



# British Gymnastics Photography Policy

## Approval

Approved by	Owner	Dept	Date
Standards Committee	Conduct & Disciplinary Manager	Integrity	February 2020
Board	Conduct & Disciplinary Manager	Integrity	March 2020

## Document History

Version	Summary of Changes	Document Status	Date
v0.3	Initial Policy Draft	Draft	29/01/2020
v1.0	Board Approval	Live	11/03/2020

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## 1. Background

- 1.1. British Gymnastics recognises that whilst we have a duty to ensure the welfare and protection of all participants, particularly children, those at risk or elite athletes, many of these participants as well as parents, coaches and other gymnastics enthusiasts may want to record events with the use of photography or videography.
- 1.2. It is not our intention to prohibit this activity, but to provide policy and guidance to ensure the continued safety of all our members.
- 1.3. The photography of gymnastics activity should always be done in a way which safeguards gymnasts, respects rights to privacy, complies with the relevant Data Protection legislation, and serves to present the sport positively.

## 2. Purpose

- 2.1. This policy has been created to bring together, standardise and update our guidance and documents regarding the taking of photographs and/or video in different gymnastics contexts and environments.

## 3. Scope

- 3.1. This policy applies to British Gymnastics, our registered clubs and affiliated organisations (unless there is an applicable home country equivalent).
- 3.2. This policy applies to all photography or filming carried out in any British Gymnastics regulated activity or environment, which includes:
- 3.3. Any competitions or events run by or on behalf of British Gymnastics, its registered clubs, or affiliated organisations. It also applies to other gymnastics activities, including during training or other activities.
- 3.4. The policy also applies to all British Gymnastics members and anyone else who is taking photographs in a British Gymnastics regulated environment.
- 3.5. This includes, but is not limited to, competitions, festivals, regular training sessions, workshops, courses, etc.
- 3.6. The activities of commercial photographers accredited by British Gymnastics for event photography are not covered in this policy but are agreed with the individual providers.
- 3.7. The policy does not apply to the use of images or video that have been taken for appropriate and purely personal purposes that are not shared or published in any format, which includes online publication via social media, except where access to images is restricted to the family and close friends of those featured in the photograph or video.

## 4. Policy Statements

- 4.1. All British Gymnastics clubs and members must ensure that any photographs or video of children is not used in a way that would place a child at risk of harm.
- 4.2. Photography or filming must not be used in a way that is inappropriate given the age of the participant and the context that the image was taken.
- 4.3. Photography or filming must not be used in a way that would cause damage or distress to any individual or in a way that could bring the sport into disrepute.
- 4.4. The live streaming of video footage is not permitted, except for major events where written prior approval has been obtained from British Gymnastics. This does not apply to the use of cameras as a means of providing an open training environment.
- 4.5. The taking of photography and filming of identifiable living individuals must be done in a way that ensures compliance with data protection laws. This includes:
- 4.6. Ensuring there is a legal basis for taking and publishing any photo
- 4.7. Ensuring transparent information is provided
- 4.8. Ensuring any images are stored securely and not held for longer than is necessary
- 4.9. When publishing images of children, the publisher must ensure there are appropriate safeguards in place to minimise the likelihood of anyone who is not authorised to view or use these images from doing so.
- 4.10. British Gymnastics recognises that the editing of images and video is commonplace, and whilst some editing is acceptable, images should not be edited in such a way as to cause embarrassment or distress to the subject or others or edited in such a way that the final image would be deemed inappropriate.
- 4.11. The use of photography should be strictly prohibited by any persons, including participants, in toilet, shower or changing facilities.
- 4.12. Any use of photography or video for marketing purposes that feature or is aimed at children should comply with any applicable advertising standards e.g. the Committee of Advertising Practice code
- 4.13. Any significant breaches of this policy will be managed in accordance with the British Gymnastics Complaints and Disciplinary policy and procedures

## **5. Definitions**

- 5.1. 'Photographs' or 'photography' are used in this policy to include any still images or video of identifiable living people.
- 5.2. 'Publication' is where photographs are shared in a way that makes them accessible to others. This includes online, such as on a website or social media, even where there are some levels of access restrictions, and in printed media including but not limited to publications, presentations and marketing material.

5.3. 'Personal Use' or 'Personal Photography' is used in this policy to define images taken by individuals to record the event which are not to be shared or published.

5.4. 'Personal-' or 'Consumer Photography Equipment' is used in this policy to mean equipment deemed appropriate for individuals to use in a personal capacity. This includes but is not limited to smart phone/tablet cameras, digital and bridge cameras and entry-level DSLR or mirrorless cameras.

Photographic or video equipment which is generally recognised as professional equipment or intended for commercial use, including but not limited to high performance DSLR or mirrorless cameras, telephoto or zoom lenses or users with multiple lenses are not considered appropriate to be used except by an accredited media photographer. Where there is dispute as to the capability of the equipment, the Event Organiser's decision is final.

