

# Photography and Filming of Children in Football

**Draft policy and practical guidance for clubs, leagues and Associations**

Version 1.0 | Revised 10 November 2026 | Approval and effective date: 27 November 2026

## 1 Purpose and status

SYFA supports photography and filming that celebrate participation, record achievements and help players develop. Children's safety, dignity and wishes must come first. This policy explains how clubs, leagues and Associations should organise photography, record matches, use images and respond to concerns.

It covers everyone under 18, including players, young officials and spectators, at matches, training sessions, tournaments, presentations and football trips. It applies to photographs, video and associated audio, including those captured on mobile phones, by automated cameras, on online platforms and via livestreams.

Rule 84 requires photography and videography to comply with Scottish Football's Safe Use of Images Practice Note. This guidance supports that rule and SYFA's Child Wellbeing and Protection Policy (CWPP), Part 5, particularly Celebration — Photography and Filming (pages 13–18). It does not replace the CWPP or amend disciplinary powers. Additional operational safeguards in this draft remain subject to SYFA approval. [1, 9]

## 2 Responsibilities

- Club committees adopt and communicate the policy, appoint a photography lead and ensure consent, equipment and storage arrangements are in place.
- The Child Wellbeing and Protection Officer (CWPO) advises on individual safeguards and manages concerns through the relevant child protection procedures.
- Leagues and Associations set event arrangements, identify the person authorising photography and communicate requirements to all participating clubs.
- Team officials check both teams' permissions and every appointed match official's written consent before recording starts. Photographers, coaches, parents and players follow the agreed restrictions.

### The essential safeguard

**No child should lose their place in football because they do not wish to be photographed or filmed. If recording cannot be carried out safely while respecting the child's wishes, change or stop the recording arrangements.**

veo
OFFICIAL PARTNER
Scottish Youth FA

# 3 Consent and children's choices

For organised images of participating children, obtain completed consent before capture and publication. Silence or attendance does not constitute consent. The specific SYFA spectator provision below is separate from participant consent. [9, p14]

### Who should agree

Ask every child in a way they can understand and respect a refusal, including on the day. In line with SYFA CWPP Part 5, this policy requires the child's agreement, according to their understanding, together with permission from their parent or carer with appropriate authority for organised images of under-18s. For looked-after children or where authority is disputed, seek confidential CWPO advice and establish who can authorise the arrangement.

This is a safeguarding requirement, not a statement that every person under 18 lacks legal capacity. In Scotland, children aged 12 or over are presumed to have capacity to consent for data protection purposes unless the contrary is shown. The child's rights must be respected. The age-13 provisions for communication and health are not a photography threshold. Refer consent conflicts or unsafe parental involvement to the SYFA safeguarding lead before recording; do not exclude the young person. [6, 9]

### Make the choices specific

- Explain the purpose, what will be captured, who can see it, named websites or platforms, any external recipients and how long it will be kept.
- Record separate choices for private coaching footage, printed material, public websites or social media, and any livestream. Obtain additional express permission for external media, sponsors or other agencies.
- Refresh permissions each season and whenever the purpose, audience or platform changes. Record the date, information supplied and any restrictions. Do not use pre-ticked boxes or make publicity consent a condition of membership.

### When permission is refused or withdrawn

Tell the photographer discreetly which players must not be recorded, using team and shirt numbers or another reliable, private method. Keep the reasons confidential. Do not publicly identify children with safeguarding restrictions or require them to wear a conspicuous marker.

Plan camera positions and group photographs accordingly. Do not assume that a wide shot or an automated camera renders a player unidentifiable. Blurring after recording does not address a refusal to be recorded in the first place. If avoidance is not reliable, do not record that activity.

