Imagery Consent

A GUIDE FOR CLUBS

Photography, video and livestreaming are valuable ways to showcase Surf Life Saving **(SLS)**, celebrate the achievements of our members, and promote the great work of our clubs.This guide has been developed bringing together information and recommendations from Sport Integrity Australia **(SIA)** and Surf Life Saving Australia **(SLSA)** documents, including the Child Safe Policy, Member Protection Policy and Photography, Digital Recording & Images Policy.

This guide seeks to provide practical ways to help clubs manage photography, video and livestreaming in a way that respects members' privacy, supports individual consent choices, and promotes a safe environment for everyone.

Where members have concerns about imagery taken by independent photographers or members of the public, these will be managed in accordance with Privacy legislation and SLS policies.

DRAFT STATUS

This document is a consultation draft based on best practise recommendations. It is not an SLSA policy but a guide that clubs should adapt to their club and member needs.

Key Principles

- For simplicity, this document recommends two levels of imagery consent:
  - Consent to have imagery taken (e.g. be photographed), and
  - Consent to have imagery published (e.g. in the newsletter or on social media).
- Members can change their level of consent or 'opt out' of having their images taken and/or published at any time.
- Members do not need to provide any reason for withdrawing consent of imagery being taken and/or published.
- All reasonable measures will be taken to avoid capturing members who have requested not to have their image taken. Due to the nature of some events (particularly group activities or large gatherings) however, this may not always be possible. In these circumstances, the SLS entity will take reasonable steps to obscure or edit the member from any images before they are used or published.
- If a member is concerned that an image has been published without consent, they should contact the club for it to be removed.
- We are all human. In this rapidly evolving area of imagery and consent individuals and clubs will work together to support privacy requests, minimise errors and correct mistakes should they occur.

Definitions

Images / Imagery	All examples of when an image of a person could be captured. This includes all photos, video, livestreaming and webcam footage.
Consent	Permission given by a member (or parents/guardians on their behalf) to their Surf Life Saving Club/Branch/State/SLSA or affiliate or affiliate around images of themselves or their children (as defined above). For simplicity, this document recommends two levels of imagery consent: • Consent to have imagery taken (e.g. be photographed), and • Consent to have imagery published (e.g. in the newsletter or on social media).
Published	When an image is used in a form of communication or shared in any way. This could be in a club newsletter, on social media, or on a communication channel like Stack Team App.
Photographer	A person from a club who takes images at an event or during club activities. This could either be a volunteer or a paid employee.

Club Photography & Imagery Consent Statement

Our club is committed to protecting the privacy and safety of all members. Members can choose not to have their images taken or published and withdraw their consent at any time. Please contact the club to update your preferences.

Please be mindful that some members have not consented to images being taken or published – always check with a relevant club leader (Age Manager, Patrol Captain) before taking, sharing or publishing images.

Members are reminded to :

- Only take and share respectful, appropriate images of your own family, wherever possible;
- Photography or filming is strictly prohibited in or near bathrooms and changerooms;
- Do not name children, identify age groups, or share/publish images without consent.

If you wish to change your consent to having imagery taken or published, or if you have any concerns, please contact the club.

Image Sharing

Official club photos will be captured by our approved photographer and shared via *Platform Name* where you will be able to access photos. Our Club Photographer/s are *list names*.

Club Communication and Awareness

Club Website

- **Update Member Protection and Child Safe information** to communicate that members can withdraw consent or 'opt out' of having their images taken and/or published at any time. Provide information about who to contact or how to change consent e.g. an online form.

Member and Nippers Handbooks – Parent/Guardian Information

Update Member Protection and Child Safe information to include the following information. A sample is below.

- **Members can withdraw their consent** or 'opt out' of having their Images taken and/or published at any time. Provide information about who to contact or how to change consent e.g. an online form.
- A reminder to **only take respectful and appropriate images** of their own family members and do not take photos/video in or near the bathrooms or changerooms.
- A reminder to parents/guardians about **the privacy of members** in relation to images and social media sharing.
- Information on the **club photographer**, and how to identify them if relevant (e.g include a photo of them in communications).
- Confirm images **will be shared** via a closed communication channel.
- **Who to contact** if there are any concerns or challenges.
- **Share the Image Consent Dos and Don'ts** for members and parents/carers (e.g. do ask for consent, don't name people, age groups).

Image Consent Dos and Don'ts for Clubs

DO

- Confirm consent before taking or publishing any image.
- Use a closed communication platform (approved by the club) to share images.
- Ensure people are appropriately dressed, posed and reflect the spirit of Surf Life Saving – fun, teamwork, and safety in all images.
- Capture images in the presence of other people and in public club settings.
- Use a club photographer, camera or device wherever possible.
- Store images securely (e.g. a password protected online folder).
- Delete images when no longer needed or taken on a personal device.
- Identify someone in the club to be responsible for publishing Images.
- Share a small selection of high-resolution, positive Images publicly.

DON'T

- Assume consent from the SLSA membership form alone.
- Take images in or around change rooms, bathrooms, or private areas.
- Use personal devices to take or publish photos, if possible.
- Publish images or the full name of members on public platforms without consent.
- Publish the full name of children and young people in public posts (e.g. social media, newsletters).
- Forward or share images outside the club community or to unauthorised club members.
- Store images on a personal device.

Registration/Come and Try Day

- Display the **Image Consent Dos and Don'ts for members and families** for people to see during the registration process.

Weekend Nippers Communication

Provide information and verbal reminders to Nippers, parents/guardians during nippers including:

- **Parent/Guardian responsibilities** (e.g. taking, sharing, publishing and accessing images).
- **Respecting the voice of Children and Young People** (e.g. if they don't want their photo taken, they can speak up and be heard).
- Reminders about **who to contact** to talk about imagery consent within the club or if there are any concerns throughout season.

