



COMMUNITY  
SPORTS  
FOUNDATION

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**NEST**

# PHOTOGRAPHY & IMAGE SHARING POLICY

Date of Next Update: August 2026

## SCOPE

This policy applies to all Norwich City Community Sports Foundation ("Foundation") and The Nest's – Norfolk's Community Hub (The Nest) colleagues, including those on temporary contracts or who have been working at the Foundation through a recruitment agency for more than 12 weeks. It does not apply to agency workers who have worked at the Foundation or The Nest for less than 12 weeks, consultants or self-employed contractors.

This policy supersedes any previous guides prior to its issue date.

## POLICY STATEMENT

We take the safeguarding of all involved at the Foundation very seriously to ensure that everyone is safeguarded appropriately. This includes online via our website or social media networks, or in print advertisement for programmes or match day programme features. We believe that children and young people should never experience abuse of any kind.

We acknowledge the importance of children and adults feeling proud of their achievements and having a photograph or video to celebrate these moments. Many friends and family also want to be able to share the successes of their children with others. However, we must respect that some people may not be comfortable with images of themselves, or their children being shared.

We have the responsibility to promote the welfare of all children and young people and to take, share and use images of children safely.

### **The purpose of this policy is to:**

- Protect children and adults who take part in Foundation's services, events, and 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 adults during our events and activities
- To ensure that we operate in line with our values and within the law when creating, using, and sharing images of children.

Children are defined as anyone under the age of 18.

## Legal framework

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

- [Online abuse](#)
- [Child protection](#)

It is important to remember it is not a crime to take photographs on public land, however the Foundation will encourage good practice and may provide participants, parents and spectators with the photography code of conduct if necessary.

### **Risk of sharing images online**

Sharing of images of children on social media or other online platforms carries potential risks:

- Identifiable information, such as personal details, location details or school details, shared alongside a photograph may make the child vulnerable to grooming.
- Inappropriate images of children may be shared online.
- Photographs / videos may be copied, downloaded, screenshotted, or shared by anyone
- Photographs / videos of children may be adapted and used inappropriately
- Photographs / videos may appear in internet search results
- Depending on the terms and conditions of using an online platform, the photographs / videos may be owned by the platform once it's been posted. This means the image could be licensed for use by third parties, such as commercial purposes.
- All photographs / videos that are posted, 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.

We should always consider how widely images may be shared, how long they may be available for and how this could impact a child's long-term wellbeing.

### **The Foundation will:**

- Always ask for written consent from a child and their parents or carers before taking and using a child's image
- Ensure that children, parents and/or carers are informed of this policy before the child participates in a Foundation activity
- Explain what images will be used for, how they will be stored and what potential risks are associated with sharing images of children
- Make it clear that if a child or their family withdraw consent for an image to be shared, it may not always be possible to delete images that have already been shared or published.
- Changing the names of children whose images are being used in published Foundation material, wherever possible (and only using first names if we do need to identify them)
- Never publish personal information about individual children and disguising any identifying information
- Make sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information)
- Reduce the risk of images being copied and used inappropriately by:

- Only using images of children in appropriate sports clothing (a minimum of a vest or shirt and shorts)
- Avoiding full face and body shots of children taking part in activities such as swimming where there may be heightened risk of images being misused
- Use images that positively reflect young people's involvement in the activity.

Our procedure for reporting the abuse or misuse of images of children can be found in our 'Reporting a Safeguarding Concern' document on the Foundation's website, or you can directly raise a concern via the 'raise a concern' button on the website.

### **Photography Consent**

Participants, parents, and carers will generally be asked for photography and image / film sharing consent at each sign-up opportunity for the activity. If you wish to revoke this, please email the Foundation's Customer Engagement Manager.

Please be aware that it may not be possible to revoke images / films that have already been shared / published, however the Foundation will cease use of your child's image for future publications / advertisement / sharing. The Foundation will remove all images of your child from our photography folder to prevent accidental future use.

### **Use of Images**

The Foundation will only use images to promote relevant activities and events. Where possible, it may be more appropriate to focus on the activity with non-identifiable photographs (i.e., backs of head etc.); it is appreciated and accepted that this may not always be suitable or possible. These will be posted through official social media platforms, including but not limited to: Facebook, Twitter, Instagram, and TikTok.

These images will have the ability to be shared by our followers.

Images / videos will also be used to promote activities / events on our website and contribute to the design of our website:  
<https://www.communitysportsfoundation.org.uk/>

Images / videos may also be published in printed literature, including those linked with Norwich City Football Club, such as a match day programme, as well as used in internal presentations to contribute to design.