Provide an easy way to withdraw permission. Stop any future use, update the consent record, and remove material within the organisation's control where required. Seek removal from recipients and platforms. Explain that printed copies, screenshots, and third-party resharing may not be recoverable. Any necessary retention for safeguarding or legal purposes must be separately justified, restricted, and explained where safe.

veo
OFFICIAL PARTNER
Scottish Youth FA

# 4 Arranging photography at matches

## Permission and registration

Obtain the opponent's written consent before recording any SYFA fixture, and retain it with the match records. Both clubs must approve the recording plan via their secretaries or authorised delegates. This does not replace individual consent. Obtain the tournament organiser's approval and any applicable SYFA authorisation for Scottish Cup fixtures or finals. [3; 9, p16]

## Match officials' consent

Before filming, approach every appointed referee and assistant referee and obtain their written consent to the recording and its intended uses, including any audio, publication or livestream. Record the agreement on the Match Recording Permission Form or retain written confirmation. Silence, attendance or notification is not consent. [10]

Every match official may refuse or withdraw consent without giving a reason or being pressured. If any appointed official refuses, filming must not begin; if consent is withdrawn during the match, filming must stop promptly. Do not replace the official simply to enable filming. This applies equally to manual and automated cameras and to livestreams. [10]

For an official under 18, also follow section 3 on the young person's agreement and parent/carer permission. An official's agreement covers their own inclusion; it does not replace team or individual permissions, nor does it make the referee responsible for checking everyone's consent forms.

Professional, media, student and commissioned photographers should normally apply at least five working days before an event. Register approved operators on the day. Record their name, organisation, contact details, purpose, equipment, permitted location and intended use. Check identity proportionately; do not routinely copy identity documents or collect home addresses unless there is a justified need.

Confirm that each team has the necessary individual permissions and a practical way to protect children who must not appear. Share only the restrictions required to implement the plan, not the reasons or full consent records. Publicise the arrangements before the event and display a contact point on the day.

## Brief the photographer

- Give written instructions covering permitted content, locations, consent restrictions, storage, publication and deletion. Issue visible identification to official photographers.
- Agree ownership and permitted use in writing. No sale, portfolio use, advertising, onward licensing or supply to third parties without specific authorisation and the required permissions.
- No unsupervised access to children is permitted under this draft. A supervised individual portrait session requires explicit agreement from the child and parent/carer and organiser approval. Do not arrange sessions at a child's home. The CWPP's explicit-agreement exception does not remove other safeguarding duties. [9, p15]

## Automated cameras and coaching footage

Systems such as Veo must follow the same consent and approval process. Before use, review camera coverage, cloud uploads, access permissions, downloads, audio, and automatic publishing. Use restricted team access for coaching; disable public sharing and unnecessary audio. Coaching permission does not authorise highlights, social media, or a public broadcast.

Check substitutes, young officials, adjacent pitches and spectators, and players on the field. An operator must be able to stop recording promptly. If a child who must not be filmed cannot be reliably excluded from the recording, do not use the system.

## Livestreaming

Livestreaming requires a separate event risk assessment, explicit permission from participants and every appointed match official for that use, and organiser approval with CWPO advice. State the platform, audience, start and finish times, and who will monitor and stop the stream. Prefer controlled access and wide views; disable comments and unnecessary audio. Disable automatic recordings and replays unless separately explained and authorised. Warn that viewers may still record or redistribute the stream. If consent restrictions cannot be met in real time, do not stream.

# 5 Taking and sharing images safely

### Places and images that are prohibited

- Never photograph or film in changing rooms, showers, toilets, sleeping areas or areas used for private treatment. This includes team celebrations, selfies and footage taken by children.
- Camera devices must be switched off and put away before entering changing or shower areas. Any essential accessibility or medical device arrangement must protect everyone's privacy and be agreed with the CWPO.
- Do not record or publish images that are sexualised, humiliating, intrusive or demeaning, or show a child distressed, receiving treatment or in a state of undress. Never use footage to shame a player, official or opponent.

