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# **PHOTOGRAPHY & FILMING POLICY**

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Version 1.1



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## Policy Statement

The Independent Gymnastics Association (IGA) recognises that photography and video can celebrate achievement, promote our sport and support coaching. We also recognise there are safeguarding and privacy risks if images of children and young people are captured, used or shared inappropriately.

IGA and its affiliated clubs are committed to:

- protecting children, young people and adults at risk from harm associated with images
- complying with applicable data-protection law and safeguarding guidance in each jurisdiction
- ensuring that photography and filming at clubs and IGA events is planned, lawful, necessary, and proportionate
- promoting good practice rather than banning photography altogether.

## Purpose & Aims

This policy aims to:

- set out clear expectations for photography, filming and image sharing across IGA and all affiliated clubs
- reduce risks of images being misused for grooming, bullying, harassment, or sexual abuse
- protect children's privacy and identity, including where there are additional risks (e.g. family court orders, domestic abuse, looked-after children)
- ensure compliance with data-protection and child-protection law in the UK, Ireland and the Channel Islands
- give practical guidance for clubs, events and venues on managing photography safely.



## Scope

This policy applies to:

- all IGA-organised events, competitions, displays, training and online activities
- all IGA-affiliated clubs and their sessions, events and programmes
- all staff, coaches, volunteers, welfare officers, contractors, photographers, videographers and media working under IGA or club arrangements
- all children and young people (under 18) and adults at risk taking part in IGA or club activities
- any image or footage captured on any device (camera, video, phone, tablet, drone, livestream, etc.).

Where there is a conflict between this policy and local law, the stricter requirement will apply.

## Legal and Regulatory Framework

**IGA and its clubs must comply with:**

- United Kingdom (England, Wales, Scotland, Northern Ireland)
  - UK GDPR and Data Protection Act 2018 for official image use and storage. [ICO](#)
  - National and devolved child-protection law and guidance (for example Working Together to Safeguard Children, National Guidance for Child Protection in Scotland, Co-operating to Safeguard Children and Young People in Northern Ireland).
  - Criminal legislation regarding abusive or indecent images, voyeurism and harassment.

**Republic of Ireland**

- EU GDPR and the Data Protection Act 2018; guidance from the Data Protection Commission on photographing children at events and in schools.
- Children First Act 2015 and associated guidance.

**Channel Islands (Jersey, Guernsey and dependencies)**

- Local data-protection laws modelled on GDPR and relevant child-protection legislation and guidance.
- NSPCC/CPSU guidance for sport on safe photography, filming, consent and image storage, which underpins this policy.

Clubs must consider any venue-specific rules (e.g. leisure centres, schools) in addition to this policy.

## Definitions

- **Child / young person:** Anyone under 18.
- **Adult at risk:** As defined in the IGA Safeguarding Policy.
- **Image:** Any still image or moving footage (photo, video, livestream, screenshot, etc.).





- **Official photography:** Images captured or commissioned by IGA or an affiliated club for legitimate organisational purposes (e.g. coaching, records, promotion).
- **Personal photography:** Images taken by parents, carers, family members or young people themselves for personal, non-commercial use.
- **Third-party photographer/media:** Any photographer, videographer, journalist or company not directly employed/volunteering with the club or IGA.

## Principles for Safe Photography and Filming

IGA and its clubs will:

- assume that images of children are personal data when children can be identified, and handle them accordingly under data-protection law
- minimise the amount of identifying information shared (e.g. avoid full name + close-up photo + location together)
- use group images where possible; focus on the activity rather than individuals
- seek consent where required and respect any refusal or withdrawal
- avoid images that are or could be perceived as sexualised, exploitative or degrading
- never allow photography or filming in changing rooms, showers or toilets (including covert recording)
- challenge and stop any unsafe or unauthorised photography.

## Roles and Responsibilities

**IGA will:**

- set this policy and keep it up to date with law and best practice
- provide guidance and templates (e.g. consent forms, signage)
- support clubs to implement the policy and respond to concerns.

**Clubs will:**

- adopt this policy (or an equivalent policy aligned with it)
- ensure it is communicated to staff, volunteers, parents and young people
- build photography into activity and event risk assessments.

**Safeguarding/Welfare Officers will:**

- advise on local implementation of this policy
- be a point of contact for concerns about images or filming.

**Coaches and staff will:**

- follow the policy in relation to images taken during sessions or events
- report concerns immediately.

**Parents, carers and spectators will:**

- follow venue/club rules on photography and filming
- not share images in ways that put children at risk.



#### **Children and young people will:**

- be told in age-appropriate ways how their images may be used
- be involved in decisions about their images wherever possible.

### **Consent and Young People's Rights**

Clubs must have clear systems for obtaining, recording and managing consent for official images, consistent with data-protection law and NSPCC guidance.

