



Regulation 4.2 – Photography & Video Consent Policy

Effective date: June 2025

Acknowledgements

MUSC CIC would like to express our thanks to the following organisations who have assisted in the development of this policy

The NSPCC <https://learning.nspcc.org.uk/online-safety/photographing-filming-children>

POLICY STATEMENT

Mariners United Sporting Club CIC (MUSC CIC) recognises the value of photography and video in celebrating achievement, documenting participation, promoting activities and sharing positive experiences. MUSC CIC also acknowledges that inappropriate or poorly governed use of images and recordings can expose individuals to safeguarding risks, including misuse, misidentification and online harms such as grooming or exploitation. To ensure that photography, filming and video use is conducted safely, lawfully and transparently, MUSC CIC shall capture and use imagery only with appropriate consent and within clearly defined procedures that respect privacy and safeguard all participants.

Photographs and video recordings shall be managed in a way that mitigates the potential for misuse, ensures compliance with the UK General Data Protection Regulation (UK GDPR) and relevant data protection legislation, and upholds the dignity and rights of participants in all MUSC CIC activities. [OBJ]

1. INTERPRETATION

For the purposes of this regulation, photography and video include still images, video recordings, live streaming and any form of digital or electronic capture of people involved in MUSC CIC activities. Consent means the informed and freely given permission of an individual, or of a parent or legal guardian where appropriate, for imagery of that individual to be taken and used. Children are defined as individuals under the age of eighteen. Vulnerable adults are those who may require additional protection due to circumstances such as disability, health conditions or any situation of increased personal risk.

This regulation applies to all MUSC CIC directors, staff, volunteers, coaches, officials, contractors and any other individuals authorised to capture or use photographic or video content in connection with MUSC CIC activities.

2. SCOPE AND APPLICATION

This regulation applies to all MUSC CIC events, activities, competitions, training sessions, workshops, community programmes and promotional engagements. It applies regardless of whether imagery is captured using professional equipment, organisational devices, or personal devices when acting in an official MUSC CIC capacity. It also applies to imagery intended for use internally, in publications, on websites, via social media, in funding reports, in newsletters, in live streams and on any online or offline platforms.

This policy is intended to operate alongside MUSC CIC's Data Protection & GDPR Policy and Safeguarding Policy, with particular emphasis on preventing risks associated with the sharing, storage and use of images and video that involve children and young people. [OBJ]

3. CONSENT AND SAFEGUARDING REQUIREMENTS

MUSC CIC shall obtain appropriate consent before capturing, using or sharing identifiable photography or video recordings of individuals. Consent must be informed, specific and recorded in writing or digitally in a manner that can be retained for audit and governance purposes. Where children or young people are involved, consent shall be obtained from a parent or legal guardian before any images are taken or used, and the child or young person must also be consulted about the use of their image unless it is unreasonable to do so due to age or capacity. MUSC CIC shall explain how the image or video will be used, shared, stored and how long it will be kept.

In circumstances where images include children or young people aged 16–17, MUSC CIC shall consider whether parental consent is appropriate based on the context, and where

parental consent is not obtained, the organisation shall ensure that the individual is fully informed and comfortable with the use of their image. [Obj]

MUSC CIC acknowledges that photographs and video recordings constitute personal data. Individuals have the right to refuse or withdraw consent at any time, and MUSC CIC shall respect such decisions without prejudice. Where consent is withdrawn, MUSC CIC shall cease future use of the imagery and, where reasonably practicable, remove or securely delete existing copies.

MUSC CIC shall have clear processes to identify and manage images of individuals who have not provided consent. Where necessary, such individuals shall be distinguished through non-intrusive means (for example identifiable badges) to protect their wishes while avoiding isolation or stigma.

4. SAFEGUARDING RISKS AND RISK MITIGATION

MUSC CIC recognises that there are safeguarding risks associated with photography and video, including misuse of images, images appearing in public or online search results, and unauthorised sharing that could lead to a child being identified for harmful purposes. MUSC CIC shall take measures to mitigate risks, including ensuring imagery focuses on the activity rather than close-up personal identification, avoids accompanying personal details, and where online publication is involved, preserves privacy and data minimisation principles. [Obj]

MUSC CIC shall not capture or use imagery in situations where individuals are in states of undress, in changing rooms, medical areas or locations where privacy would reasonably be expected. Adults and volunteers capturing imagery must act professionally and always respect the dignity of participants. Unsanctioned or inappropriate photography, including by spectators, staff or volunteers using personal devices, is subject to prohibition unless controlled by MUSC CIC and covered by this policy.

5. USE, STORAGE AND SECURITY

MUSC CIC shall ensure that images and video recordings are stored securely, with access restricted to authorised persons. Electronic imagery shall be held in encrypted systems or secure servers consistent with UK GDPR and internal information security standards. Hard copy or printed imagery shall be stored in locked physical storage. Imagery shall only be retained for as long as necessary for the purpose for which it was obtained, after which it shall be securely deleted or destroyed.

The use of imagery in external publications, online platforms or third-party sharing shall be governed by consent permissions and organisational control. Naming individuals alongside images shall be avoided unless explicit consent has been obtained for that specific use. [Obj]

6. THIRD-PARTY CAPTURE AND MEDIA USE

Where external persons, media outlets, partners or contractors are permitted to capture images or video at MUSC CIC events, MUSC CIC shall ensure that clear conditions are established regarding consent, safeguarding, storage and use. Third parties shall comply with MUSC CIC policies and relevant legal requirements before capturing or using imagery that includes children, young people or vulnerable adults.

7. ONLINE SHARING AND LIVESTREAMING

When imagery is shared online, MUSC CIC shall take reasonable steps to communicate privacy expectations and platform settings to participants and guardians. Online imagery shall be shared via official organisational accounts with appropriate privacy controls

enabled. MUSC CIC shall discourage the public sharing of images on social media where identifiable participants are present without prior consent. Online livestreaming shall be managed with moderated access and protective measures to reduce anonymised or uncontrolled distribution of content. ⁽⁰⁰⁾

8. BREACHES AND COMPLIANCE

Any misuse, unauthorised use or inappropriate capture of photography or video that contravenes this policy shall be regarded as a serious breach of MUSC CIC safeguarding, data protection and conduct standards. MUSC CIC shall investigate breaches promptly in accordance with its safeguarding and data protection incident procedures and take corrective actions where necessary.

9. REVIEW AND MONITORING

This policy shall be reviewed at least annually by the MUSC CIC Board or sooner where required due to changes in legislation, safeguarding guidance or organisational activity. MUSC CIC may update this policy to reflect emerging risks associated with imagery, technology, online platforms and data protection requirements.

10. RELATED DOCUMENTS

This policy should be read in conjunction with MUSC CIC's Safeguarding Policy, Data Protection & GDPR Policy, Privacy Notice, Incident Reporting Procedures and Photography & Video Consent Forms.