

# Basingstoke Bluefins Publicity Policy

This policy applies for all members of Basingstoke Bluefins and includes all forms of publicity including but not limited to Basingstoke Bluefins website, press reports and social media. Basingstoke Bluefins will from time to time promote the success of the Club in some or all media formats, whether this is the Club's success in the sporting arena, the clubs achievements, or individual exceptional performances.

This policy has been written to safeguard all our members but in particular the welfare of our young swimmers and vulnerable adults.

The Club's Publicity Policy has been aligned with that of the ASA Wavepower 2016-19 in association with the NSPCC and other governing bodies. For further details please refer to the ASA and NSPCC websites.

Basingstoke Bluefins, in common with other clubs, needs and welcomes positive publicity. Swimmer's photographs add colour, life and interest to materials and articles promoting club activities and initiatives. This can increase swimmer motivation, staff morale and help parents and the local community identify and celebrate the Club's achievements.

However, in order to respect young people's and parents' rights of privacy and because of potential child protection issues, photographs must be used in a responsible way. Basingstoke Bluefins is committed to safeguarding and promoting the welfare of children and young people and expects staff and volunteers to share in this commitment.

## Data Protection Act

Under the terms of the Data Protection Act 1998 images of swimmers must not be displayed in a public place without consent. This includes the Club website, notice board, Facebook Page and any publication where members of the public have access.

## General rules on using photographs of swimmers

- Parental consent must be obtained
- Ensure that swimmers cannot be individually identified
- Focus on the activity rather than swimmer.
- Use groups of swimmers not individuals.
- Ensure all those featured are appropriately dressed – fully clothed, above the waist or in the water (above the water) shots.
- Represent the broad range of youngsters participating in swimming - boys and girls, swimmers with disabilities, members of minority ethnic communities.
- Any swimmer subject to a court order, who has advised the club, will never have their image used in publicity
- We will ensure images are stored securely and used only by those authorised to do so
- Ensure file names given to electronic images of swimmers do not identify the swimmer eg maryjones.jpg

## Newspapers

- As long as parental consent has been secured, newspapers may publish group photographs of swimmers but must not identify individuals by publishing names alongside. Refer to group photographs collectively eg A squad, merit award winners. (Group shots are defined for BBFS publicity purposes as more than 10 people) Articles which accompany group photos may contain swimmers names if naming them does not identify individuals.

## Video & Filming

Basingstoke Bluefins Publicity, Photography and Social Media Policy 2016

Updated: Sept 2016

Review by: June 2017

- The appropriateness of photographic images earlier outlined also applies to video/film images
- We recognise that parents, carers and family members wish to record swimming and other events to celebrate their swimmers achievements. However it is important that such records remain private and for their own personal use

### Commercial & Outside Photographers

- Will be given a clear brief about what is considered appropriate in terms of content and behaviour
- Wear identification at all times
- Will not have unsupervised access to children or one-to-one photo sessions at events
- Will not solicit photo sessions outside the event

### Exceptional Circumstances

- From time to time there may be exceptional occasions where the Club will wish to use identifiable photos (eg. National Qualifiers) and use the swimmers full names in an article accompanied by a photograph for the local media. On these occasions the Chairman, in consultation with the Publicity Officer, will make the decision whether to seek the specific consent of parents and their swimmers for use of their images and full names for this specific report. Please see attached consent forms – Publicity 1a.

#### Summary – Identification of Swimmers in BBFS Publicity material

**Identification of a swimmer** – the ability, by any reasonable person, other than members of Bluefins and the swimmers immediate family and friends, to recognise an individual swimmer by information gleaned from a BBFS publicity report

#### Part names must be used if:

The nature of the report could facilitate the identification of an individual swimmer  
Captions for group photos (defined as containing more than 10 people)

#### Full Names may be used if:

Individual swimmers cannot reasonably be identified  
Swimmers are over 18yrs old and not considered a vulnerable adult  
Articles accompanying group photos, if names do not individually identify swimmers.  
Exceptional circumstances, ie National swimmers, only with Chairman's consent

**No names must be used if:** (Any report that falls into this category must be rewritten by the Publicity Officer to comply with either of the above)

Individual photographs or photos with less than 10 people are to be used  
Individual swimmers can be identified due to the information contained in the report

- All of the above requires parental consent. Consent may be withdrawn at any time on written notification to the Publicity Officer. Parents and swimmers will be asked to consent (or not) to the use of their swimmers names or images for the explicit purpose stated.
- All formal written consents (and non-consent) will be held on record by the officer in charge of the specific event in Dropbox for a minimum of six months from the date of the consent form.

