



Brackley Gymnastics School

Photography & Filming Policy

Version	Date	Authorised by	Changes made
V1	16/03/2026	Natalie Baker – Club Director	Launch

Policy Relationship Statement

This policy forms part of the safeguarding and operational framework used by Brackley Gymnastics School.

These policies apply to members, parents, carers, visitors, and other participants involved in Brackley Gymnastics School activities. Where relevant, the policies listed below should be read together to support safeguarding, welfare, and the safe and respectful operation of the club.

Linked Documents List

Brackley Gymnastics School – Gymnasts’ Code of Conduct
Brackley Gymnastics School – Whistleblowing Policy
Brackley Gymnastics School – Complaints Policy (Members & Visitors)
Brackley Gymnastics School – Anti-Bullying & Harassment Policy
Brackley Gymnastics School – Parents, Carers & Guests Code of Conduct
Brackley Gymnastics School – Child Protection Policy
Brackley Gymnastics School – Safeguarding Adults at Risk Policy
Brackley Gymnastics School – Safer Recruitment Policy
Brackley Gymnastics School – Equality, Diversity & Inclusion Policy
Brackley Gymnastics School – Privacy Notice & Data Protection Statement

1. Purpose

Brackley Gymnastics School (“BGS”) is committed to safeguarding every gymnast’s welfare, dignity, and privacy.

This Policy explains how BGS manages photography and filming to:

- Protect gymnasts from potential harm or misuse of images;
- Comply with data-protection and safeguarding laws; and
- Ensure responsible use of imagery in line with recognised safeguarding standards.

BGS ensures this Policy is consistent with the safeguarding and operational standards set by our governing body and will aim to meet or exceed those requirements.

2. Scope

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This Policy applies to all:

- Gymnasts, parents, guardians, guests, and visitors attending BGS training sessions, classes, and events; and
- Any photography, filming, or recording activity conducted in connection with BGS.

It covers all devices capable of recording still or moving images, including cameras, mobile phones, tablets, and wearable devices.

3. Legal and Regulatory Context

This Policy operates in accordance with:

- The Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR);
- Children Act 1989 and Children Act 2004;
- Working Together to Safeguard Children (2018); and
- Relevant guidance from our governing body relating to safeguarding and photography.

Under UK law, any image that can identify a child constitutes personal data, and its processing must be fair, lawful, and transparent.

4. Filming and Photography within BGS Venues

To protect all members:

- Photography and filming are strictly prohibited within BGS training venues or during any session, class, or activity under the management of Brackley Gymnastics School.
- No photography or filming may take place without explicit written authorisation from BGS Leadership, granted in advance and for a specific purpose.
- This restriction applies equally to parents, guardians, spectators, gymnasts, and guests.

Unauthorised recording constitutes a breach of BGS Safeguarding Policy and may also represent a data-protection or child-protection concern.

BGS reserves the right to require the deletion of any unauthorised images or recordings and to remove individuals from the premises if necessary.

5. Authorised BGS Photography and Filming

Where written consent has been provided, BGS may capture and use photographs or video footage for legitimate and positive purposes, including:

- Coaching and technical development (e.g. skill analysis or performance review)
- Internal educational use (e.g. training resources, skill cards, staff training)
- Promotional purposes (e.g. website, social media, printed materials, displays, newsletters)

Only gymnasts with full parental or guardian consent will be included in imagery.

BGS does not accept partial, verbal, or conditional consent.

5.1 Use and Ownership of Imagery

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With consent, photographs and videos captured for legitimate club purposes — including skill cards, coaching materials, education, display, or promotional content — become the intellectual property of Brackley Gymnastics School (BGS).

BGS will use such imagery only for agreed purposes and will handle all personal data in line with the UK GDPR and the Data Protection Act 2018.

Consent for imagery can be withdrawn at any time for future use; however, BGS cannot retrieve or remove imagery that has already been lawfully released into public circulation (such as printed or online publications).

If consent is later withdrawn, BGS will stop capturing or creating new imagery of the individual, but any materials already produced or published while valid consent was in place — such as skill cards, coaching resources, or promotional materials — may continue to be used by BGS as part of its legitimate operational and educational activities.

6. Consent

- Consent is obtained at the time of membership registration.
- Parents or guardians must select either full consent or no consent.
- Consent records are securely stored by BGS and reviewed periodically.
- Consent may be withdrawn at any time (see Section 9).

No imagery will be taken or used without valid consent except where required for safeguarding, security, or legal purposes.

If consent is withdrawn, BGS will cease any future use of that individual's imagery.

However, it may not be possible to remove or retrieve images or videos that were previously released or distributed (internally or externally) prior to withdrawal, as these may already be in public or third-party circulation.

Acceptance of a place in any display, development, or competitive position constitutes automatic full consent to the capture and use of imagery and video for the purposes of coaching, competition, performance review, and promotion.

By accepting such a placement, members and parents/guardians acknowledge that photography and filming form a necessary part of participation in these programmes.

