



GolfRSA Safeguarding Policy

Supplement 8: Photography, Video and Use of Images

[Version: January 2024]

1. Taking photographs or videoing people in public places in South Africa is legal, whereas consent needs to be given to photograph or video people in a private place. Reproducing and selling photographs of people is legal for editorial and limited fair use commercial purposes. Civil law requires the consent of any identifiable persons for advertorial and promotional purposes.
2. The sport of golf can benefit from the use of images of participants to promote and celebrate activities, events and competitions. Parents and children generally welcome opportunities to celebrate or publicise their involvement and achievements in the sport through photographs and video recordings. Golf coaches also find it helpful to use photographs or videos as a tool to support a golfer's skills development.
3. The guidelines contained in this section have been developed with the aim of increasing the safety and well-being of children, persons with a mental and/or physical disability, young and vulnerable adults and for the avoidance of the following potential sources of harassment or abuse:
 - Using, adapting or modifying images for the purpose of harassing or abusing participants in the sport or to identify persons in-order to harass or abuse them;
 - Using images for child abuse purposes, or adapting and modifying them for this purpose;
 - The potential identification of a child from their personal information and the possible grooming which could occur as a result;
 - The potential identification of children that have been recognised as being at risk for reasons including:
 - Having been removed from their family for their own safety;
 - Restrictions on parental access following the separation of parents;
 - Being a witness in legal proceedings.
4. GolfRSA recognises that photos and videos on websites and social media, and in posters, the press or other publications, can be misused posing direct and indirect risks to children, persons with a mental disability, young people and vulnerable adults. Children in particular may be subjected to grooming, harassment, abuse and bullying as a consequence of an image recorded on any device.

5. The following policy and procedures are aimed at safeguarding children and adults participating in golf from risks associated with the misuse of images captured through any device.

GolfRSA, Unions and Clubs

6. GolfRSA recommend the following advice for Unions and clubs:
 - Unions and clubs should have a policy in place covering the recording of images of golfers. The policy may include a ban on all the recording of images of golfers or the requirement for anyone recording images of golfers to first register with Unions or club. This policy applies to everyone attending club sessions including official photographers/videographers, golfers, coaches, parents, club officers, staff and spectators.
 - Where the club conducts activities at a public venue they should consult the operators of the facility regarding their policy covering the recording of images.
 - The club policy should apply a ban on the recording of images of any form in changing rooms, toilets and first aid areas. The ban should include the use of smart phones, which can take photographs and record video, in changing rooms, toilets and first aid areas.
 - If imagery of a golfer under 18 years of age is published or used by the member or affiliated club for any reason the athlete's parents/carers should give consent.
 - A golfer's parents/carers should have the opportunity to refuse their child being photographed. This should not exclude the child from any member or club's activities.
 - A photography consent form template is available from the GolfRSA website and/or on the tournament application form.
 - If the club is hosting an event, it should be made clear to all parents/carers if a designated photographer is going to be present and if so they should be provided with the opportunity to confirm if their child is eligible to be included in photographs. It should also be made clear that there could be other parents/carers taking photographs during the event and in these cases they will have submitted a registration form and have agreed to only photograph the child(ren) they are responsible for. It is worth remembering that while their child(ren) should be the main focus of any imagery there is the potential for other children to be in the background of these photographs.
 - Care should be taken when using any images showing children or vulnerable adults on their website, social media or other publications.
7. Further considerations for capturing images include:
 - Action shots should demonstrate the spirit of the sporting activity and only use images of children or vulnerable adults in suitable dress or kit.
 - The photographs should focus on the action and, where possible, be a group shot as opposed to focusing on individuals.
 - Providing anyone who registers to take photographs during club activities should be provided with clear guidance as to what images are acceptable to capture.

- If the images are being taken by a member or club appointed photographer for the use of the club it should be agreed who will take charge of the images and manage their use.
 - Recognise that golf presents a higher risk for potential misuse than other sports, so images of these activities should:
 1. avoid showing the full face and body of a child or vulnerable adult – instead show children from the waist or shoulders up;
 2. avoid images and camera angles that may be more prone to misinterpretation or misuse than others;
 3. provide coaches who use images of athletes as part of their training with clear guidelines by which they are required to comply, including use of the images, consents, and retention, safe storage and confidentiality.
8. GolfRSA, Unions and clubs and events should apply a ban on photography of any form in changing rooms, toilets and first aid areas. Where they use another organisation's facilities should ask the facility owner to implement a ban on photography in these areas. The ban should apply to all participants, spectators, staff and volunteers. This includes the use of smart phones which can take photographs and record video.
9. GolfRSA clubs should warn parents and spectators that there can be negative consequences to sharing images linked to information about their own or other people's children on social media (Facebook, Twitter) – and care should be taken about 'tagging'.

