

# PHOTOGRAPHY, FILMING AND LIVE STREAMING POLICY FOR JUNIOR CLUBS

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## INTRODUCTION

England Ice Hockey (EIH) acknowledges that photographic and video evidence can be used to celebrate success and support training and development of players.

It is important that children and young people feel happy with their achievements and have photographs and films of their special moments. Family and friends also want to be able to share the successes of their children when they have been part of a special event or activity. Equally, some children, parents or carers may not be comfortable with images of themselves, or their children being shared. For example, if a child and their family have experienced abuse, they may worry about the perpetrator tracing them online. Or those who choose not to have contact with some members of their family for whatever reason may decide to minimise their online presence.

It is also important to be aware of child protection and safeguarding issues when people are taking photos, filming, or live streaming at events. The potential for misuse of materials can be reduced if organisations are aware of the potential dangers and put appropriate measures in place.

Whereas you may be able to manage photography, when it comes to one individual declining consent, a live stream cannot be edited or filtered to avoid an individual and therefore livestreaming cannot go ahead without the consent of the parent/carer of every child taking part.

The EIH gratefully acknowledges the resources for best practice made available by the NSPCC's child protection in sport unit.

## PRINCIPLES

The interests and welfare of children taking part in sporting activities is paramount.

- Children and their parents/carers have a right to decide whether their images are taken, and how these may be used.
- Children and their parents/carers must provide written consent for their images to be taken and used.
- Consent is only meaningful when children and their parents/carers understand the nature of potential risks associated with the intended type, use and distribution of the images.

## RISKS ASSOCIATED WITH FILMING OR PHOTOGRAPHING CHILDREN

- The identity / whereabouts of a child or family being tracked by someone they wish to avoid contact with for any reason.

- Images which are shared online being altered and/or misused by unknown people who gain access to them.
- Images which are shared online being used to identify and groom children / families for abuse or exploitation.

## MINIMISE RISKS ASSOCIATED WITH FILMING OR PHOTOGRAPHY

- Parents/carers/children only give consent for photography/filming when they are fully aware of the risks and how and where the images will be used and/or shared. A consent form should be signed by all parents / carers and by children old enough to be asked for their own consent.
- Names, ages, or other identifying information should not accompany any published image.
- Children are not photographed in kit which might make them identifiable, or images are edited to remove such information.
- Images should positively reflect children's involvement in the activity (e.g., showing smiling participants rather than anxious or unhappy ones) and promote the best aspects of the sport.
- Images should only feature children who are fully dressed.
- Parents / carers are asked to avoid, where possible, capturing children other than their own in images, and if they do so, not to share those images without the consent of relevant other parents, or to obscure the faces of any other children.
- Volunteers, children, parents, and carers notify the club DSL if they have any concerns about images which are being captured, or any misuse of images.
- Recordings made for training analysis should be deleted when they are no longer required.
- If at any time a player or parent withdraws consent for images to be used, then all images featuring them should be destroyed or securely archived to avoid inadvertent or accidental use at a later date.
- Do not reuse old images where it is unclear whether up to date consent is held for their use.

## MINIMALISE THE RISKS WITH LIVE STREAMING

### BEFORE THE EVENT

- The host club must inform opponents at least 5 days in advance that they wish to live stream or upload for public viewing their match.

- The host club are responsible for ensuring the visiting team are aware of the intention to live stream. Clubs should complete and send the EIH live streaming consent part 1 to outline the details of the live stream proposal. This will enable their opponents to check that consent will be given by all members of their team and to inform the host club of any objections.
- Written consent must be obtained from the parent / guardian / carer of all children, young people, or vulnerable adults who are to be filmed.
- Written consent must also be obtained from anyone in your recording that is not part of a crowd and is easily recognisable, such as the match officials.

If **any** individual in these groups refuse to consent, the live stream cannot go ahead.