7. External Events and Competitions

BGS acknowledges that at external events, displays, and competitions:

- Photography and filming may be permitted or managed by the event organiser;
- BGS has no authority to restrict third-party photography or media activity; and
- Images may be captured by other clubs, governing bodies, or media representatives.

By entering such events, members accept that their image may be taken and used in line with the organiser's policy, which is outside BGS's control.



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8. Storage, Retention and Data Protection

All authorised imagery captured by BGS is:

- Stored securely on password-protected systems or devices accessible only to authorised staff;
- Used solely for the legitimate purposes described in this Policy; and
- Retained for as long as necessary to support the educational, coaching, and promotional aims of the Club.

The retention purpose is to provide gymnasts with visual aids during training, to provide coaches with training and development tools, and to support marketing and promotional activity where full consent has been provided.

Some authorised imagery may be retained as part of the BGS Coaching Library, which forms part of the Club's intellectual property.

Materials held in the Coaching Library are used for internal educational and professional-development purposes, while other approved imagery may be used for promotional and advertising purposes in accordance with the consent provided.

Authorised imagery may also be shared, when appropriate, with our governing body for purposes including safeguarding, compliance, publicity, and sport-development initiatives.

Imagery will be securely deleted or archived when it is no longer required for these purposes or when consent is withdrawn, whichever occurs first.

All image processing and storage are undertaken in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

9. Suspected Photography or Filming

If a member of staff reasonably believes that photography or filming may have taken place in breach of this policy, the individual concerned may be approached and asked to clarify the situation.

Staff may request that the device be checked to confirm whether any images or recordings have been taken. If images or recordings have been captured in breach of this policy, the individual will be asked to delete them immediately in the presence of a member of staff.

This includes situations where a device appears to be positioned, held, or used in a way that could reasonably indicate that an image or recording is being captured.

Where an individual refuses to cooperate, behaves inappropriately, or where safeguarding concerns arise, Brackley Gymnastics School reserves the right to ask the individual to leave the premises and may take further action in line with safeguarding procedures and club policies.

10. Withdrawal of Consent

Parents or guardians may withdraw consent at any time by providing written notice to BGS.

- Withdrawal applies from the date received and prevents future use of the gymnast's imagery.
- Previously used materials will not be recalled or deleted if used lawfully before withdrawal.
- BGS will confirm receipt and update consent records accordingly.

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11. Reporting Concerns

If anyone observes unauthorised photography or filming within a BGS training venue, they should report it immediately to a senior coach or the BGS Welfare Officer, Sharni Hughes, via bgs.welfare@gmail.com.

Concerns will be treated seriously and investigated promptly under BGS Safeguarding Procedures. If appropriate, BGS may escalate matters to law enforcement or data-protection authorities.

12. Enforcement and Disciplinary Action

BGS reserves the right to take appropriate action in response to breaches of this Policy, including:

- Requesting immediate cessation of unauthorised recording;
 - Deletion of unauthorised images or videos;
 - Removal from the premises; and
 - Suspension or termination of membership where required for safeguarding.
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13. Policy Review and Oversight

This Policy will be reviewed annually, or sooner if legislation or national guidance changes. Updates will reflect best practice from our governing body and UK safeguarding authorities. All decisions under this Policy will prioritise the safety and wellbeing of gymnasts above all other considerations.

14. External Photographers and Videographers

Where BGS engages or authorises an external photographer or videographer to capture imagery on behalf of the Club, the following conditions apply:

- All external photographers and videographers must be approved in writing by BGS Leadership prior to attendance at any BGS event, class, or activity.
 - They must provide evidence of identity, compliance with an internal DBS check, and relevant insurance.
 - All imagery or video captured at a BGS event remains the intellectual property of Brackley Gymnastics School.
 - Such material may only be used for purposes directly connected with Brackley Gymnastics School and must not be used for any independent, personal, portfolio, or promotional use by the photographer or videographer.
 - All imagery must be transferred securely to BGS within an agreed timescale following the event (normally within 7 days).
 - Following the conclusion of the assignment, all original files and backups held by the photographer or videographer must be securely deleted within 30 days.
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- The photographer or videographer must provide written confirmation to BGS that all files have been securely deleted in accordance with this requirement.
- BGS reserves the right to audit or request confirmation of compliance at any time.

Failure to comply with these requirements will be treated as a breach of data-protection and safeguarding obligations and may result in termination of the arrangement and/or further action.

15. Policy Conclusion

By participating in Brackley Gymnastics School activities, members, parents, carers, visitors, and external providers agree to comply with this policy in full.

Brackley Gymnastics School leadership will monitor compliance with this policy and take appropriate action where behaviour or actions place the safety, privacy, welfare, or respectful operation of the club at risk.

16. Review

This policy will be reviewed at least annually, or sooner if required by changes in legislation, safeguarding guidance, governing-body standards, or Brackley Gymnastics School operational practice