

# SAFEGUARDING IMAGERY POLICY



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## Purpose

YMCA North (referred to throughout this document as “the Y” or “YMCA”) strives to and is committed to delivering a safe environment for all. Naturally we wish to capture and promote people’s achievements. We wish for members to have photographs and films of their special moments and for the Y to have imagery capturing our engagement with customers and communities. However, we also wish to acknowledge our safeguarding responsibilities and it is important to be aware of safeguarding and child protection aspects when imagery is being taken and used.

YMCA are aware of these potential risks and dangers and have put appropriate measures in place to help reduce the potential misuse of any imagery taken and/or used. YMCA’s Safeguarding Code of Conduct reflects and promotes sector standards; safeguarding best practice, upholds YMCA values and supports all involved.

## Application

This policy applies to all staff including employees, contractors and volunteers.

## Policy

Whilst also being a stand-alone policy document, this Safeguarding Imagery Policy, is a sub policy of YMCA’s Safeguarding Children and Young People Policy and interpretations should be in conjunction with this overarching policy.

## Risk factors

Some of the potential imagery risks include:

- Individuals may be identifiable when a photograph/video is shared with personal information e.g. this is X who lives at Y; X is a member of the Z programme and likes a certain music group.
- When photographs are shared on websites and in publications with personal information this permits direct and indirect risks to those individuals, particularly children/young people and vulnerable adults.

This information can make a child vulnerable to an individual who may wish to contact and start to “groom” that child for abuse – online (e.g. through websites or social networking) or through direct contact in the “real” world. Information placed on the internet has also been used by estranged parents (e.g. in adoption or family violence circumstances) to identify, trace and cause significant difficulties for children/young people and/or their parent/carer.

Photographs or recorded images of children may be inappropriate or be used or adapted for inappropriate use. There is evidence of inappropriate or adapted material finding its way onto sites showing child abuse images, and of inappropriate images being shared between groups of offenders.

## Categories of Abuse

YMCA recognises the noted definitions for all categories of abuse.

- Physical Abuse
- Family Violence
- Sexual Abuse, Grooming and Sexual Exploitation
- Protecting Children and Young People from Exposure to Inappropriate Material
- Emotional Abuse
- Bullying/Cyberbullying



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- Neglect
- Cumulative Harm

YMCA recognises indicators may be either physical, verbal, behavioural or a mixture of these.

### **Legislation and Guidance**

YMCA North's safeguarding policies and frameworks are compliant and reflective of our legislative requirements, sector licensing criteria, standards and other associated YMCA policies and procedures where applicable.

### **Appropriate Measures**

YMCA has safeguarding imagery and social networking/media guidance and aims to ensuring all involved with YMCA understand and support YMCA's safeguarding practice.

Helping children/young people, parents, staff (paid, volunteers and contractors) understand how imagery can be shared more safely.

Seeking written individual and parental consent for any identifying imagery, including where applicable obtaining the young person's permission to use their image.

Provide written expectations to any professional photographers invited to a YMCA event stating YMCA's expectations of them in relation to safeguarding and child protection.

Sharing acceptable use guidance with customers and stakeholders, which may include asking parents not to revise social media privacy settings and/or access imagery via YMCA platforms only.

### **Imagery**

At many events, YMCA and others will reasonably wish to take wide angle, more general photos of the event and activities. These types of images may be taken during, or at specific points in, the event. It is not reasonable, practical or proportionate to require parental consents for taking these general types of images, or to preclude it on the basis of the concerns of a small number of parents/carers.

Separate to this is the issue of consent for 'identifying' photographs/footage of individuals. Unless for the specific purpose of identifying a person (e.g. identity badges, etc.) YMCA will not be identifying individuals via imagery or imagery captions. However, imagery of individuals and/or that which clearly features an individual and/or child/young person (e.g. close ups, small group and team photos) would be considered as 'identifying' imagery. In these circumstances, YMCA will require consent from individuals and parental consent for those under 18 years.