Live streaming means that you are not able to edit/review your video content before it is uploaded. Live streaming can therefore be both unpredictable and hard to moderate. In some instances, it can lead to accidentally sharing more information than you intended. Clubs should be aware that their safeguarding responsibilities require them to ensure adequate privacy protections are in place to keep content safe from exploitation or sharing and to remove inappropriate content or messaging.

At the start of the season the club should choose a live streaming platform that will be used to stream games, in order that the person responsible can familiarise themselves with the platform to understand how it works, how it is set up and what security/privacy settings can be placed on the stream. You should always ensure that you can prevent your streams from being distributed or embedded.

It would be best practice to put up posters around the venue to make the spectators aware that live streaming will be taking place. This does not need to be detailed but should make spectators aware if the crowd might feature on the livestream, and who to speak to about any concerns. Clubs may also wish to consider setting up a separate seating area for people who do not wish to be filmed.

## DURING THE EVENT

- The live stream will need to be monitored throughout its whole duration.
- The live stream should be stopped immediately in the event of the welfare of any child, young person or vulnerable adult is put at risk. This would include audible bad language, abuse, or fights.
- Comments and use of the stream should also be monitored and any individual blocked or banned if inappropriate comments/use are made.
- Don't stream for longer than needed.
- Streaming should only begin a maximum of 5 minutes before the game faces off. This helps to prevent individuals getting hold of the stream and distributing it in unauthorised ways before the event starts.
- Be prepared to take the live stream down.



- Being prepared to take the stream down at any minute is vital. If the moderator identifies any inappropriate use of the feed or feels that the welfare of the individuals involved is at risk, they must stop the stream immediately.
- Focus on the game itself and not the individuals.
- The footage should be of the overall game itself and not be singling out individuals throughout the whole game. Keeping the stream as general as possible helps in protecting children, young people, and adults at risk from unwanted attention which can lead to them to be easily identified by individuals who may wish to harm them or identify them outside of the event.

## AFTER THE EVENT

- **Ensure the stream has ended.** Those managing the live stream must double check that it has actually ended. This avoids the risk of unintended or inappropriate footage being streamed.
- **Remove / Send / Download / Post the live stream.** Depending on what has been indicated on the live stream consent form, the club should take the appropriate steps to comply with the agreement.
- **Remove.** The club has stated that it will remove the live stream totally and keep the footage private after it this has been done.
- **Send.** The club has obtained consent of everyone involved to share the recording with the individuals that were involved within the live stream, such as the players and coaches, to use in coaching or team development.
- **Download.** The club has obtained consent of everyone involved to download the video and keep the footage on file for future use.
- **Post.** The club has obtained the consent of everyone involved to post the video on more platforms than it was streamed on (e.g., a club's YouTube channel). The EIH does not recommend posting livestream footage to internet platforms due to the more permanent nature of this, and the increased potential for misuse. In particular this may give adults intent on grooming and abuse the opportunity to study the footage and identify potential victims.

It can be difficult to keep ownership or control of a video once it has been posted on the internet. The video may be copied or reposted without your knowledge, and it can then become difficult to remove every copy online. Along with other social media platforms, YouTube has a private messaging function where users can send each other messages and videos.

- **Take statistics from the live stream.** Depending on your live streaming platform you may be able to take some statistics from the live stream such as:
  - Overall number of viewers.
  - How long the viewers watched for.
  - Location of the viewers.
  - Gender and age of the viewers.
  - Any noticeable trends and reactions to the stream.

Taking these statistics can provide you with some great insight into the stream and may assist you in improving your live streaming in the future.

## POOR SAFEGUARDING PRACTICE

With any form of photography, video and use of images there is always an inherent risk when children, young people or adults at risk are involved. Being aware of poor practice when it comes to photography, images, video, and live streaming will aid you in being able to spot it and change it instead of not being aware of being unsure and it is going ahead improperly.