## **6. Roles & Responsibilities**

### **6.1. Compliance, Monitoring & Review**

6.1.1. British Gymnastics is responsible for upholding the policy rules across the gymnastics community and any breaches of this should be addressed using the Complaints and Disciplinary Policy and Procedures and, where appropriate, event rules.

6.1.2. British Gymnastics and all Registered and Affiliated organisations are responsible for implementing the policy at any gymnastics activities, including competitions, events and gymnastics related social activities.

6.1.3. Clubs, event organisers and members should ensure that any photography taking place is done in line with the policy and procedures. Any breaches of this should be reported to the British Gymnastics Integrity Unit for further investigation.

## **7. Monitoring**

7.1. The policy will be reviewed upon significant changes in legislation, technological capabilities or at the relevant review point set by British Gymnastics governance procedures.

## **8. Interdependencies & Related Policies**

8.1. The policy should be used in conjunction with the British Gymnastics Safeguarding Policy, Health Safety & Welfare Policy and associated documents as well as the relevant Data Protection guidance which is in our GymNet Resources area. Some venues may also have specific rules and regulations regarding the use of photography, and these should be adhered to in addition to this policy.

## **9. Impact Assessments**

9.1. The policy has undergone Data Protection and Equality Impact assessment screening. No further assessment was required.

## **10. Procedures**

### **10.1. Photography at British Gymnastics Clubs**

- 10.1.1. Before taking any photography on behalf of a registered club or affiliated organisation, ensure that those individuals who will feature in the images and, where appropriate their parent(s) / guardian(s), are fully informed in advance
- 10.1.2. Unless an individual is a person of public interest e.g. an elite gymnast, no personal information of children, other than the name of the subject and the name of the club should be published with the images. It is advisable to use just the forename of the subjects rather than their full name.
- 10.1.3. British Gymnastics recognises that the editing of images and video is commonplace, and whilst some editing is acceptable, images should not be edited in such a way as to cause embarrassment or distress to the subject or others or edited in such a way that the final image would be deemed inappropriate.
- 10.1.4. Care must be taken to ensure that images are not published where there is a legal or safeguarding reason not to, such as those who are subject to a court order that prevents publication of images.
- 10.1.5. Any images should not be stored on portable equipment without encryption. Only photography taken for personal purposes should be stored or shared on personal devices or personal social media accounts.
- 10.1.6. To minimise the risk of photographs being used inappropriately, those responsible for creating/upkeeping the content for websites or social media feeds should regularly monitor their content to ensure that both the content and captions or text are appropriate.
- 10.1.7. Live streaming of images or video is not permitted except where images are sent directly to a monitor within a gym or event environment for the purposes of providing an open training environment.
- 10.1.8. Before taking any photographs or video footage, consideration should be made to ensuring the safeguarding of all gymnasts and appropriate control measures should be in place as well as ensuring compliance with applicable Data Protection law. Prior to publication, any imagery must be checked to ensure it is appropriate.

### **10.2. Photography at local or regional level or those not organised by British Gymnastics**

- 10.2.1. All procedures under Section 10.1 should be adhered to.

- 10.2.2. Anyone organising an event that is open to the public must ensure those attending, whether participants, coaches, officials or audience members know your rules around the taking of photographs. Clear notices should be displayed with photography guidance for those attending the event. Guidance may also be provided as part of the registration process or event handbook
- 10.2.3. 'Official' photographers may be used at public events by the event organiser. In these cases, the official photographer should be clearly identifiable and should adhere to this policy and any further guidance produced in respect of British Gymnastics accredited media or official photographers.
- 10.2.4. Event organisers should consider a designated location for the taking of photographs. A banner or plain backdrop is ideal for this, where available.
- 10.2.5. If the event organiser/welfare officer (or authorised representative of the event organiser/welfare officer) suspects inappropriate photography or filming, the officer/organiser should request the person to leave the venue and to surrender any film and/or delete any images relating to the event. Further assistance may also be requested from venue security or the Police.
- 10.2.6. Any person at an event, who has any concerns about any images being taken, by any person, should bring them to the attention of the event organiser or other designated person.
- 10.2.7. Where commercial photography organisations are being used to take photographs for the purpose of making and selling photographs to the audience at the event (and later via direct mail and their websites).
- 10.2.8. Only selected organisations with a formal agreement should be permitted access to the environment. The responsible organisation should ensure an appropriate agreement is in place that ensures appropriate safeguarding for participants. Any approved commercial photographers should be listed in the event information.
- 10.2.9. All agreements should be made following due diligence and will cover intellectual property (IP) and access/rights to images, conduct of photographers, services and commercial arrangements.