### **Imagery at YMCA Programmes**

Unless an identified photography/videography event, project or session, YMCA operates a strict no imagery policy at all Centres for all services and activities. This is in accordance to help safeguard those who may become vulnerable should their image be taken, used and/or shared without their consent. To help YMCA and those children/young people and their families capture their achievements and engagements, at the Centre's discretion,

YMCA will offer imagery opportunities in accordance with safeguarding guidance. Opportunities may include:



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- Specific timeslots within and/or specific sessions supporting families capturing imagery. Those not wishing to engage will have advanced notice to ensure they have enough time to make alternative plans during these times/sessions.
- When timeslots are within a session, YMCA will aim for these to be towards the end of the session/programme or alternative activities may be provided for those individuals who are unable to participate in the scheduled imagery.
- Any presentation events will be managed under the coordination of a designated photographer (either YMCA staff or commissioned) and consent will be required from all individuals participating in imagery. YMCA will ensure families receive copies of any YMCA imagery and allow time at the end for families to take additional photos and action/equipment images.

### **Imagery at Events**

YMCA will either commission or delegate a staff member as the official photographer and issue them with identification, which must be worn at all times. Providing a clear brief about what is considered appropriate in terms of content and behaviour.

All attendees will be informed that a photographer will be in attendance and ensure they seek consent to both the taking and publication of imagery that features and clearly identifies them and/or their child(ren) (e.g. close ups, small group and team photos). It is not reasonable, practical or proportionate to require individual and/or parental consent for taking general types of images (e.g. take wide angle, more general photos of the event and activities), or to preclude it on the basis of the concerns of a small number of parents.

All attendees will be informed either via advanced notice, signage and/or both that imagery may be taken and who to contact should they have any concerns. Concerns regarding inappropriate or intrusive imagery should be reported to a Manager and/or YMCA Safeguarding Manager and recorded in the same manner as any other safeguarding concern.

### **Public Information**

The specific requirements concerning imagery and imagery equipment registration (if applicable) should be displayed prominently in event programmes and announced over the public address system, prior to the start of the event and if applicable, at regular intervals during the event.

### **Guidelines for Use of Photographic Filming Equipment by attendees at YMCA Events**

YMCA will aim to ensure all attendees are aware of YMCA expectations surrounding imagery.

- Attendees are requested to ensure imagery captured relates only to their child(ren) and/or family members.
- Consideration to acceptable use of imagery, including not sharing images capturing other children and ensuring privacy settings on sharing platforms (e.g. social media) are set.
- If applicable, spectators wishing to use imagery equipment may be asked to register at an event. Event organisers will then provide some indication (e.g. a sticker for each registered camera, or badge to be displayed by the spectator) to help others recognise those who have registered, and respond to those who do not appear to have registered.

### **Identifying Imagery Requirements**

- YMCA will require written consent from all individuals and parental consent for those under 18 years.
- YMCA will only use imagery that is considered suitable and appropriately represents individuals and YMCA. When assessing use of imagery potential risks, the most important factor considered is the



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potential for inappropriate use of that image. Some activities, for example swimming and gymnastics, present a much greater risk of potential misuse.

- Not using identifying information in imagery captions.
- No unsupervised access to children/young people
- Imagery only being undertaken at YMCA events and/or settings.

### Seeking Consent

Individuals (including children/young people) should always be consulted about the use of their image. This ensures they are aware that the image is taking place and understand the purpose, possible use and maximum timescales for use and storage. For those under 18 years written parental consent is required.

### Imagery Risks

An imagery risk is that imagery may be inappropriate, or be used or adapted for inappropriate use. There is evidence of inappropriate or adapted material finding its way onto sites showing child abuse images, and of inappropriate images being shared between groups of offenders. Therefore safeguarding considerations will be required across all imagery content ensuring:

- All imagery and imagery use is in accordance with safeguarding procedures and purposes outlined within consent forms.
- Does not capture any person(s) for whom consent has not been obtained.
- Alignment of content (e.g. imagery and imagery captions) does not create and/or allow for the identification of any individual. This includes names, addresses or any other unnecessary information, which could be used to trace the child. This information is also withheld in all reproductions. Where necessary fake names, ages, etc. may be used to help protect the identities of those individuals captured.
- As much as possible content reflects safeguarding messages creating visible barriers for those wishing to use information for negative purposes e.g. a staff presence, background signage, etc.
- Ideally children/young people are captured in groups and reflect a YMCA staff presence.
- Content does not create safeguarding concerns either for YMCA and/or our stakeholders, particularly where joint branding is being represented.
- Imagery should positively reflect children/young people's involvement (e.g. smiling/happy).
- Imagery focuses on the activity, rather than a full body and/or out of context shot e.g. child in swimwear but not swimming.
- Images used in publicity material both printed and digital, will use techniques such as 'watermarking', Y branding or other secure structures to help prevent copying and/or inappropriate use of the image.