- All reports whether it to go to the press or on the Club's website or in any other media format must be passed to the Club's Publicity Officer and Chairman for approval. The Publicity Officer will seek clarification if necessary on any safeguarding issues directly with the Welfare Officer or ASA whichever is appropriate.
- The Publicity Officer will be the sole conduit of publicity information to go out in any media format. Under no circumstances must any member of the club send out publicity information themselves.
- The Club's Publicity Officer will attend Safeguarding Training
- Videoing or taking photos during a training session is strictly prohibited. The only exception to this rule is when a coach uses video footage of your child in a controlled environment for means of instructing stroke technique
- All publicity mediums which involve the Club or its members will be monitored by the Club Officials and Welfare Officer on an ongoing basis. Any infringement will be identified and rectified at the earliest possible opportunity and referred to the Welfare Officer/ Officers of the Club as a breach of the Club's Safeguarding Policy with appropriate action being taken.
- The main purpose of any publicity materials is to promote the Club. Standard wording to be included with all publicity material at a minimum should be:

Basingstoke Bluefins is a multi-disciplined club with over 900 members in the Basingstoke & Deane area, and further afield. The club has dedicated programmes for swimming lessons, competitions, waterpolo, disability and adults. For more information or to make an enquiry, please visit our website: [www.bbfsc.org](http://www.bbfsc.org)

- Any postings on the Clubs Facebook page should only provide the links to reports to be found on the clubs website or in the local media. All other information must be general club publicity and not specific to any identifiable individual(s). When adding links to media reports it is the responsibility of the Publicity Officer to ensure that the report remains compliant with this publicity policy.

## **Consent form for Children, Young Swimmers and Vulnerable Adults for the use of photographs/names for a specific event**

Basingstoke Bluefins recognises the need to ensure the welfare and safety of all its young swimmers. In accordance with Basingstoke Bluefins Publicity Policy, ASA Wavepower 2016-19 and NSPCC guidelines, photographs will not be taken of young swimmers nor names used in any media without the specific consent of the parents or carer and swimmer.

### **Legal requirement**

In order to comply with the Data Protection Act 1998 a lawful basis is required before capturing images of a child or young person. Obtaining consent from either the parent, guardian or legally appointed representative of the child or young person provides that lawful basis.

ie:

***I do / I do not\*\*** give consent for image capturing, of my swimmer for the publicity reports for this specific event.*

### **Safeguarding**

As part of our commitment to safeguarding, consent is also required separately to name young people in material used in the media. As previously stated no swimmer will be named if any photograph containing their image is published. ie.

***I do/I do not\*\*** give consent for my swimmer to be named in an article regarding this event.*

NB Swimmers will not be named in any article if in doing so they may be individually identified.

By the signing of this form, which will usually be found as part of the meet entry form, it is assumed that both parental AND SWIMMER consent is confirmed. Please ensure that your young swimmer is happy for publicity to be granted on their behalf. Basingstoke Bluefins will take all steps to ensure these images are used solely for the purposes they are intended. If you become aware that these images are being used inappropriately contact the Club's Welfare Officer to report these concerns. **Parents/Carers/Swimmers have the right to withdraw consent at any time on written instruction to the Club's Publicity Officer.**

## Publicity 1a

### Consent form for Children, Young Swimmers and Vulnerable Adults

#### Consent form for the use of photographs and full names for a specific special event/occasion

Basingstoke Bluefins recognises the need to ensure the welfare and safety of all its young swimmers.

In accordance with Basingstoke Bluefins Publicity Policy, ASA Wavepower 2016-19 and NSPCC guidelines, photographs of young swimmers will not be taken without the consent of the parents or carer and swimmer. From time to time however there may be occasions when the Club will wish to celebrate a specific outstanding event or occasion and it may be appropriate for an article or report to be published in which a swimmer will be identifiable.

#### Legal requirement

In order to comply with the Data Protection Act 1998 a lawful basis is required before capturing images of a child or young person. Obtaining consent from either the parent, guardian or legally appointed representative of the child or young person provides that lawful basis. ie

*I confirm that I have read the Club's Publicity Policy and associated risk assessment, and understand and accept the possible risks to my young swimmer in being identified in this way in the media.*

***I do/I do not** give consent for my swimmer to be identified in an article specifically and only for this (named) event. I understand that this may be by use of my swimmers full name, or identifiable photograph or both.*

By signing this form it is assumed that both parental AND SWIMMER consent is confirmed. Please ensure that your young swimmer is happy for publicity to be granted on their behalf. Basingstoke Bluefins will take all steps to ensure these images are used solely for the purposes they are intended. If you become aware that these images are being used inappropriately contact the Club's Welfare Officer to report these concerns.

This consent for names and photos is for the specific event/occasion detailed and will not be used for any other purpose or on any other occasion.