Information for Club Leaders – Age Managers/Coaches/Trainers/ Patrol Captains

Share key child safe information including;

- Overarching messages – why people can withdraw consent
- How to **support identification** of members who have opted out of their image being taken
- Information about club photographer/photo sharing/photo storage best practice
- Image Consent Dos and Don'ts for Clubs

Information for Children and Young People

Be sure to communicate to children and young people

- People should be asking before they take their photo
- Empower them to advocate for themselves and speak up if someone is taking their photo and they don't want them to
- Highlight who the person is who will be taking photos for the day / event (e.g. club photographer)

Supporting Members and Clubs

The following steps outline practical ways clubs can respect and support the privacy of members and/or families who choose not to have their images taken or published. Each situation is unique, so requests should be considered on an individual basis.

This information is a guide that clubs can adapt to suit their needs or situation. As always, if you are unsure, contact your Branch/State Office.

1. Create Club-Wide Awareness

- Build awareness of these principles within your club and let members know they can change their consent around imagery at any time.
- Share the 'Image Consent Dos and Don't for members and families' at Come and Try and Registration Days and display in your clubhouse.

2. Receive and Acknowledge

- **Thank** the member and/or parent/guardian for letting you know of their change to consent and confirm clearly.

> ***'We will respect this and take reasonable steps to prevent images being taken or published.'***

- **Note groups for this member** to determine communication needed, if any (e.g. U8 Nippers, Patrol 6, etc).
- **Record the request** in the Notes section of the Member Protection section of member's SurfGuard account.

3. Assign Responsibility and inform key people ONLY

- **Assign one point of contact** for the member (e.g. JAC, Registrar, Club Captain). This person is responsible for communication with the member/family and who the member will come to with any concerns.
- **Notify relevant leader** (e.g. MPIO, Age Manager, Club Photographer, Communication / Social Media volunteers) who can help meet the members' needs and consent choice.

> ***'This person does not consent to images being taken or published.'***

- **Keep it simple.** There is no need to share personal details or reasons for the request to support protecting members' privacy.
- **Check in** with the member and/or parent/guardian and confirm they are comfortable with the approach.

4. Practical Controls on the Ground

- **Brief any other relevant club leaders** (e.g. JAC and Age Manager / Patrol Captain) before the season starts or as a members' consent changes.
- **Simple identification** (if discussed with and agreed upon by the member and/or parent/guardian) members who have not given full imagery consent (e.g. coloured wristbands, specific brand or coloured rash vest, coloured peak cap) to assist identifying them.
- **Support photographers** by explaining who has not given full imagery consent. If possible, position the person away from group photos or discreetly identify them to avoid images being taken.

'We have a member who must not be photographed in this age group. Please check before any group photos are taken and/or published'

- Create a **no photo/no publishing list** of members, with restricted access, to minimise errors when publishing images.

5. Publishing and Sharing Imagery

- **Check against the** '**No Image List**' before publishing any images. **If unsure,** don't publish the image.
- **Share imagery on a controlled platform**. Ensure there is a person responsible for approving/removing members of these platforms each season.
- **Remove images promptly** if a mistake is identified and **communicate with club contact and member** clearly and as quickly as possible.

'We wanted to let you know that an image of you/[child's name] was published by mistake. We've now removed the image from all platforms and reviewed our processes. We're sorry for the error. Please feel free to contact us if you'd like to discuss this further.'

6. Storage of Imagery

- **Use a club camera/device** wherever possible.
- **Delete from any personal device** as soon as possible, if used to take imagery.
- **Store imagery safely** with limited access (e.g. Online server with limited access/password protected folders). Ensure there is a person responsible for controlling and updating this access as needed.

Images should not be taken on personal devices where possible

A club or organisation's photography equipment (e.g. camera) should be used to record all official images. Anyone undertaking photography involving children and young people must meet applicable state or territory legislation and the relevant SLS entity's child safety screening requirements..

If a club or organisation doesn't have photography equipment and a private device is used, you should implement a procedure to align with safe practices outlined above.

Resources and Supporting Documents









SLSA Policies and Resources

- Policy 6.02 - Privacy
- Policy 6.20 - Social Media
- Policy 6.05 - Member Protection
- Policy 6.21 - Photography, Digital Recording & Images
- Policy 6.04 - Child Safe

External Resources

Sport Integrity Australia
https://www.sportintegrity.gov.au/sites/default/files/SIA282-0224-SG%20Photography%20Filming%20Children%20Young%20People-A-5%20%5BDIGITAL%5D.pdf

Play by the Rules - Taking and Sharing Images in Sport
https://www.playbytherules.net.au/common-issues/taking-and-sharing-images-sport

Play by the Rules – Livestreaming in Sport – Common Issues
https://www.playbytherules.net.au/common-issues/livestreaming-community-sport?utm_source=aweber&utm_medium=email&utm_campaign=tips-on-safe-livestreaming

eSafety Commissioner
https://www.esafety.gov.au/communities/sport/resources

Sample Image Consent Withdrawal Form

A form can be completed to inform the club about imagery consent changes, however, it is not a requirement. This communication can be given to the club in many different ways.

This form is to be used for people not wanting their image taken or published whilst involved in Surf Life Saving			
Name of person completing form			
Name of person changing consent			
List the club/s, unit/s this person is involved with			
Level of consent		Consent to having imagery taken YES / NO Consent to having imagery published YES / NO	
Is this person a Nipper? (circle)		YES	NO
If yes, what is their age group?			
Does this person patrol? (circle)		YES	NO
If yes, what is the name of their patrol group?			
Member signature		Parent/Guardian signature (for U18 members)	
Date		Date	