



RLSS UK
Safeguarding

The Royal Life Saving Society UK (RLSS UK) Use of Photography and Film Image Policy

“Safeguarding is everyone’s business”.

RLSS UK is committed to safeguarding and promoting the welfare of children, and adults at risk and expects everyone involved in RLSS UK activity to share this commitment.

Author: Lee Heard and Richard Flavell supported by Safe LTD
Date: 21 April 2023
File Name: RLSS UK Use of Photography and Film Image Policy

© Copyright Statement

This document is confidential and shall not be used by anyone other than authorised employees of the Royal Life Saving Society (UK) RLSS UK), nor used or disclosed outside the RLSS UK (or its affiliates) without the express written permission of the Chief Executive. All title to and copyright in this document is retained within the RLSS UK.



Control Sheet

Document Review

Name	Title
Representatives of	S.E.D.A.G

Document Approval

Name	Title	Department	Signature	Date
Lee Heard	Charity Director	Charity		12/04/2023

Version History

Version	Amendment/Reason	Date
v1.0	Initial document	12/04/2023

Associated Documents

Document	Version
RLSS UK Adult at Risk Safeguarding Policy and Procedures	V1.0
RLSS UK Child Safeguarding Policy and Procedures	V1.0

Review dates

This document should be reviewed in line with the details in section 8 and updated to reflect relevant changes.



Contents

1.0 Policy statement.....	4
2.0 Introduction	4
3.0 Keeping Children & Young People Safe.....	5
4.0 Parent and Carer Consent	6
5.0 Best Practice Guidelines.....	6
6.0 RLSS UK premises or Private Land.....	8
7.0 Reporting Concerns.....	8
8.0 Procedural implementation and review	9



1.0 Policy statement

- 1.1 RLSS UK is committed to ensuring that children and adults at risk who participate in its activities including lifesaving, lifeguarding, community awards, education, sports, competitions and any other events have a safe, positive and enjoyable experience. All groups of people whatever their age, gender, language, disability, race, religion or belief, sexual orientation, socio-economic status and culture have the right to protection from abuse and to be treated fairly. Everyone involved with an adult who may be at risk is uniquely placed to recognise and respond to abuse and poor practice across RLSS UK.

2.0 Introduction

- 2.1 RLSS UK recognises that it has a responsibility to promote the effective management of the use of still and film images of those undertaking organised activities.
- 2.2 When this policy refers to images or imagery this includes video, digital imagery or any other means of recording and posting images (whether still or moving), including online or within social networks. For the avoidance of doubt, these guidelines also apply to live broadcasts on social media or other platforms.
- 2.3 It is essential any RLSS UK staff member or volunteer who is responsible for taking images at any event or during activities is aware of the RLSS UK Safeguarding Policy, has consulted an RLSS UK Designated Safeguarding Lead (DSL), and is made aware of this policy, acknowledges a copy of it and signifies they understand the content.
- 2.4 Images can only be taken of children and young people for the purpose of:
- celebrating RLSS UK activities,
 - communication and media
 - coaching and performance aids

Taking images for any other purpose is forbidden.

- 2.5 Third-party agencies can only be authorised to take imagery by a Designated Safeguarding Lead. These agencies may include:
- Reputable commercial photographers commissioned by the Designated Safeguarding Lead. The law allows them to retain the copyright of photographs they take.
 - The press and other media. Copyright rests with the photographer.
- 2.6 Where an internal or external professional/amateur photographer/video operator is appointed by the club/ event organisers/host organisation, all parents/carers and child/adult participants should be made aware of this in the event or activity details.



- 2.7 Internal and/or external professional/amateur photographers/video operators wishing to record an **EVENT** should seek permission with the club officials/event organisers/host organisation and receive clear instructions at an early stage. They should complete an [EVENT REGISTRATION FORM FOR PHOTOGRAPHERS](#) available to download here. Once permission has been granted the person concerned is given a form of approval or identification that they show to supervising staff or volunteers, event organisers or other persons who may challenge them.
- 2.8 An enhanced vetting check will be required where the photographer may have unsupervised contact with an individual child or adult at risk in a sports context. Photographers are not permitted to take images outside the event or activity being covered.
- 2.9 During the event staff, volunteer or event organisers suspect inappropriate photography or filming, they should challenge or exercise their authority to request the person to leave the venue and to surrender any film and/or delete any images relating to the event.
- 2.10 Any person present at an event who has any concerns about any images being taken, by any person, should bring them to the attention of the staff, volunteers, club officials, event organiser or other designated person. Alternatively, you should report this to the Police or Local Authority e.g. Children's Services or Adult Services.
- 2.11 These procedures will also apply to outside agencies and expectations around their conduct, the methods of taking imagery, the types of authorised images and retention must be agreed before any activity takes place.

3.0 Keeping Children & Young People Safe

- 3.1 In some circumstances taking an image of a child or young person could put a child and/or their family at risk, at the very least it could cause difficulties.
- 3.2 These circumstances could include:
- Where a child or young person has been removed from their family for his or her own safety or protection
 - Where the identity or location of a child should not be disclosed for legal or safety reasons.
 - There are restrictions in place regarding contact with a parent or carer following a family separation or by family court orders
 - A child or young person is a witness in legal proceedings.
 - The image contains sufficient personal information that could put them at risk of being groomed.
- 3.3 It is essential these considerations are taken into account before the decision is made to take any type of image.
- 3.4 Should there be any reason why images of specific children should not be taken this should be recorded on the Club and HQ safeguarding records. If there are any concerns the Designated Safeguarding Lead or Deputy should be consulted.



