

Hampshire FA Supplementary Guidance
for Clubs and Leagues
Spectator Photography at fixtures



Supplementary Photography Guidance

Hampshire FA works with clubs and leagues to provide grassroots football for children and young people across the county. This supplementary guidance has been developed in response to requests from clubs for further clarity around the issue of photography and filming at fixtures. The purpose of this guidance is to:

- Protect children and young people who take part in football activities, specifically those where photographs and videos may be taken
- Set out the overarching principles that guide our approach to photographs/videos being taken of children and young people during football activities
- To ensure that all participants within affiliated football operate in line with our values and within the law when creating, using and sharing images of children and young people

This supplementary guidance is developed from the latest guidance issued by the FA and the NSPCC:

<https://learning.nspcc.org.uk/research-resources/briefings/photography-sharing-images-guidance#article-top> . This statement should be read in conjunction with FA guidance – section 8.3

<https://www.thefa.com/football-rules-governance/safeguarding/section-11-the-complete-downloads-directory>



Legal Framework

This supplementary guidance has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. Summaries of the key legislation are available on NSPCC learning.

It is **not** illegal to take photographs or video footage in public places unless it is for criminal or terrorist purposes. There will be places where you have access as a member of public, but will have to ask permission or may be prevented from taking photographs/video footage altogether – you need to check the situation out on a case by case basis. Clubs should communicate to parents/carers and visiting spectators where restrictions apply at their venues.

There is no law against taking photos at public events, including of other people's children (Ask the Police, 2021). But parents or carers should gain permission before sharing photographs or videos of other people's children on social media.

Hampshire FA, in accordance with guidance from the CPSU, does not advocate the banning of photography or the use of videos of children (see <https://thecpsu.org.uk/help-advice/topics/photography#article-top>)



We believe that:

- Children and young people should never experience abuse of any kind
- We have responsibility to promote the welfare of all children and young people and to take, share and use images of children safely

We recognise that:

- Sharing photographs and films of our activities can help us celebrate the successes and achievements of our children and young people, provide a record of club and league activities and raise awareness of our footballing organisations
- The welfare of the children and young people taking part in our activities is paramount
- Children, their parents and carers have the right to decide whether their images are taken and how these may be used
- Consent to take images of children is only meaningful when children, their parents and carers understand how the images will be used and stored, and are fully aware of the potential risks associated with the use and distribution of these images
- There are potential risks associated with sharing images of children online



What are the risks of sharing images online?

- Children may become vulnerable to grooming if a photograph is shared alongside information that makes them identifiable. This includes: personal details; a tag with location information; visual details such as a football club badge
- Someone might make inappropriate or illegal images of children – some individuals may set out to take inappropriate images such as images of children changing, photos taken in toilets, or using a camera at ground level to photograph up girls' skirts. Images can easily be copied and edited, perhaps to create inappropriate images. Images shared privately online may be copied, downloaded, screenshotted or shared by anyone, possibly entering the public domain
- Depending on the terms and conditions of using an online platform, the image may be owned by the platform once it's been posted. Platforms may then license images for use by third parties, such as for commercial purposes
- Each photo or video, and any comments on them, become a part of a child's public image. This may affect them later in life – for example, it may affect how they see themselves, or how they are viewed when applying for a job



There's increased risk of identification of, and contact with, a child:

- By someone in circumstances where there are legal restrictions – such as if the child is in local authority care or placed with an adoptive family
- Where it's potentially dangerous to reveal the child's whereabouts to an estranged parent due to previous concerns about domestic violence, or where a child is a witness to criminal proceedings

Some children, parents or carers may not be comfortable with images of themselves or their children being shared. For example:

- If a child and/or their family have experienced abuse and they are worried about the perpetrator tracing them online
- Children who choose not to have contact with some members of their family may have decided to minimise their online presence
- Families may have religious or cultural reasons for choosing not to be photographed

Any of these circumstances may lead a parent/carer to withhold consent for a child or young person to be photographed or filmed during football activities and we would expect participants to respect any such request.



Gaining consent

Clubs and football organisations should ensure that registration documents include parent/carer consent to photography and filming.

If children, parents and/or carers do not consent to photographs being taken, the club (manager, coach, Club Welfare Officer/club committee) should discuss with each family how the situation will be managed both within the club and in the context of fixtures involving other clubs. No child should be excluded from activity because you do not have consent to take their photograph.

Pre-match arrangements

Hampshire FA recommends that information about consent to photography is shared between team managers/coaches as part of pre-match arrangements. Coaches should advise whether all squad players' parents have given written consent to photography and filming. Coaches should confirm whether this consent covers the sharing of images or footage on social media.

In the event that any player does not have consent, coaches should advise parents, prior to the fixture, that they are requested not to take photos or film during the fixture (without identifying the individual that has not consented) – opportunities to take team photos after the game can be offered as an alternative for any team in which all players have consented.



Images/footage for personal use

When children themselves, parents, carers or spectators are taking photographs or filming at match day fixtures, they should be reminded that these images and footage are for personal use only – photographs and footage should not be shared on social media without gaining consent from children, their parents and carers before sharing photographs and videos that include them.

Before sharing images of children on social media, adults should consider how widely images may be shared, how long they may remain available and how this may affect the children's long-term wellbeing. Parents and carers who want to share pictures or videos of their own children on social media should make sure they understand who else will be able to view images of their child.

For more advice on online safety, please visit:

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

Photography in changing rooms and showers

A growing number of incidents involving inappropriate or illegal photography of children in changing rooms and shower areas of sports facilities are being reported. All Hampshire FA facilities have designated changing rooms, showers and toilets as device free zones where photography and filming are not permitted. We would encourage all clubs to ban photography or filming of any kind in these areas of your facility by all participants, spectators, staff and volunteers and would recommend signage is installed to reinforce this messaging. If anyone is suspected of taking images of children (or adults) in a state of undress, the Club Welfare Officer should be informed immediately and the police consulted.



Summary advice for clubs

1. Ensure that the issue of consent for photography at fixtures is included on registration form – if consent is not given, discuss with the parent/carer how the situation is to be managed
2. Ensure that the issue of sharing images/footage on social media is included on registration form – if consent is not given, discuss with the parent/carer how the situation is to be managed
3. Ensure that managers consider photography and filming as part of pre-match arrangements – are both sets of parents/carers/players happy for spectators to photograph and film fixtures? Does this include sharing images on social media? Are there any restrictions on photography/filming relevant to your club venue? We would expect teams to respect the responses of opposition teams but note that it is not illegal to take photographs/footage in public places unless it is for criminal or terrorist purposes.
4. Advise parents/carers/spectators that if an opposing team requests that there is no photography/filming during fixtures, they will be asked not to do so, noting that in some circumstances this request will have been made due to particular safeguarding concerns. If photography/filming has been agreed this should be for personal use only unless consent has been agreed to share images/film on social media



5. If parents/carers/spectators are taking photographs or filming having been asked not to, club officials should remind their own spectators of the reasons why such a request may have been made in order to encourage co-operation. If there are any indications or concerns that an individual may be taking images that are inappropriate or illegal, this should be reported to the police.
6. If concerns are raised about images shared on social media, these should be reported to Hampshire FA Discipline or Safeguarding Teams via discipline@hampshirefa.com or safeguarding@hampshirefa.com

For further advice or support, please contact Hampshire FA Safeguarding Team: safeguarding@hampshirefa.com

