



GUIDANCE NOTES NO:

**8.3**

# PHOTOGRAPHING AND FILMING CHILDREN

**FOR ALL**



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# PHOTOGRAPHING AND FILMING CHILDREN

*The FA recognises the use of photos and film on websites, social media, posters, within the press or other publications, can pose direct and indirect risks to children if they are not managed appropriately. However, the taking of appropriate photographs and/or filming of children is supported by The FA.*

*Everyone wishing to film or take photos in football has a responsibility to familiarise themselves with and adhere to the following guidance.*

*Parents, children and football clubs generally look forward to celebrating and/or publicising footballing successes by photographing children at matches and events. Documenting a child's involvement and progress through the season both by film and photos is widely accepted as contributing to the enjoyment of the game. It's also recognised some coaches find it helpful to use film as a coaching tool to support a player's development.*



# POTENTIAL RISKS

## INAPPROPRIATE TAKING AND OR USE OF PHOTOGRAPHS OR FILMING OF CHILDREN

Individuals may set out to take inappropriate photos or film content in ways that are potentially illegal and/or harmful, such as:

- Children changing;
- Photos taken in the toilets;
- Using a camera at ground level to photograph under a person's clothing;
- Photos and film footage that appear ambiguous can be used inappropriately and out of context by others;
- Photos and film footage that can easily be copied and edited, perhaps to create child-abuse images or film footage;
- Photos and film footage shared privately online that can be re-shared, possibly entering the public domain on websites or social media (further information on this is available in 'Section 6: Safeguarding in the Digital World' of the safeguarding section on TheFA.com);
- The sharing and re-sharing of Photographs/video of people being abused or experiencing harm may be re-traumatising for victims and their families.

## THE IDENTIFICATION OF, CONTACT WITH, OR GROOMING OF A CHILD

When a child's photo or film of that child is accompanied by significant personal information e.g. full name, address - it makes them more easily identifiable to third parties. This can lead, and has led, to children being located, contacted and/or 'groomed'. Even if personal details are kept confidential, details identifying the school or club, or their favourite sportsperson or team, can potentially be used to groom the child.

There's an increased risk of identification of, and contact with a child:

- Where a child is in local authority care or placed adoptive parents;
- Where there are known legal/court restrictions on contact with one parent following a parental separation exists, e.g. in domestic violence cases;
- In situations where a child may be a witness in criminal proceedings.





# COMMISSIONING OFFICIAL OR PROFESSIONAL PHOTOGRAPHERS\* AND THE LOCAL MEDIA

If you are commissioning professional photographers\* or inviting the media to cover a football activity, ensure you and they are clear about each other's expectations.

The key is to plan ahead and communicate early on. Please follow the steps below:

- Provide a clear brief about what is considered appropriate in terms of content and behaviour;
- Inform them of your club's commitment to safeguarding children;
- Establish who will hold the film and/or photographs and for how long they'll be retained and/or used and what they intend to do with them, e.g. place on a website for sale, distribute thumbnails to the club to co-ordinate sales;
- Issue the professional photographer\* with identification, which must be worn at all times;
- Clarify areas where all photography\* is prohibited e.g. toilets, changing areas, first-aid areas etc;
- Inform the photographer\* about how to identify – and avoid the taking of photographs and/or filming – children without the required parental consent;
- Don't allow unsupervised access to children or one-to-one photo or filming sessions at events;
- Don't allow photo or filming sessions away from the event – for instance, at a young person's home;
- Inform participants and parents/carers prior to the event that a professional photographer\* will be in attendance.

\*Including filming



# WHAT TO DO WHEN PARENTAL CONSENT IS NOT GIVEN

Clubs and event organisers have a responsibility to put in place arrangements to ensure that any official or professional photographer\* can identify (or be informed about) which children should not be subject to close-up photography or filming.

This could involve providing some type of recognisable badge, sticker or wristband, and/or a system for photographers\* to check with the activity organiser and/or team manager to ensure it's clear which groups or individuals should not feature in photographs or on film.