## **Basingstoke Bluefins Publicity Policy and the use of Social Media Advice for Swimmers & Parents**

The Club's Publicity Policy has been aligned with that of the ASA Wavepower 2016-9 in association with the NSPCC and other governing bodies.

We would therefore like to remind all Parents and Swimmers:

- Never share pictures of yourself or your friends that might reach other people that you do not wish to see them.
- Never post or send any photographs, videos or make comments that may be hurtful, untrue and upsetting and you may regret sharing later on used by other people in a way you did not intend or want.
- Do not put pictures/video footage of other Club members on any site within the Club setting, as you may breach the ASA Photography Guidance. This extends to children (your child or otherwise) in a swimming costume, in the water, poolside or in the changing area.
- Videoing or taking photos during a training session is strictly prohibited. The only exception to this rule is when a coach uses video footage of your child in a controlled environment for means of instructing stroke technique.
- Ensure that the privacy settings on your swimmer's social media accounts are set to the appropriate level. Please be aware that even the highest privacy settings on Facebook will still allow a stranger to send a private message you or your swimmer on your/their personal Facebook page.

Always be aware that social networking sites are a method of communication like letter writing and the spoken word. They are bound by the same laws and rules. Such technology is instant and this allows you as the user to react in the 'heat of the moment', where in the past you would have been required to write a letter, which would have taken time and allowed for you to think again before sending. So never place a comment on the internet that you would not put in writing or say to the individual concerned face to face as to do so may not only breach ASA Policy but also the law.

### **Guidance to parents of ASA members under the age of 18**

There have been occasions where parents of ASA members have used social networking sites to criticise or verbally abuse swimming Clubs, its officers, officials, coaches, teachers, and swimmers in an inappropriate and unacceptable manner. This has in some cases led the person who is subject of the verbal abuse to take action through statutory agencies or statutory legislation to address the comments made.

The ASA have produced a parent's code of conduct, which all Bluefins Parents have signed and are bound by. Parents are expected to: "Behave responsibly as a spectator at training and treat swimmers, coaches, committee members and parents of yours and other Clubs with due respect meeting the ASA commitment to equality".

### **Consequences of Actions**

Parents should be aware that posting messages, photos, comments on any social networking site that breaches the above requirement in an ASA Club are in violation of Parents Code of Conduct.

Any individual found to be in violation of this Policy, may face disciplinary action in accordance with the Club's Disciplinary, Grievance and Complaints Procedures.

In addition Basingstoke Bluefins will ensure at all times that the necessary measures are taken to Safeguard children and young vulnerable adults.

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## Risk Assessment for the use of swimmers names/photographs for publicity

Risk		Risk Level
<b>General Risks</b>		
Young swimmers may be identifiable and therefore vulnerable to contact from third parties	MEDIUM	Photographs only or part names only on an event by event basis
		Parental consent required for permission to use images OR names in media
		Club's publicity policy to be published on website
		Publicity Officer to attend safeguarding training
		Any photographs must only be retained for use for a specific event and thereafter destroyed
<b>Social Media Risks</b>		
Instant form of communication may generate hasty and inappropriate responses.  Use of personal social media accounts for inappropriate comments	LOW	
		Parents to receive copy of the Club's publicity policy.
		Club's policy on social media to be pinned to the Club's Facebook page to remind all users of appropriate use of this media
		Any persistent offenders will be approached in the first instance by the Welfare Officer to advise of more appropriate use of media. If behaviour persists this may result in disciplinary action and the Club's code of conduct will be applied.
		Ensure that communication to parents <u>always</u> includes emails and do not rely on information on Facebook reaching all members
		Policy to highlight to parents that even the highest privacy settings will still allow strangers to private message individuals.
<b>Press Risks</b>		

Outstanding success (ie name and photo consent) by individuals may result in the swimmer being identified (national swimmers for example)	HIGH	Seek specific parental permission for specific events. Ensure all risks are highlighted to parents/carers.  Where appropriate swimmers first name OR last name OR Initials only should be used alongside their image.
Individuals may send reports directly to the press	MEDIUM	Ensure that this policy is widely distributed and add specific clause to say any reports on activities by Bluefins swimmers MUST go via the Press Officer
Press may publish reports and photos sent directly to them by individuals rather than only accepting publicity information from the Club's Publicity Officer	LOW	Advise local newspaper contact that only information through the Bluefins Press Officer is acceptable to be published.
<b>Website Risks</b>		
Archived reports/photos and articles may no longer have parental permission	LOW	Photographs or footage of individual swimmers will only be kept on the website for a period deemed reasonable by the Press Officer to promote a specific club activity. Website Manager to and remove any out of date material.
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