#### **Key expectations:**

- Consent is usually obtained from the parent/carer for children under the age where they can give their own informed consent under local law; older young people's own wishes must also be respected.
- Consent forms should explain:
  - what types of images may be taken
  - the purposes (e.g. coaching, club records, website, social media, press)
  - where images may appear (including named platforms)
  - how long they will be kept
  - that consent can be withdrawn at any time, and how.
- Extra care must be taken where:
  - a child is looked after, adopted, subject to a court order or at risk of being located by an abusive parent
  - a child or parent has expressed specific safety or privacy concerns.
- A record of who has not given consent must be clearly available to those taking images at events.

Personal, informal photography by parents at events will usually rely on a different lawful basis (e.g. purely personal use), but clubs still have the right to set ground rules to protect children.

### **Taking Images at Clubs and IGA Events**

#### **Official IGA / Club Photography**

Where IGA or a club arranges official photography or filming:

- only authorised individuals will take images in that capacity
- photographers will be briefed on acceptable/non-acceptable images and must wear visible accreditation
- organisers must have access to consent information so children without consent are not photographed for external use.
- Children who have removed the consent for photography events will be provided with a band at request. This will indicate to photography officials that they do not wish to be photographed. These can be requested at any point leading up to or during an event and can be collected by coaches.



### **Parents, Carers and Spectators**

Clubs should:

- explain clearly in event invitations and briefings whether and how parents can take photos
- consider restricting photography:
  - to designated areas
  - Communicate that they should only be taking images of their own children unless given written consent to do otherwise
  - to specific times (e.g. end-of-session “photo opportunity”)
- state that images taken must be for personal use only and must not be sold, misused or shared in ways that put children at risk (e.g. open public pages with location details).

Where concerns arise about someone’s behaviour with a camera or device, staff may:

- speak to them, remind them of the rules and/or ask them to stop
- ask them to delete images where appropriate
- ask them to leave or involve venue security / police if necessary.

### **Young People’s Own Devices**

Clubs should:

- set expectations for young people’s use of phones and devices in sessions, including if and how they may take photos
- prohibit taking or sharing images in changing areas or toilets
- make clear that cyberbullying, sharing humiliating images, or sharing sexual images of anyone under 18 may be offences and will be treated seriously.

### **External Photographers, Media & Commercial Partners**

Where external photographers or media are invited:

- they must be approved in advance and, where appropriate, sign in and show ID
- they must agree to follow this policy and any venue-specific rules
- details of how and where images will be used must be agreed beforehand
- children and parents must not be pressured to be photographed or interviewed.

## **Use, Storage and Retention of Images**

For official IGA and club images:

- images will only be used for the stated purposes
- access will be restricted to those who need it for their role
- digital images will be stored securely (e.g. password-protected systems, not personal devices or unencrypted USBs)
- hard-copy images will be kept in locked storage
- retention periods will follow IGA’s data-protection and safeguarding record-keeping policies; images will be deleted or anonymised when no longer needed.



## Online Use, Social Media, Livestreaming and AI

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When publishing images online or via social media:

- avoid using full names with close-up images of individual children
- avoid tagging children's personal accounts or enabling location tagging
- be cautious about livestreaming: consider closed platforms, access controls and moderation.
- do not use or allow AI tools to create sexualised, manipulated or deepfake images of children (this may be criminal and will be reported).

## Images for Coaching and Performance Analysis

Where images are used for coaching (e.g. slow-motion technique analysis):

- explain this in consent information and/or session information
- restrict access to relevant coaches and the gymnast/their parent
- store and delete in line with this policy
- ensure images are not reused for other purposes without fresh consent.

## High-Risk and Prohibited Practices

The following are never permitted:

- photography or filming in changing rooms, showers or toilets
- covert or secret recording of children
- images focusing on body parts that could be perceived as sexual
- encouraging children to pose in ways that are provocative or inappropriate for their age
- pressuring children to be photographed against their wishes
- sharing, possessing or creating indecent images of children (which is a criminal offence).

Any such concerns will be treated as a safeguarding matter and may also be reported to the police or relevant statutory agencies.

## High-Risk and Prohibited Practices

### Managing Concerns, Misuse and Breaches

Any concern about photography or filming should be reported to the club's Welfare Officer and/or IGA Safeguarding Team.

Examples include:

- a child or parent reporting discomfort or unwanted attention
- images appearing online without consent
- inappropriate comments on posted images
- suspicion that images are being collected for abusive purposes.





IGA/clubs will:

- respond in line with safeguarding procedures
- take steps to have inappropriate images removed
- consider reporting to statutory safeguarding agencies and/or data-protection regulators where required
- review and improve controls to prevent recurrence.

## Training, Communication and Implementation

IGA will promote this policy through:

- safeguarding training and briefings
- event organiser guidance
- templates and tools (consent forms, signage, FAQs).

Clubs must ensure:

- relevant staff and volunteers are familiar with this policy
- photography rules are included in induction, codes of conduct and event information
- parents and young people know where to find the policy.

## Monitoring & Review

IGA will review this policy at least every three years, or sooner if:

- legislation or regulatory guidance changes
- significant issues or incidents highlight new risks
- NSPCC/CPSU or national sports bodies update their recommendations.