Note: Using digital editing tools may allow images to be blurred and therefore images be taken and edited to remove individuals who have not consented before being hosted/ shared via a League/club's official Website/ Social Media.

\*Including filming





# COMMON SENSE CONSIDERATIONS TO ENSURE EVERYONE'S SAFETY

It's important to remember the majority of photographs and film taken are appropriate and taken in good faith. If we take the following measures we can help to ensure the safety of children in football.

## DO:

1. Share The FA's guidance on taking photos and filming with everyone who becomes a club member (officials, parents/carers);
2. Ensure the club has written parental consent to use a player's photo and/or film footage in the public domain e.g. on the club website, Facebook page or in a newspaper article. This is essential in relation to point 3 below;
3. Ensure that any child in your club who is under care proceedings where there are legal restrictions, is protected by ensuring their image is not placed in the public domain. This can be done by using The FA's [Club Annual Membership Information and Consent Form](#). See [Guidance Notes 8.2](#) for this form;
4. Ensure all those featured are appropriately dressed (a minimum of vest or shirt and shorts);

5. Aim to take pictures which represent the broad range of youngsters participating safely in football e.g. boys and girls, disabled people, ethnic minority communities;
6. Advise parents/carers and spectators that there can be negative consequences to sharing photos or film footage linked to information about their own or other people's children on social media (Facebook, X (formerly Twitter) Instagram YouTube, etc.) – and that care should be taken about 'tagging'.

## DON'T:

1. Publish photographs or film with name(s) of the individual(s) featured unless you have written consent to do so and you have informed the parents/carers as to how the photo will be used;
2. Use player profiles with pictures and detailed personal information online;
3. Use an image/film for something other than that which it was initially agreed, e.g. published in local press when initially produced for a clubhouse commemorative picture;

4. Allow photos or film footage to be taken in changing rooms, showers or toilets – this includes the use of mobile phones that record images;
5. Include any advertising relating to alcohol or gambling in photographs or film footage of children.

## REMEMBER

- It's not an offence to take appropriate photographs or film footage in a public place even if asked not to do so;
- No-one has the right to decide who can and cannot take photos or film on public land;
- If you have serious concerns about a possible child protection issue relating to the taking of photos or film footage then call the Police. This action should only be taken where you believe that someone may be acting unlawfully or putting a child at risk;
- The land or facility owner can decide whether or not photography and/or filming at football activities will be permitted when carried out on private land. However you need to make this known before allowing individuals access to the private property. If they do not comply then you may request they leave;

- Try not to use photos or film footage that include individuals wearing jewellery (as wearing jewellery whilst playing is contrary to the Laws of the Game as well as being a health and safety issue);
- That swimming as a social activity for football clubs presents a higher risk for potential misuse than football, so photos or film footage should:
  - Focus on the activity rather than a particular child;
  - Avoid showing the full face and body of a child – instead show children in the water, or from the waist or shoulders up;
  - Avoid photos and camera angles that may be more prone to misinterpretation or misuse than others.

If you are concerned about the inappropriate use of photos or film footage please report this to your County FA Designated Safeguarding Officer (DSO) or to The FA Safeguarding Team via [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com). Click [here](#) for a full list of key contacts at County FAs.

# FILMING AS A COACHING AID

The FA advises that coaches using filming as a legitimate coaching aid should make parents/carers and players aware that this will be part of the coaching programme. Care should be taken when storing the film clips – see further guidance below.

When a club captures photos or videos for coaching aids data protection rules are likely to apply. Clubs must clearly tell players and parents/carers, about how these images and recordings will be used. This helps ensure transparency and builds trust with players and families.

To legally use personal data like photos or videos for coaching aids, clubs need a valid reason – this is known as a ‘lawful basis’ under data protection rules. Consent is one possible option, but it may not always be the most suitable in this context due to the complexities of obtaining consent, particularly from opposition clubs. In some cases, another lawful basis may apply such as legitimate interest. Clubs should explain from the outset what their lawful basis is for coaching, so everyone involved understands why the images are being used.