### Attire

Some sporting activities have a higher risk for potential misuse of imagery than others, such as swimming, gymnastics and athletics. Therefore YMCA requires:

- Children/young people imagery to reflect appropriate dress e.g. a t-shirt and shorts/skirt, etc.
- Where applicable imagery captures all safety gear e.g. lifejackets, helmets and other safety equipment. This represents best practice but also assists in reducing the risk of inappropriate use.

### Storing Images

Digital and/or hard copies of any images or video of individuals must be kept securely. Hard copies of images should be kept in a locked drawer and electronic images should be in a protected folder with restricted



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appropriate staff access only. Images should not be stored permanently on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

YMCA staff are only to use imagery equipment belonging to YMCA. No imagery of YMCA customers is to be taken on personal devices.

When storing and using photographs to identify children and adults for official purposes, such as identity cards, YMCA will ensure compliance with the legal requirements for handling personal information under the New Zealand Privacy Act 2020.

Overall storage and management of imagery including identified consent record processes is to be managed, overseen and coordinated by YMCA Marketing, in conjunction with all YMCA Centres, Services and Programmes.

### **Working with Partner Agencies**

Where YMCA settings are on shared premises (e.g. school sites) and/or have other professionals/agencies/organisations renting YMCA space (e.g. Private Physiotherapists, Community organisations/non-government organisations, etc.); YMCA will certify partner agencies are aware of our imagery requirements.

In informing partner agencies of imagery events YMCA will name a key contact should partner agencies have any areas they wish to discuss further. Communication should clearly state imagery relates to YMCA settings and/or programmes only and include details such as date, times, specific areas (if applicable).

### **Commissioning/Contracting Non-YMCA Imagery Services**

YMCA acknowledges for all events involving commissioned and/or contracted imagery services, YMCA is required to ensure all partners are fully aware of and confirm their agreement to abide by YMCA's safeguarding requirements. This process is to be completed prior to any imagery being taken.

### **YMCA Responsibilities**

- YMCA staff member must remain with the Commissioned/Contracted provider at all times.
- Arrange identification for all external imagery staff.
- Ensure the commissioned service as designated YMCA support at each event, who is also fully aware of safeguarding requirements and processes.
- Ensure for each event has a clear process for aligning consent forms with imagery captured during events.
- For any imagery events, signage should clearly inform all attendees that imagery is occurring on site and who to talk to should have any concerns.
- Centre Staff must ensure all project staff are signed in/out.
- There is to be no imagery taken or arranged to be taken by YMCA and/or the commissioned/contracted provider that is outside of the identified event(s), on a one-to-one basis and/or within a non-YMCA environment e.g. individual's home.
- Certify YMCA ownership of all imagery and agreed partner use (if applicable). A brief statement to clarify the reason for this document. Contains reference to any other directly related documents such as supporting procedures and/or associated guidelines.

### **Policy amendments**

YMCA is entitled to amend and vary this policy from time to time at YMCA's sole discretion and all employees are required to observe such amended policy.



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<b>Creation date:</b> Apr 2017	<b>Date reviewed:</b> Dec 2022	<b>Next review date:</b> Feb 2024 <i>Note – the default frequency is every 2 years unless otherwise required</i>
<b>Owner:</b> Safeguarding	<b>Approved by:</b> Julian Baldey, CEO and Chair of Safeguarding Governance Group   <b>Signed:</b>  <b>Date:</b> December 2022	
<b>Document control:</b> Original signed document is approved. No unauthorised copies. Reviews of this policy will include input from the Safeguarding Governance Group		

### Tracking changes

	<b>Reviewed by who and when</b>	<b>What was changed</b>	<b>Version #</b>
<b>Written:</b>	Safeguarding, Apr 2017	Policy created	1
<b>Amendments:</b>	Safeguarding, Dec 2018	Initial feedback from business unit incorporated into Policy	2
	Safeguarding, Dec 2020	ACF reaccreditation Document reviewed against the new ACF standards	3
	Safeguarding Manager, Dec 2022	Biennial review, along with amendments to reflect new branding	4