4.0 Parent and Carer Consent

- 4.1 RLSS UK will not permit photographs, video or other images of young people to be taken without consent.
- 4.2 The parents/ carers and the children and adults at risk must provide written consent for the use of photography, filming equipment and video image. [A PHOTOGRAPHY AND IMAGES CONSENT FORM](#) is available to download here.
- 4.3 If the child is under 16, consent must be obtained from a parent or carer (If the child is over 16, it's good practice to inform parents that photographs and/or videos of their child may be used if the child has given consent).
- 4.4 This consent should be obtained at the beginning of each season/term and it should be made clear to the parent or carer (and/or young person age 16 or over) it is for the duration of a specified period. Parents and carers (and/or young person age 16 or over) should also be informed they can withdraw this consent at any time. Should consent be withdrawn this will take immediate effect.
- 4.5 Parents and carers should be made aware they have an obligation to inform RLSS UK of any circumstances outlined at 3.0.
- 4.6 If there is an intention to take images at a one-off event written consent should still be obtained as above. This should be sought prior to the event.
- 4.7 In all circumstances the parent or carer should be informed as to how the images are to be used and stored.
- 4.8 At no time should an image be used for a use other than what it was intended for.

5.0 Best Practice Guidelines

- 5.1 All RLSS UK staff, including volunteers or anyone acting on behalf of the organisation must abide by these guidelines. To breach these guidelines may lead to disciplinary action.
- 5.2 The purpose of these guidelines is to conform to the RLSS UK Child and Adult at Risk Safeguarding Policy and Procedure. It ensures all photography is safe, fair and in the best interest of those involved in RLSS UK activities.
- 5.3 All children and young people featured in any club publication must be appropriately dressed.
- 5.4 All images should focus on the activity rather than a particular child and where possible use photographs that represent the broad range of children taking part in lifesaving.



- 5.5 No persons shall approve/allow photo sessions outside the events or at an individual's home.
- 5.6 Mobile phone cameras are not to be taken into changing rooms or toilets. This includes mobiles or other devices which can be used to take images of children and young people.
- 5.7 All images taken of children and young people should present a positive message about their participation in RLSS UK activity.
- 5.8 If there is a court order in existence regarding a child or young person, the image must not be published.
- 5.9 Any images of children and young people must not include their personal details such as their home address or the school they attend, including imagery that may place them at these settings.
- 5.10 Children and young people should not be taking images of each other whilst engaged in RLSS UK activity.
- 5.11 Parents/carers and spectators should be asked to register at an event if they wish to use photographic equipment including mobile phones other than for personal use.
- 5.12 Parents and carers should not be prevented from taking pictures of, or filming, their children.
- 5.13 It is recommended that images are destroyed two years after the date of consent form, in case family circumstances change, and unless further consent is agreed. This is particularly important if the publication will have a high profile for example, it will have wide circulation or be publicised at a conference.
- 5.14 There may be photographs or images on file. If it is intended to re-use older images or photographs which consent has been given), it is recommended that consent be renewed to use the images on an online platform.
- 5.15 RLSS UK, clubs and affiliated bodies have a duty of care to safeguard data and images so that they cannot be used inappropriately or outside the agreed terms under which consent has been obtained. Images can be stored digitally, on videotape, in prints or negatives or electronically, provided storage is secure.
- 5.16 Images must be maintained securely for authorised use only and disposed of either by return to the person, child, adult at risk or by shredding.



- 5.17 There is no intention to prevent staff and volunteers including (coaches, instructors, assessors, trainers, administrators, club officials, event organisers) using video equipment as a legitimate teaching aid. However, adult/child participants and their parents /carers should be made aware that this is part of the training programme and care should be taken in storing such films.

6.0 RLSS UK premises or Private Land

- 6.1 RLSS UK reserve the right to permit or forbid photography or filming on all club owned or leased land and facilities.
- 6.2 If RLSS UK activity is taking place on private land, the land or facility owner may decide whether or not photography or filming will be permitted. If taking imagery at a hired venue it is important to gain consent.
- 6.3 All RLSS UK staff, including volunteers who are engaging with or likely to engage with, children and young people should be made aware of this policy. If someone is observed breaching this policy RLSS UK should request the person to desist from taking imagery and may ask that person to leave the premises.
- 6.4 It is not an offence to take appropriate imagery in a public place even if asked not to do so. If this activity is thought to be inappropriate the police should be called.
- 6.5 When taking images at an event attended by large crowds, such as sports or competition events, this is regarded as a public area and so permission is not required from everyone in a crowd shot. People in the foreground are also considered to be in a public area, however, it is recommended that photographers address those within earshot, stating where the photograph may be published and giving them the opportunity to move away.
- 6.6 For an image of, for example, the winner of a competition at a sport event-with the crowd in the background-it will be necessary to get the competition winner's verbal permission and record the fact that this has been done.

7.0 Reporting Concerns

- 7.1 It is the responsibility of all members of RLSS UK to safeguard children, young people and adults at risk. It is essential any concerns about inappropriate use, adaptation or copying of images of children, young people and adults at risk are reported to the RLSS UK HQ Designated Safeguarding Lead following the Child Protection/ Adult protection and Safeguarding Policies.



- 7.2 In all situations, if you have serious concerns about a possible child or adult at risk protection issue relating to the recording of imagery, call the Police. This action should be taken where you believe that someone may be acting unlawfully or putting a child, young person or adult at risk at significant and immediate risk. Do not attempt to record, copy or otherwise distribute any indecent image or video of a child or adult at risk as evidence or proof.

8.0 Procedural implementation and review

- 8.1 These procedures were implemented on 1st May 2023 and will be reviewed on an annual basis or in response to changes in safeguarding legislation and/or best practice.