- **Focusing on individuals**

The EIH guide for using images of people (2015) guidance notes that including a child's personal information – such as the name on their shirt- alongside their general image can make them identifiable. Therefore, focusing on specific individuals for long periods of time can lead to them becoming vulnerable to individuals looking to locate, contact or 'groom' children for abuse.

The focus on the team and the game is paramount to safe live streaming.

- **Never live stream from private areas**

Live streaming should always take place in a public area. It shouldn't take place from any private areas within a facility such as a meeting room or the changing rooms.

Keeping the stream set on the game and in the main venue allows for transparency and adhering to best practice when it comes to photography, video and images of children or vulnerable adults.

- **Too much information on the live stream**

Other details identifying the sports organisation, team or club, can be used to groom a child or vulnerable adult. Advertising alongside the live stream the venue name, team names, individuals' names involved in the game can potentially lead to individuals being identified by unwanted individuals e.g., an estranged parent due to previous concerns about domestic violence.

- **Leaving the stream unattended or not monitored**

Leaving the stream unattended or not monitored allows for standards to drop, inappropriate behaviour to creep into the live stream and potential unsuitable use of the live stream. Having it monitored and attended ensures that standards of practice around the live stream are kept high, the use of the stream is used for its intended purpose and if there is any inappropriate behaviour or misuse occurring it can be addressed swiftly.

## PHOTOGRAPHY AND/OR FILMING FOR WIDER USE

If people such as local journalists or professional photographers wish to record an event and share the images professionally or in the wider world, they should seek permission in advance. They should provide:

- The name and address of the person using the camera.

- The names of children 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.

The Club Designated Safeguarding Lead should verify these details and decide whether to grant permission for photographs/films to be taken. Consent must be obtained from the children (and their parents) who are the intended subjects of the images and their parents, and the photographer must also be informed of anyone who does not give consent.

Images captured should be checked and approved by the club DSL before being used.

Any authorised photographer should be issued with identification which should be worn at all times and returned to a designated club official at the end of the event. Measures, such as a specific colour coding for different sessions or events, should be used and regularly changed, to prevent unofficial replication of identification.

Clubs should be aware that copyright of any images taken by external photographers will belong to the photographer (or their employer if they are taking the photographs in the course of their employment). Commissioning or paying for photography does not alter this position unless this is specified in the contract.

## UNAUTHORISED PHOTOGRAPHY OR FILMING

If a volunteer or staff member notices an unknown or unauthorised person photographing or filming any session or event, they should note the person's description and contact the rink manager to make relevant enquiries and ask the person to leave the premises if appropriate. The Designated Safeguarding Lead should be made aware.

## PENALTIES FOR NON-COMPLIANCE

It is essential that all affiliated junior ice hockey clubs follow the requirements listed in this policy if they are considering introducing live streaming to EIH junior section league games or other competitive tournaments.

Failure to comply with this EIH policy will result in the following penalties being applied:

- For live streaming a EIH junior section game when consent has not been requested or has not been given by all participants – the match will be forfeited, and the game points will be awarded to the visiting team. The EIH will take immediate disciplinary action against the responsible club official(s) to reflect the serious nature of the violation.
- For persistent non-compliance – In addition to immediate disciplinary action against the responsible club official(s), the offending club may also be subject to a 10-point deduction for each of their registered junior league teams.

## OTHER CONSIDERATIONS

Images involving Junior players may also feature adults (coaches, volunteers, referees etc) and consent must be obtained from everyone who features in the image before it is published or used for any purpose.

If you are taking images at an event attended by large crowds, such as the conference finals, this is regarded as a public area, so you do not need to get the permission of everyone in a crowd shot. People in the foreground are also considered to be in a public area, however, we suggest that photographers address those within earshot, stating where the photograph may be published and giving them the opportunity to move away.

Remember that photos and video are classed as 'data' for GDPR purposes and must not be processed for any other purpose than they were originally collected for (e.g., a photo taken for a membership card cannot then be used for promotional or other purposes).



