1st Floor, Beech House, Millenium Park, Osbertown, Naas, Co Kildare, Ireland.



# PHOTOGRAPHY, VIDEOGRAPHY & USE OF IMAGES POLICY

### **Purpose**

The purpose of this Policy is to ensure best safeguarding Practice and Procedures exist to protect vulnerable members, as in children or vulnerable adults, as well as to facilitate and enhance the operations of Dressage Ireland.

### Scope

This policy covers only those images captured by Dressage Ireland at events under the control of Dressage Ireland. Dressage Ireland role as a data controller in the context of this policy is confined to these circumstances only. Dressage Ireland accepts no responsibility or liability in respect of images taken without written authorization by any other entity.

In principle, no other entity will be permitted to film or photograph at a Dressage Ireland controlled event without the written consent of Dressage Ireland. Where permission is granted, this will be stated clearly on any ticket or correspondence in relation to the event and displayed prominently at the event so that all attendees are made aware of same.

# **Policy Statement**

The procedures following are produced to ensure all Dressage Ireland staff, relevant volunteers and stakeholders have a clear understanding of the policy and how it applies to their role.

## What are the Risks?

1. Children may be identified, contacted or groomed

Including the child's personal information (full name, address) alongside their image can make them identifiable and therefore vulnerable to individuals looking to locate, contact or 'groom' children for abuse.

Even if personal details are kept confidential, other details identifying the sports organisation, or their favourite sportsperson, can also be used to groom the child.

There's increased risk of identification of, and contact with, a child:

- by someone in circumstances where there are legal restrictions such as if the child is in local authority care or placed with an adoptive family
- where it's potentially dangerous to reveal the child's whereabouts to an estranged parent due to previous concerns about domestic violence

# 2. Someone might make inappropriate or illegal images of children

Photo/video content may itself be inappropriate, or images may be used inappropriately or out of context:

- some individuals deliberately target sports activities and set out to take inappropriate photos in ways that are potentially illegal and harmful.
- images that appear ambiguous can be used inappropriately and out of context by others
- images can easily be copied and edited, perhaps to create child-abuse images
- images shared privately online can be re-shared, possibly entering the public domain on websites or social media

# Minimising the Risks

Dressage Ireland have set-out below a set of procedures as recommended by Tusla and other similar entities in the area of child protection to help minimise risks to children, young persons or vulnerable adults.

Dressage Ireland procedures are not about preventing parents and guardians from taking photographs/videos for their own domestic use and utilised in that context. Rather, Dressage Ireland wish to ensure that only those who have a right to take photographs do so. These procedures should still permit and facilitate the recording of relevant and suitable materials.

Dressage Ireland recognise that our coaches may wish to avail of the latest technology at training sessions and viewing performance but in a safe and non threatening manner and only with permission of Parents/ Guardians.

To avoid any concerns Dressage Ireland will where possible use illustrations when promoting an activity and avoid the use of the first name and surname of individuals in a photograph. This reduces the risk of inappropriate, unsolicited attention from people within and outside the sport. This is not to avoid parents/guardians taking photographs of their children but to ensure that best practice is put in place wherever and whenever photographs and recorded images are taken and stored.

# Use of Photography/Video

- A Written general parental permission shall be sought on application for membership
- A written more specific parental permission relating to any particular performance that is being sought to be use shall be obtained prior to the use the athletes' image, a consultation will occur to set the parameters with parents about its usage.
- Only use images of young people in suitable dress shall be utilised to reduce the risk of inappropriate use

- If you are concerned about the use of images inappropriately in Dressage Ireland, follow the child protection procedures outlined in *Dressage Ireland Safe Guarding Policy*
- Amateur photographers/film/video operators wishing to record an event or practice session where written
  parental approval has been obtained, must have the written authorisation of Dressage Ireland in advance
  of any filming or photography
- Dressage Ireland shall display the following notice at every Dressage Ireland controlled event to inform spectators of this policy: "Dressage Ireland will be filming at this event for our own quality and training purposes. Dressage Ireland personnel are clearly recognisable and have appropriate markings. Any other party filming at this event must be in possession of written authorisation from Dressage Ireland and prior notification afforded to participants. Failure to so abide may lead to our request that you leave the event immediately."
- When commissioning professional photographers or inviting the press to a Dressage Ireland Event, we will ensure they are clear about our expectations of them in relation to child protection.
- In advance of any event, such Professional photographers/film/video operators wishing to record an event
  or practice session must seek accreditation with the Dressage Ireland by producing their professional
  identification for the details to be recorded
- Dressage Ireland undertake the following in relation to any such professional photographers/film/video operators authorised to capture images at an event, Dressage Ireland will:
  - inform parents and children that a photographer/videographer will be in attendance ensure parents and children consent to both the taking and publication of films or photos
  - check the photographer's identity, the validity of their role, and the purpose and use of the images to be taken
  - o issue the photographer with identification, which must be worn at all times
  - o provide the photographer with a clear brief about what is considered appropriate in terms of image content and their behaviour clarify areas where all photography is prohibited (toilets, changing areas, first aid areas, and any other designated areas deemed appropriate at the material time:
  - o inform the photographer about how to identify and avoid taking images of children without the required parental consent for photography/video
  - o not allow unsupervised access to children or one-to-one photo sessions at events
  - o will not allow photo sessions away from the event for instance, at a young person's home
  - o clarify issues about ownership of and access to all images, and for how long they'll be retained and/or used in advance of their capture.

# General Use of Images

At many events, Dressage Ireland reserve the right to take wide-angle, more general images of the event, the site, opening and closing ceremonies, presentations and so on.

Dressage Ireland reserve the right to exercise an exemption from the requirement of consent in such circumstances on the basis that it is not reasonable, practical or proportionate to secure consent for every participating child in order to take such images, or to preclude such photography on the basis of the concerns of a small number of parents.

In these circumstances, organisers should make clear to all participants and parents that these kinds of images will be taken, and for what purposes.

# Use of CCTV In Facilities

Dressage Ireland reserve the right to utilise CCTV at any facility where an event is carried out. The presence of CCTV will be designated by signage at any such event. CCTV footage may be used by Dressage Ireland in the event of, but not exclusively restricted to, a complaint or investigation.

Dressage Ireland reserves the right to live video stream any of its event. In the event that such an option a exercised, notification of same will be prominently displayed at the event and on any correspondence in advance of the event, or on any ticket related to the event. In the event of a live streaming option being exercised Dressage Ireland will ensure:

- All attendees are made aware in the form of signage and advance notification
- Dressage Ireland live streaming will not include the recording of such images
- All footage shall be shown without sound to reduce potential identification of individuals
- Any cameras provide wide-angle, general views of the arena / facility
- there are arrangements in place to respond to any concerns about anyone watching the stream whose behaviour gives cause for concern

# Secure Storage of Images

Images or video recordings of children shall be kept securely by Dressage Ireland as follows:

- hard copies of images will be kept in a locked drawer
- electronic images will be in a protected folder with restricted access
- images will not be stored on unencrypted portable equipment such as laptops, memory sticks or mobile phones
- Dressage Ireland personnel will void using any personal equipment to take photos and recordings of children -will use only cameras or devices belonging to Dressage Ireland.