### Choose images with care

Use appropriately dressed children, typically in a shirt and shorts or suitable training clothing, with relevant safety equipment. Focus on football activities and use group celebrations where possible. Check backgrounds, camera angles, captions and sound before release. Reflect the range of children participating without singling anyone out because of disability or another personal characteristic. [2, 4]

Do not publish children's full names, home addresses, or personal contact details on websites or social media. Avoid other identifying details and do not tag children. Share private coaching and meeting arrangements only with those directly concerned. Direct enquiries to the organisation. [9, p18]

An authorised adult must review the image, permissions, caption and intended audience before publishing. Use only approved organisational accounts. Do not upload children's images to generative AI services, facial recognition systems or tools that allow unrelated reuse without a separately approved safeguarding and data protection assessment. Never manipulate images to sexualise, ridicule or misrepresent a child.

### Parents, carers and spectators

Parents' and children's match photographs are restricted to immediate family for private, non-commercial use and must not be posted on personal online accounts. Before supplying copies, obtain confirmation that recipients will not upload them to their own or a child's accounts, or share them by any other method, including messaging or forwarding. Staff and volunteers must not use personal devices for official recording. Read the CWPP's broader personal-device wording alongside its family-photography provision; refer any uncertainty to the CWPO. [9, p15–16]

SYFA spectator photographs: "Photographs of children and young people attending games as spectators may be used by the SYFA for commercial purposes as specified in the terms and conditions for ticket purchase." This retained CWPP provision applies to SYFA spectator images; it does not provide blanket authority for clubs or for images of participating players. The relevant ticket terms must specify the intended use. [9, p18]

### Public and private venues

Organisers may set and enforce reasonable conditions within their authority at a venue or event. However, this policy does not give them control over unrelated members of the public using public land. Ordinary photography in a public place is not automatically unlawful. Explain concerns calmly and seek cooperation; report threatening, intrusive or suspicious conduct via the safeguarding route. Do not seize devices, demand passwords or compel deletion. [2, 4, 7]

For overseas events, check the host Association's photography rules and explain them to families. Proposed drone use requires approval from the organiser and venue, a separate risk assessment, and compliance with applicable aviation requirements. [9, p16]

# 6 Storage concerns and breaches

### Protect images and personal information

Use club or organisational equipment, or an approved contractor's equipment, and approved storage for official photography and coaching footage. Coaches and volunteers must not use personal phones, personal cloud accounts, or private messaging groups as the organisation's image collection or archive. Transfer files securely, restrict access to named authorised adults, and remove working copies when no longer required. [2, 5]

Identifiable images are personal information. The organisation deciding why and how they are used must record its lawful basis, provide accessible privacy information, and comply with the UK GDPR and the Data Protection Act 2018. This policy's permission requirements still apply even where another lawful basis is appropriate. Purely personal family photography may fall outside data protection law, but that does not remove the event's safeguarding expectations. [6, 7]

Use encryption, strong passwords and multifactor authentication where available. Agree responsibilities with service providers, including access, permitted use, security, deletion and any overseas transfers. Assess privacy risks before introducing a platform or recording system, and complete a data protection impact assessment where required.

Report lost devices, unauthorised access or accidental sharing promptly to the organisation's data protection contact. Contain the incident and assess whether any notification to the ICO and affected people is required.

Set and explain a retention period for each purpose before collecting images. Review coaching footage when its coaching purpose ends, and review published material at least each season. Delete material no longer needed, including exports and device copies, and manage backups in line with the retention schedule. Retain only necessary consent and access records. SYFA-held images must comply with SYFA's Data Retention Schedule; member organisations must document their applicable arrangements. No indefinite retention by default. [9, p18]

### Respond immediately to a concern

- Protect the child and stop an official recording or publication if needed. Listen calmly, record the child's words and explain what will happen next.
- Report promptly to the club CWPO or event safeguarding lead and through SYFA's current child wellbeing and protection reporting procedure. If that person is implicated or unavailable, report directly to SYFA's safeguarding lead.
- Call 999 if someone is in immediate danger. For suspected offending without an immediate emergency, contact Police Scotland on 101. Safeguarding action must not wait for a disciplinary hearing.
- Record the time, place, operator, behaviour, platform or URL and actions taken. Do not download, copy, forward or ask to view suspected child sexual abuse imagery. Obtain police advice on evidence preservation. For other relevant material, preserve the original securely with restricted access.
- Seek removal of inappropriate online material and report it to the platform. Inform parents or carers unless doing so may increase risk or compromise an investigation; agree this with safeguarding professionals.