Even if you do not rely on consent, we recommend that parents/guardians are given the opportunity to opt-out.

Before filming, a club should inform the opposition and take onboard any legitimate concerns shared.

To avoid the potential for disputes, we would ask that all parties:

1. Follow The FA's good practice guidance;
2. Place children's welfare at the center of decisions;
3. Be respectful of others' views;
4. Consider if the filming is strictly necessary (in Grassroots football it is usually not).

Clubs should follow the rules/guidance that may be set by competition/tournament organisers and private facilities where it comes to filming.

## THE USE OF VIDEO ANALYSIS CAMERAS

There has been an increase in the use of video analysis cameras and technologies to capture football matches, usually from a high vantage point. They often do not require manual intervention, are generally used for coaching analysis and may include additional software to support performance analysis and facilitate sharing of data with coaches/managers and players.

## GUIDELINES FOR USE

- **Filming:** Follow the principles for photography and filming as detailed earlier within this guide.
- **Minimisation:** Where possible, ensure that footage of individual players is minimised (e.g., not zooming in on individual players' faces).
- **Performance analysis:** Where there is additional software focused on performance analysis ensure this is used proportionately and is appropriate to the age/level of football being played - generally in grassroots youth football any analysis should be used to inform coaching practice and not 1-1 analysis/critique of individual player performance.
- **Data Protection Compliance:** Ensure that all personal data captured via video analysis cameras complies with UK data protection legislation. This means ensuring parents/participants are informed how that they will be photographed and how it will be used (e.g. via a privacy notice), the club has identified a lawful basis for using captured footage (e.g. consent, legitimate interest), the footage is only used/shared for the purpose it was taken,

is stored securely, retained only for as long as needed, and that any personal data (e.g., images, videos, or other identifying data) is processed in line with data protection legislation and the applicable privacy notice.

# GENERAL PHOTOGRAPHY AND FILMING OF EVENTS

## INCLUDING THE USE OF BODY-WORN CAMERAS DRONES & LIVESTREAMING

At many events, organisers will wish to take wide-angle, more general photos, and/or film footage of the event, the site, opening and closing ceremonies, crowd shots and so on. It's usually not reasonable, practical or proportionate to secure consent for every participating child in order to take such photos or film footage, or to preclude such photography or filming on the basis of the concerns of a small number of parents.

In these circumstances, organisers should make clear to all participants and parents that these kinds of photos or film footage will be taken, and for what purposes.

Additionally, camera settings and/or editing software may enable backgrounds to be blurred obscured which may enable photographs to be taken and hide/remove individuals from view if necessary prior to sharing or hosting on a League/Club's webpages or posting on social media.

### BODY WORN CAMERAS

The FA does not currently support or endorse to use of body-worn cameras outside of strictly controlled FA trails agreed through IFAB (International Football Association Board) August 2025.

### USE OF DRONES

The use of drones in filming grassroots football matches can offer unique perspectives but comes with additional legal and safety considerations.

- **Flying:** Drones should not be flown directly above crowds, spectators, sports pitches/stadia or players whilst games are being played. The CAA (Civil Aviation Authority) provides detailed guidance on the use of drones including the [Drone Code](#) which should be followed at all times.
- **Permissions:** Operators must hold the appropriate licenses (e.g., Permission for Commercial Operations (PfCO) if the drone is used for commercial purposes). Additionally, before use of a drone permission should be sought from clubs, competition/tournament organisers and private facilities' owners before use.
- **Match Officials:** the number one priority of a match official is the safety of players and participants and therefore a match official may pause the game until such time the drone has passed or left the vicinity of players and spectators. For more guidance go [Dealing with Drones](#).