Recording of Images at Events

10. Event organisers should have in place a policy on recording images of golfers at their event. The policy may include a ban on all the recording of images of golfers or the requirement for anyone recording images of golfers to first register with the member or club. This policy applies to everyone attending club sessions including official photographers/videographers, golfers, coaches, parents, club officers, staff and spectators. If the event is taking place in a public space it may be difficult to enforce restrictions on the recording of images except in respect of the competition area.
11. There should be a ban on all recording of images in changing rooms, toilets and first aid areas. The use of smart phones which can take photographs and record video should be restricted in these areas.
12. Although parental consent is not required for photography by the public, event organisers should make the photography policy clear to all participants and parents ahead of the event.
13. Event organisers should use event programmes, entry forms, information forms and signage to communicate the event's policy of the recording of images to all participants, officials, parents, spectators.
14. Where an event organiser requires anyone wishing to take photographs to register. Communicating this to the public is essential, together with establishing a straightforward process for doing so. Individuals will usually register via a basic form and receive a sticker or equivalent to indicate they have undergone the process. Staff, volunteers, participants, parents, spectators and the public need to be both informed about this process and

encouraged to report to anyone apparently taking photos without the necessary registration.

15. Any concerns regarding the recording of images at an event should be communicated to the event organiser or the event safeguarding officer(s).
16. If there are concerns or suspicions about potentially criminal behaviour this should include referral to SAPS.
17. Event organisers should appoint a safeguarding officer for events that cater for children or vulnerable adults. For club events this may be the club's safeguarding officer.
18. Where an official or professional photographer/videographer will be attending an event, GolfRSA, members and affiliated clubs must:
 - check the photographer's identity, the validity of their role, and the purpose and use of the images to be taken;
 - issue the photographer with identification, which must be worn at all times;
 - provide the photographer with a clear brief about what is considered appropriate in terms of image content and their behaviour;
 - clarify areas where all photography is prohibited (toilets, changing areas, first aid areas, and so on);
 - inform the photographer about how to identify – and avoid taking images of – children without the required parental consent for photography;
 - don't allow unsupervised access to children or one-to-one photo sessions at events;
 - don't allow photo sessions away from the event – for instance, at a child or vulnerable adult's home;
 - clarify issues about ownership of and access to all images, and for how long they'll be retained and/or used.

Guidance for video recording a child during training sessions

19. There should be a clear and valid reason as to why video recording a child during a training session would be necessary, a primary reason for this would be for athlete development and mastering a skill. If there is a valid reason consent would need to be obtained from the golfer's parents/carers before the video recording is completed and they should also be offered the opportunity to sit with the child when the video is reviewed. Once the content has fulfilled its purpose it should be deleted unless there is a valid reason for keeping the video recording.

Privacy considerations

20. Images or video recordings of children must be kept securely:
 - hard copies of images should be kept in a locked drawer
 - electronic images should be in a protected folder with restricted access
 - images should not be stored on unencrypted portable equipment such as laptops,

memory sticks or mobile phones

21. Avoid using any personal equipment to take photos and recordings of children – use only cameras or devices belonging to your organisation.
22. 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 (Protection of Personal Information Act).

Talented young athletes

23. As young golfers progress up the competitive ladder, their sporting success can lead to an increased public profile:
 - elite-level events are more likely to take place in a public arena;
 - GolfRSA, its members and affiliated clubs and events will look to positively promote the sport;
 - elite young athletes who receive endorsements or sponsorship may welcome positive media coverage on a local, district, provincial or national level;
24. In these cases, some aspects of our guidance around the use of images and publishing identifying information are neither practical nor desirable.
25. Event organisers retain their duty of care to these golfers and a responsibility to safeguard them. They must ensure that children and their parents/carers consent to images being taken and what information will be published alongside them. It is important that good-practice guidance regarding supervision and the nature and use of images are applied.
26. In addition, golfers, their parents and media representatives need to be clear about appropriate arrangements and ground rules for interviews, and for filming and photo sessions. Sports organisations should help to manage these issues as part of their overall support of elite athletes.

Use of CCTV at Golf Clubs and Facilities

27. If a golf club or facility intends to use a live video stream of leisure activities for parents to spectate, which is displayed in public areas, facilities should make sure that:
 - all customers are aware;
 - images are not recorded;
 - footage is shown without sound (reduces potential identification of individuals);
 - there are arrangements in place to respond to any concerns about anyone watching the stream whose behaviour gives cause for concern.

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