Photography and Filming Policy

Alton Football Club

Purpose and scope of this policy

Alton Football Club works with children, young people and families through training, matches, tournaments, holiday camps, development programmes and community events. The purpose of this policy is to:

- protect children and young people who take part in Alton Football Club's activities, particularly where photographs, video, livestreaming or digital images may be created or shared
- set out the principles that guide our approach to capturing, storing and sharing images of children
- ensure our practices reflect FA safeguarding standards, sector best practice (CPSU/NSPCC), and relevant legislation
- ensure that all staff, coaches, volunteers, parents, carers and partners understand their responsibilities when creating or using images of children

This policy applies to all staff, volunteers, match officials, parents, carers, spectators, partner organisations and any adults working on behalf of Alton Football Club.

Legal and Safeguarding Framework

This policy aligns with:

- The FA Safeguarding Children Policy & Procedures
- The FA Guidance Notes (including photography & filming, digital communications, social media, inclusion, and reporting concerns)
- The Children Act 1989 & 2004
- The Data Protection Act 2018 and the UK GDPR
- Working Together to Safeguard Children (2023)
- NSPCC/CPSU Image-Use Guidance

Our Beliefs

We believe that:

- children should never be exposed to harm, abuse or exploitation
- responsible photography can positively celebrate children's experiences and achievement
- children and parents/carers have the right to decide whether their image is taken or used

- informed consent can only be given when the purpose, storage, use and risks are clearly explained
- children's welfare and dignity take precedence over any desire to capture or publish images

Our Commitments

Alton Football Club will:

- seek written, informed consent from parents/carers and, where appropriate, children themselves before capturing or sharing images
- ensure consent covers: photography, video, livestreaming, social media and promotional usage
- allow children to withdraw consent at any time (noting that existing published material cannot always be recalled)
- never publish full names, addresses, school details, identifying uniform, or personal information
- ensure all images used reflect children positively and in appropriate clothing
- avoid capturing or sharing images in changing rooms, toilets or treatment areas
- provide parents and children with clear information about:
    - what images are being taken
    - how they will be stored
    - who will access them
    - how long they will be retained
    - how they will be shared
- ensure images are stored securely and in line with data protection and The FA's digital safety expectations
- prohibit use of AI-generated images of children or manipulation that changes their likeness
- maintain a clear reporting process for any misuse of images

Photography and Filming by Parents, Carers and Spectators

At matches, training and events where photography for personal (non-commercial) use is permitted, Alton Football Club will:

- clearly communicate our photography expectations at the start of the event and in materials/programmes
- remind spectators not to publish images on social media without the consent of all identifiable children
- encourage families to review their own social media privacy settings
- provide clear information about who to contact with concerns
- restrict photography where safeguarding concerns exist (e.g., looked-after children, court orders)

If any person captures images inappropriately, refuses to comply with requests, or behaves suspiciously, they will be asked to stop or leave and safeguarding procedures may be followed.

Photography and Filming for Club Use

Club photography or filming (training footage, website images, match clips, livestreaming, promotional media) will:

- be carried out only with the permission of the Club Committee
- use club-owned or approved equipment only
- be explained in advance to parents/carers, with written consent obtained where applicable
- avoid one-to-one filming of U18s
- ensure children know when filming is taking place and why
- ensure images are used in line with consent and stored securely

Use of Analysis or Performance-Tracking Technology

Where video is used for coaching purposes:

- footage must be stored on club systems or approved platforms
- parents/carers must be informed if third-party systems are used
- no private footage should be shared directly with U18s; parents/carers must always be included

Hiring or Authorising Photographers

Where the Club hires or approves an external photographer, we will:

- provide a written brief outlining acceptable behaviour and content
- ensure the photographer is clearly identifiable
- ensure they are never left unsupervised with children
- ensure they do not capture images off-site, outside the event, or in private settings
- obtain consent from all relevant children and parents, and/or carers
- require photographers to follow data protection and safe-storage principles
- remove any photographer whose behaviour is inappropriate

External Media, Journalists or Students

Where photographers not hired by the club (e.g., press, media students) request access, they must:

- seek permission in advance
- provide all requested identity and purpose information
- sign a declaration confirming appropriate use
- comply with Club rules on child protection, consent and conduct

The club will:

- verify identity and legitimacy

- communicate with parents/carers and seek consent
- ensure media personnel are supervised
- refuse access if safeguarding concerns exist

Livestreaming

In line with updated FA guidance:

- livestreaming must be committee approved
- livestreaming must never be done from personal devices
- parents/carers must give explicit consent
- livestreams should avoid showing spectators or children not involved
- comments on livestream platforms must be disabled or moderated
- recordings must be stored in line with GDPR and FA safety requirements

If Consent is Not Given

The club will:

- fully respect non-consent
- agree in advance how the child will be identified so photographers avoid them
- ensure this process does not isolate or exclude the child
- never prevent participation because consent is withheld

Storing Images

Alton Football Club will:

- store images securely in password-protected club systems
- restrict access to individuals with safeguarding clearance
- never store images on personal phones, cameras, laptops or unencrypted devices
- retain images for no longer than 2 years unless consent is renewed or legal/operational requirements apply
- securely delete images at the end of the retention period

Reporting Concerns

Any concerns about the misuse of images, inappropriate photography, or behaviour that raises safeguarding worries must be reported immediately to the Club Welfare Officer.
Where necessary, reports will be escalated to:

- Hampshire FA Designated Safeguarding Officer

- The FA Safeguarding Team
- Statutory services or police (if a child is at immediate risk)

Contacts

Club Welfare Officer
Name: Georgina Timmins
Email: safeguarding@altonfc.com
Phone: 07901 833532

Club Chairperson
Name: Carl Saunders
Email: carl@altonfc.com

Approval

Approved by the Club Committee on: 28 January 2026
Signed (Chairperson): Carl Saunders