### LIVESTREAMING (GRASSROOTS EXCLUDING NLS, WNL & PRO GAME)

Livestreaming is when a video is broadcast in real time over the internet, without being recorded or stored. A livestream can be broadcast to large numbers of people, via online platforms such as YouTube, TikTok, Twitch, Facebook or Vimeo.

Where leagues/Clubs or tournament organisers wish to use live streaming, you must ensure you first consider if there are any safeguarding implications and follow the guidance and principles outlined within this guide in conjunction with The FAs **6.1 RUNNING WEBSITES AND SOCIAL MEDIA GUIDANCE**. Found [here](#).

If clubs want to livestream your activity for parents/carers to watch, you should:

- Inform Clubs/Teams in advance that the activity or event will be livestreamed.
- Set up cameras to provide wide-angle, general views of games, not close-ups.
- Put safeguards in place to enable/ the Club/league/Competition/ Tournament Organisers to respond appropriately to any concerns that may arise during the filming or viewing of the game/tournament.

- Restrict access to live streams to those with a legitimate interest to view the game/ event e.g. parents/carers members, etc.
- Turn off or closely monitor any 'chat' features throughout the livestream to prevent and/or remove any inappropriate comments.





# SECURE STORAGE

Photographs or film recordings of children must be kept securely:

- Digital photos should be in a protected folder with restricted access;
- Digital photos and film footage should not be stored on unencrypted portable equipment such as laptops, memory sticks or mobile phones.

Club and Leagues:

- If you're storing and using photographs to identify children and adults for official purposes – such as identity cards – ensure you comply with the legal requirements for handling personal information;
- For guidance on data protection and other privacy regulations, visit the Information Commissioner's Office (ICO) website: [ico.org.uk](https://ico.org.uk).





# MISUSE AND MANIPULATION OF PHOTOGRAPHS AND/OR FILM

An individual with bad intent may deliberately target a vulnerable child to take photos or film footage which may be uploaded to social media or shared with other like-minded individuals or groups motivated by sexual interest.

Occasionally, these photos or film footage are also used to threaten and force the child into unwanted, illegal sexual activity. Taking and sharing photos or film footage like this may form part of wider bullying of the targeted young person by other young people, motivated more by a wish to cause humiliation and embarrassment.

Even in the context of a shared joke among friends, without abusive intent, a young person taking and sharing inappropriate photos or film footage may be committing a serious offence and risk criminal prosecution.





# RESPONDING TO CONCERNS

Whether it's general club activities or when attending an event, all club officials, volunteers, children and parents/carers should be informed that if they have any concerns regarding inappropriate or intrusive photography or filming (in terms of the way, by whom, or where photography or filming is being undertaken), these should be reported.

Reports can be made to the:

- Event organiser or another official;
- Event Designated Safeguarding Officer;
- League/Club Welfare Officer;
- County FA Designated Safeguarding Officer;
- The FA Safeguarding Team via [safeguarding@TheFA.com](mailto:safeguarding@TheFA.com)

There must be processes in place to ensure that reported concerns are dealt with in the same way as any other safeguarding concerns. Concerns about professional photographers\* should also be reported to their employers.

To report potentially unlawful materials on the internet please contact:

The Police via:

W: [www.police.uk](http://www.police.uk)

T: 101 - non emergency number

CEOP (Child Exploitation Online Protection)  
Command of the National Crime Agency

W: [www.ceop.police.uk/Safety-Centre](http://www.ceop.police.uk/Safety-Centre)

IWF (Internet Watch Foundation) -  
anonymously report online child sexual  
abuse imagery

W: [www.iwf.org.uk](http://www.iwf.org.uk)

**Note:** Whilst The FA/County FA will seek to support and assist those raising concerns, as appropriate on a case by case basis, where imagery/film has been taken and/or shared by spectators (inc Parents/Carers) lawfully, The FA/County FAs have no regulatory powers to enforce its removal or deletion.

\* Including filming

*In writing this photography and filming guidance,  
The FA has drawn from advice provided by the NSPCC CPSU.  
You can find this advice [here](#)*





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