If you see the misuse of any Foundation images / videos raise a concern by either:

- Emailing a Designated Safeguarding Officer
- Reporting a concern via the safeguarding section of our website

If you believe the person in the photography is at risk of immediate harm, you must call the police on 999.

### **Photography and/or filming for personal use**

The Foundation understands that children, parents, carers, or spectators may want to take photographs or videos at our events for personal use only, however you must refer to the 'photography code of conduct' for those at Foundation events who are not Foundation staff or volunteers.

Under no circumstances whatsoever should photographs / videos be taken by anyone in children's changing rooms, showers, toilets and, in connection with this, all mobile phones carried by children must be switched off in such areas.

### **Photography and/or filming for Foundation's use**

Foundation staff and volunteers may use photography or filming to assist with their programme's activities, however this must only be done with the Foundation's permission and using our equipment.

Programme Leads must also ensure that children, parents, and carers are aware that photography and filming is part of the programme and give written consent.

Foundation photographers (professional and staff designated photographers) should:

- Focus on the activity rather than the individual child, where possible.
- Include groups of children rather than individuals, where possible.
- Ensure all those featured are appropriately dressed (a minimum of vest or shirt and shorts)
- Represent the broad range of children and young people participating in our activities

Only staff with a Foundation issued device are designated to take photographs / videos of children and young people participating in our activities.

As a Foundation we have our own in-house professional photography team whose aim is to help celebrate and promote football and active living. However, in the unlikely event we hire an external photographer for one of our events, we will seek to do the following:

- Provide the photographer with a clear brief about appropriate content and behaviour
- Ensure the photographer wears clear and obvious identification at all times
- Inform children, their parents, and carers that a photographer will be at the event and ensuring they have given written consent to images which feature their child being taken and shared
- Not allow the photographer to have unsupervised access to children
- Not allow the photographer to carry out sessions outside the event or at a child's home

- Report concerns regarding inappropriate or intrusive photography through our reporting procedures.

### **Photography and / or filming for wider use**

There may be times when local journalists, professional photographers (including those employed by the Foundation but with secondary employment) or students wish to record one of our events and share the images professionally or with the wider world. If this is the case, they must seek permission in advance.

They should provide:

- The name and address of the person using the camera
- The names of children they wish to take images of (if possible)
- The reason for taking the images and/or what the images will be used for
- A signed declaration that the information provided is valid and that the images will only be used for the reasons given

The Foundation will verify these details and decide whether to grant permission for the photographs / films to be taken. We will seek consent from the children who are the intended subjects of the images and their parents and inform the photographer of anyone who does not give consent.

At the event we will inform children, parents, and carers that an external photograph is present and ensure they are easily identifiable.

If the Foundation is concerned that someone unknown to us is using their sessions for photography or filming purposes, we will ask them to leave and (depending on the nature of the concerns) follow our safeguarding procedures.

### **Storing Images**

The Foundation will store photographs and videos of children securely, in accordance with our safeguarding policy and data protection law.

Electronic images in a protected folder with restricted access. Most images / videos will be stored for a period of 5 years. There may be times when some images / videos are kept for future marketing purposes, however the Foundation will endeavour to reconfirm photography permissions where practicable.

We will never store images of children on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

The Foundation does not permit staff and volunteers to use any personal equipment to take photos and recordings of children. Only cameras or devices belonging to the Foundation should be used.



## **Associated Policies and Procedures**

Safeguarding Children  
Photography Code of Conduct  
Reporting a Safeguarding Concern

## **Responsibility and Key Contacts**

This policy is approved by the Chief Executive Officer, who holds ultimate responsibility for its implementation and effectiveness. Operational responsibility for the policy content rests with the relevant Head of Department. The Compliance and People teams are jointly responsible for ensuring the policy remains up to date, aligns with current employment legislation, and reflects the values of both the Foundation and The Nest.

Line Managers are responsible for ensuring that all new employees read this policy and complete any associated training in place at the time as part of their induction.

Employees are responsible for ensuring that they understand and comply with this policy.

For contact details of the key contacts referred to in this policy, please ask your Line Manager.

**Policy Issue Date August 2024**

**Last Review Date**

**Date of Next Update August 2026**

This policy is next due for a general review on the above date. It may however be reviewed and updated earlier, in the event of a change in Foundation or The Nest requirements, or relevant legislation.