### Breaches and match decisions

Stop or restrict recording and refer any alleged misconduct to the appropriate authority. Rule 84 and relevant disciplinary provisions may apply. Offensive electronic material is addressed by EM07, EM19, EM32 and EM61, and EM23 concerns certain disclosures of personal information. The applicable charge depends on the facts and the person or body involved. This policy does not impose automatic sanctions. [1, 8]

A disagreement over photography does not, in itself, require automatic abandonment or determine the match result. Stop filming where consent is absent or withdrawn, including when a match official exercises their veto. Protect any child affected. Any interruption or abandonment must be handled by the referee and the relevant competition authority under the applicable rules, with safeguarding advice where needed.

veo
OFFICIAL PARTNER
Scottish Youth FA

# Photography Consent Record

The club or organiser must obtain written permission in advance of any photography or filming – Rule 84 SYFA Supplementary & Playing Rules.

SYFA recommends the use of their **SYFA Match Recording Permission Form** as best practice. This form can be found by using this LINK

However, it is recognised that it may not be possible in every circumstance to access the form or to complete it. This does not diminish the responsibility to obtain the necessary approvals and consents.

Every effort should be made to capture the required consent in writing, retain it, and make it available to the SYFA if requested.

veo
OFFICIAL PARTNER
Scottish Youth FA

# Appendix A Implementation and sources

### Before the first use

- Committee records adoption, effective date, policy owner and annual review date.
- Publish the photography lead, CWPO and SYFA escalation contact through the organisation's normal channels and on its event notice.
- Brief players, families, coaches, photographers and visiting teams; provide an accessible explanation for children.
- Set up consent records, approved devices, access controls and retention arrangements. Establish a private method for sharing restrictions.
- For each match, confirm both teams' permissions and every appointed match official's written agreement, operator registration and the plan for children who must not be captured. Check livestream settings separately.

### Points for SYFA approval

The CWPP is the primary SYFA safeguarding reference. Positive consent replaces assumed consent in the earlier Issue 3 code. Written opponent approval, approved-contractor equipment and the family non-sharing undertaking are CWPP requirements. SYFA must confirm current event authorisation contacts before issue.

Proposed additional safeguards include five-day accreditation, supervised-only individual sessions, livestream risk assessment and access controls, and AI and drone controls. These are operational proposals, not quotations of existing CWPP requirements. The accepted CWPP spectator ticket provision is retained. Its photography consent requirements have no blanket age-13 threshold.

The match-official consent and veto provisions reflect the Referees' Association response supplied to SYFA. They are expressly included in this policy and are not presented as wording already contained in Rule 84. [10]

### Source documents

[1] SYFA Supplementary and Playing Rules 2026–2027, Issue 16, August 2026, Rule 84, printed page 18. Uploaded copy dated 14 October 2026.

[2] Scottish FA, Celebration Photography and Filming, supplied practice note. Consent, safe use, matches and events, internet use, storage and retention sections.

[3] SYFA, Code of Good Conduct for the Use of Photographs and Images, supplied Issue 3 file. Particularly sections 2–10 and 12. Conflicting provisions are addressed above.

[4] The FA, Guidance Notes 8.3, Photographing and Filming Children, version 1.2, July 2020. Used as supporting practice guidance, not as Scottish governing rules.

[5] NSPCC Sport — Photography and filming in sports and activities

[6] ICO — Lawful bases and children's personal information

[7] ICO — Taking photographs and data protection

[8] SYFA Disciplinary Procedures, version 14 August 2026, including EM07, EM19, EM23, EM32 and EM61. Online guidance consulted 14 October 2026.

[9] SYFA Child Wellbeing and Protection Policy 2025, Part 5, Celebration — Photography and Filming, pp13–18; Communication and Social Media, pp19–23; Health, p24. Supplied November 2026.

[10] Referees' Association response supplied by SYFA on 10 November 2026: referees should be approached for consent and have the option to veto filming, as other participants do.