



WelshBoxing

BocsioCymru

Photo and Image Consent Policy

Welsh Boxing's positive impact on communities can be powerfully captured in photos and film, while image recording is vital for athletes to develop good boxing techniques. GDPR requires us to follow a few simple rules to ensure we're using their images safely.

What does GDPR require us to do regarding photos?

GDPR defines images of individuals as Personally Identifiable Information (PII), and as such, we have to follow a few rules.

When photo shoots or filming involve individuals whose faces are recognizable, it is essential to ensure you **have the explicit written consent of all those featured**. The best way to achieve this is via a signed image consent form.

Why do we need to consent for photos?

The General Data Protection Regulation (GDPR) protects the rights of privacy rights of individuals, and there are three Articles of the legislation that are of relevance:

The right to be informed (articles 13 and 14): We must be clear about the context of how the images are being used and tell people ahead of getting their consent.

The right to access (article 15): Individuals have the right to access their images on request and receive confirmation regarding how these are being used.

The right to erasure (article 17): Individuals have the right to request photos be removed from websites, social media or future versions of printed materials.

Recording Consent

It's important that we always record consent for an image and ensure that consent is saved for archiving.

To help, we've produced:

- an Adult Photo Consent Form for over 16's (Annex 1)
- an Under-16's Photo Consent form (Annex 2)

Getting Consent

If you are taking photographs at an event, you'll need to ensure that people whose images are being recorded have completed a Consent Form. Annex 1 contains a photo consent form for over 16 year olds.

If you're running an event, it's advisable to have these forms at the point of registration or have obtained consent at the time of booking if booking processes allow it.

You may wish to have these forms available for athletes during training session, ensuring you have one form for every new starter.

Children

If your photos feature children under the age of 16, written parental consent must be given (consent form). For group shots the verbal permission of parents / school may be sufficient. However, elements that may identify an individual child such as a school badge should be avoided to ensure safety.

You can find the Consent form for Children in Annex 2.

Identifying those who do not give consent

Depending on the type of event, you might find it useful to issue people who have not given consent to be photographed or filmed easily identifiable badges and advise all Welsh Boxing staff that they should not record those with the badges. Alternatively, in settings where the majority of people have declined permission, it's advisable to not take images at all.

Images and Social Media

The GDPR broadens the definition of user data to include photos, social media profiles and other ways of identifying individuals including system sign-in nicknames that could be linked to that individual. That means we have to be particularly sensitive to images that we post to social media including Facebook and Twitter. You shouldn't post images to social media unless you are absolutely clear you have written permission to do so.

Storing Consent

To make sure we can audit, remove images once they 'expire' and respond to requests to have images removed, we use a central record of consents. We've produced a excel Spreadsheet that should be completed for each image recording:

- Title of image
- Brief description
- Who took the image and where it was taken
- Where image should be stored (this should be the central image bank)
- Where the consent(s) can be found – this should include the image title in the consent file name. If the image has multiple people in in, please ensure everyone has completed consent and name/store each separate consent.

Image Naming

When saving an image, you should name it as follows:

Project name then date taken as DD MM YEAR, underscore and then a unique sequential number

Examples:

Shawtrust12042018_3

Cornwall111062017_12

Importantly, once consent has been given, Welsh Boxing needs to store those consents. Each consent should be scanned or photographed and then stored electronically in a new central secure cloud folder in the Welsh Boxing SharePoint photo library

Finally, once the Consent has been uploaded to the folder and checked for successful upload, the paper consent form should be securely destroyed.

The Right to Erasure

Anybody has the right to request Welsh Boxing removes their images by withdrawing consent. To do this, they need to contact the Chief Executive who will treat the request as a Subject Access Request under our Data Protection Policy.

If you are contacted by anyone with a request to stop using their image, please pass on to the Chief Executive.

Welsh Boxing will delete images containing that person (even where they appear with others), but existing materials that have been published may reasonably be continued to circulate if consent was in place at the time of production – for example, printed annual reports, or pictures already posted to social media and outside of Welsh Boxing's control.

Third Party Images

This policy only covers images taken and used by Welsh Boxing. Images taken and distributed by third parties, such as other participants at events and then shared using their own social media channels fall outside of our responsibility.

Wherever third-party images are used, we have a responsibility to ensure we have permission to use the images through license or contract – for example, when using Shutterstock or other online image library.

Using Existing Images of Children

To ensure that we reduce risk to vulnerable individuals, Welsh Boxing should no longer use images of children (under 16s) we hold that we can't establish if consent has been recorded and destroy the images unless we have explicit and recorded consent on file.

Annex 1: Adult Consent Form

Welsh Boxing Over 16's Photographic/ video consent form

We would be grateful if you would fill in this form to give us permission to record and use your image in our printed and online publicity and to support your athletic performance.

Who are we?

We are Welsh Boxing and we promote boxing at all levels across Wales. Our registered address is Welsh Boxing, National Sport Centre, Sophia Gardens, Cardiff, CF11 9SW

How will your image be used?

We may use your image:

- to promote boxing, physical activity and wellbeing on our website, online and downloadable resources
- to share on social media, including Twitter and Facebook
- in printed materials such as newsletters, annual reports and marketing materials.
- to assist in your boxing performance by using image capture apps & services to improve your performance

How long will we keep your image?

We'll keep your image for 5 years after the end of the time we engage with you before destroying any copies we hold. The image may continue to be found online or printed materials as these are outside of our control.

Removing your images from our records

You can contact us to change your permission at any time by writing the Chief Executive at Welsh Boxing, National Sport Centre, Sophia Gardens, Cardiff, CF11 9SW.

Giving us your permission

Please tick the boxes below

I give Sport Wales permission to take my photograph and/or video for the purposes of sport promotion and performance

I grant full rights to use the images resulting from the photography/video filming, and any reproductions or adaptations of the images for fundraising, publicity or other purposes to help achieve Sport Wales aims. This might include (but is not limited to), the right to use them in Sport Wales printed and online publicity, social media, press releases and funding applications.

Name	
Signature	
Email	
Date	

For Welsh Boxing Use	
Event/Officer	
Image ID	

Annex 2: Children's Consent Form

Welsh Boxing Under 16's Photographic/ video consent form

We would be grateful if you would fill in this form to give us permission to record and use your child's image in our printed and online publicity, and to support their athletic performance.

Who are we?

We are Welsh Boxing and we promote boxing at all levels across Wales. Our registered address is Welsh Boxing, National Sport Centre, Sophia Gardens, Cardiff, CF11 9SW

How will your image be used?

We may use your child's image:

- to promote boxing, physical activity and wellbeing on our website, online and downloadable resources
- to share on social media, including Twitter and Facebook
- in printed materials such as newsletters, annual reports and marketing materials.
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Name of child	
Name of parent / guardian	
Signature of parent / guardian	
Date	

For Welsh Boxing Use	
Event/Officer	
Image ID	