer necessary and never retain them beyond the period for which consent was given.

10.0 Related Policies and Procedures

10.1 This policy should be read alongside the following Active Bolton policies and procedures:

- Anti-Bullying Policy;
- Codes of Conduct;
- Diversity and Inclusion Policy;
- Online Safety and Communication Policy;

10.2
- Use of Changing Rooms Policy;
- Safeguarding Policy;
- Safeguarding at Events, Activities and Competitions;
- Safe Recruitment Policy; and
- Data Protection and Retention Policies.

11.0 Policy Review

11.1 This policy will be reviewed every three years, or earlier where there is a change in national legislation, statutory guidance, safeguarding requirements or Active Bolton operating arrangements.

Updates of Policy:

Issue No	Description of Revision	Date
1.0	First Active Bolton issue, reformatted to the QMS policy standard and updated from the previous venue policy.	October 2026