

Photography, Filming and Digital Images Policy



Photography, Filming and Digital Images Policy

1. Policy Statement

SOG Sports Complex Ltd (SOGSC) recognises that photography, filming and digital media are valuable tools for celebrating sporting achievement, promoting inclusion, documenting activities and supporting education, marketing and funding. At the same time, SOGSC acknowledges its overriding duty to safeguard children and adults at risk, protect personal privacy and comply with applicable data protection legislation. This policy establishes the standards governing photography, filming, livestreaming and the use of digital images within the Complex. It complements and should be read alongside the SOGSC Safeguarding Policy, Code of Conduct, Data Protection Policy, Social Media Policy, CCTV Policy (where applicable) and Conditions of Use.

2. Scope

This policy applies to all employees, volunteers, Board members, contractors, coaches, officials, hirers, sporting organisations, schools, Special Olympics Gibraltar activities, parents, spectators, accredited media, photographers and any other individual using cameras, mobile devices or recording equipment within the SOG Sports Complex.

3. Objectives

The objectives are to protect children and adults at risk; ensure photography is undertaken safely and respectfully; provide clear guidance to all users; support legitimate promotion of sporting activities; establish responsibilities for event organisers and hirers; and provide procedures for responding to concerns or misuse of images.

4. Principles

Safeguarding shall always take precedence over publicity. Images shall portray individuals with dignity and respect, never exposing them to unnecessary risk or embarrassment. Photography shall be proportionate, lawful and undertaken only for legitimate purposes. SOGSC reserves the right to restrict or prohibit photography whenever safeguarding, privacy, security or operational concerns arise.

5. Legislative and Policy Framework

This policy operates in conjunction with applicable Gibraltar data protection legislation, safeguarding requirements, human rights relating to privacy and the internal policies of SOGSC. Where activities are organised by Special Olympics Gibraltar, their safeguarding policies relating to athletes, coaches and volunteers shall also apply in addition to this policy.

This policy has regard to the safeguarding framework and guidance issued by HM Government of Gibraltar and the Executive Child Protection Committee (ECPC), including the HM Government of Gibraltar Safeguarding Children Policy (2017), as amended or superseded.

6. Roles and Responsibilities

The Board retains overall responsibility for governance. The General Manager is responsible for implementation and ensuring appropriate controls are in place. Supervisors are responsible for monitoring compliance during events. Event organisers and hirers remain responsible for obtaining any participant consent required for their activities and for complying with their own safeguarding obligations. Staff and volunteers must report any concerns immediately.

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7. Authorised Photography

Photography may be undertaken by SOG Sports Complex Ltd, participating organisations, accredited media, parents and spectators (subject to event rules), and authorised photographers. This section should be read in conjunction with Section 30.3 (Authorised Photography) of the SOGSC Safeguarding Children and Adults at Risk Policy (POL-0025). The General Manager or delegated supervisor may suspend or prohibit photography where safeguarding concerns exist or where instructions are not followed.

8. Photography by SOGSC

Official photography may be used for annual reports, newsletters, websites, social media, funding applications, promotional material and historical records. Only authorised personnel or authorised contractors shall undertake official photography on behalf of SOGSC.

9. Photography by Hirers

Hirers and event organisers must notify SOGSC in advance where photography, professional filming or live streaming forms part of an organised event and must ensure that appropriate arrangements are in place for any participant who has not consented to being photographed or filmed.

Schools, clubs and organisations hiring the Complex are responsible for ensuring that all necessary permissions and participant consents have been obtained. SOGSC is not responsible for obtaining consent on behalf of independent hirers but reserves the right to intervene where safeguarding concerns arise.

Appropriate close-up photographs may be taken during sporting activities or official events, provided they are respectful, promote participation and dignity and comply with the SOG Sports Complex Ltd Photography, Filming and Digital Images Policy.

10. Parents, Spectators and Media

Parents and spectators may normally take photographs for personal use unless advised otherwise. Images should not be published in a manner that places a child or adult at risk or breaches privacy. Accredited media must identify themselves to management before recording events and comply with any restrictions imposed. Permission to take photographs for personal use does not automatically confer permission to publish or distribute images of other identifiable participants, particularly children or adults at risk.

11. Children and Adults at Risk

Additional care should always be exercised when photographing children or adults at risk. Images shall never be exploitative, degrading or intrusive. Personal information should not accompany published images where identification could create safeguarding risks.

12. Restricted Areas

Photography and filming are prohibited in changing rooms, toilets, showers, first aid rooms, welfare rooms, medical treatment areas, safeguarding meetings, disciplinary meetings and any staff-only area unless expressly authorised for operational reasons.

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13. Live Streaming

Livestreaming may only be undertaken with the approval of SOGSC or the event organiser. Camera positions should avoid unnecessary close-ups of children and adults at risk. Commentary shall remain respectful and appropriate. SOGSC may terminate any livestream that presents safeguarding or reputational risks.

Where an event involving children or adults at risk is livestreamed, the event organiser shall ensure that appropriate consent arrangements are in place. Where an individual should not be filmed, reasonable arrangements shall be made to avoid capturing identifiable images of that individual.

Livestream operators should avoid unnecessary close-ups and shall not deliberately focus on distressed, injured or vulnerable individuals.

14. Storage, Security and Retention

Official digital images shall be securely stored with access restricted to authorised personnel. Employees and volunteers shall not use personal devices to photograph children or adults at risk while carrying out SOGSC duties. Images shall be retained only for legitimate organisational purposes and securely deleted when no longer required.

15. Social Media and Artificial Intelligence

Images published through social media reflect the values of SOGSC. Images shall not be manipulated in a misleading manner, including through artificial intelligence technologies, nor used in any way that undermines the dignity or safety of individuals.

16. Reporting and Breaches

Any concerns regarding inappropriate photography, filming or image sharing shall be reported immediately to the Designated Safeguarding Lead or the General Manager. SOGSC may require photography to cease, request deletion where lawful, remove individuals from the premises, terminate bookings, commence disciplinary proceedings or refer matters to the Royal Gibraltar Police or safeguarding authorities where appropriate.

17. Monitoring and Review

The General Manager shall monitor compliance with this policy. The Board shall review the policy at least annually or sooner following legislative, operational or safeguarding changes.

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Poster





PHOTOGRAPHY & FILMING NOTICE

Photography, filming and the use of digital images must be carried out responsibly and respectfully.

-  Take images that are appropriate, respectful and related to sporting participation or official events.
-  Obtain consent where required. Respect individuals who do not wish to be photographed or filmed.
-  Do not take or share images that are inappropriate, intrusive or could cause distress or embarrassment.
-  Do not share images on social media without permission.
-  Use digital images responsibly and store them securely.

 Please comply with the SOG Sports Complex Ltd Photography, Filming and Digital Images Policy.

QUESTIONS OR CONCERNS?

Speak to a member of staff or contact the Designated Safeguarding Lead.