### **10.3. Photography at events organised by British Gymnastics**

- 10.3.1. All procedures under Sections 10.2 – 10.3 should be considered and adhered to as part of the event.

### **10.4. Media Accreditation:**

- 10.4.1. Anyone wishing to take photographs for anything other than personal use must have permission to do so from British Gymnastics.

- 10.4.2. Prior to the event, anyone wishing to take photographs for anything other than personal use should apply for Media Accreditation. More information and the application process is available on our website, here - <https://www.british-gymnastics.org/media-accreditation>.
- 10.4.3. Where a club/region wishes to have a photographer present at an event on their behalf, they must apply for Media Accreditation for that photographer prior to the event.
- 10.4.4. British Gymnastics reserves the right to not accept Media Accreditation applications at an event.
- 10.4.5. Media Accreditation permits the taking of photographs only in public areas. The taking of photographs is not permitted in non-public or private areas. For the avoidance of doubt; a non-public or private area includes any location which requires a pass, accreditation or wristband to enter. Public spaces include but are not limited to spectator seating areas and concourse, merchandising and fan-zone areas.
- 10.4.6. For those who have been granted Media Accreditation, the specific access permissions will be defined as part of the accreditation process and an on-site induction at the event. The type of equipment to be used must also be approved by British Gymnastics in advance of the event. British Gymnastics reserves the right to prohibit photography equipment being used which in its sole view is not suitable from a safety, security or welfare perspective
- 10.4.7. As a tenant of the venue in which the event is taking place, British Gymnastics must comply with specific regulations that may be part of the contract for hiring that venue. Therefore, for the avoidance of doubt, specific venue requirements or instructions from the venue staff may over-ride these regulations.
- 10.4.8. These rules may be superseded by the rules of the FIG (Fédération Internationale de Gymnastique) or UEG (Union Europeenne de Gymnastique), where British Gymnastics is organising an Event on their behalf, such as a World Cup or European/World Championship or another international event.

## **10.5. Non-accredited individuals**

- 10.5.1. For those who have not been granted Media Accreditation status, photographs may only be taken using personal or consumer photography equipment (defined in 5.4). British Gymnastics reserves the right to prohibit photography equipment being used which in its sole view is not suitable from a safety, security or welfare perspective, or where there is a belief that the images could be used for anything other than personal use given the specification of the equipment used.
- 10.5.2. Any concerns about the appropriate taking of photographs at British Gymnastics events should be reported to the Event Welfare Officer or Event Organiser.



- 10.5.3. Photography is only permitted in public areas. The taking of photographs is not permitted in non-public or private areas. For the avoidance of doubt; non-public or private areas include any location which requires a pass, accreditation or wristband to enter. Public spaces include but are not limited to spectator seating areas and concourse, merchandising and fan-zone areas.
- 10.5.4. Photography within competition areas (such as the Field of Play) is not permitted by any person. British Gymnastics will, however, endeavour to provide a designated photography area.
- 10.5.5. Where an area is provided by the Event Organiser or Commercial Partner for photographs in non-public areas (e.g. in the warm-up halls or other areas), this is permitted. Anyone using these should have the appropriate accreditation to enter these areas.
- 10.5.6. British Gymnastics reserves the right to review any photographs that have been taken at a British Gymnastics event to ensure that they are of a suitable and appropriate nature. British Gymnastics reserves the right to request that the individual ceases to take photographs, deletes any images and, if considered necessary, leaves the venue.
- 10.5.7. Telephoto zoom lenses are not permitted by non-accredited photographers. The exact size and type of lens that is prohibited is at the discretion of the competition organiser for any specific event, but in general lenses with a focal length greater than 135mm are not permitted.
- 10.5.8. Tripods, monopods or other photographic equipment stands are not permitted.
- 10.5.9. The use of flash photography or lighting is not permitted.
- 10.5.10. Photographic or video equipment must not be connected to external power supplies (i.e. for charging or to use power instead of batteries).
- 10.5.11. Any photography equipment, including but not limited to bags and cases should be appropriately stored and should not block aisles, stairways, seating areas or emergency routes & exits.

## **10.6. Broadcast or Streaming of images**

- 10.6.1. British Gymnastics may, from time to time, live stream or broadcast an event via BGTV or an accredited media company covering the event (such as BBC Sport). Where live streaming or broadcasting is to take place, participants, officials and members of the public will be advised. Any concerns regarding the nature of this filming should be raised with the Event Manager, the Event Welfare Officer, venue security staff or a member of the British Gymnastics Integrity Unit.
- 10.6.2. Further guidance on the application of Data Protection law in respect of Photography

10.6.3. Prior to undertaking any photography, you should refer to the British Gymnastics guidance and FAQs on Photography and Video, and for club events the Club Privacy Notice template and drafting guidance. These are available via the Resource Centre within GymNet under 'Data Protection (GDPR)'