

DIGITAL RECORDING AND FILMING POLICY

POLICY AREA	Operations & Gym
DATE WRITTEN	01 July 2025
DATE APPROVED BY BOARD	08 August 2025
RESPONSIBLE OFFICER	General Manager Operations
RELATED DOCUMENTS	ANU Sport Facilities Condition of Hire Safeguarding Children code of conduct.docx Member Protection Policy - 2024.01.24 Digital Recording, Filming, and Photography approval application form
CURRENT VERSION	1.0

1. PURPOSE

This policy sets out how digital recording, photography, filming, live-streaming and any other form of image or audio capture may occur at ANU Sport venues, programmes and events.

It safeguards the safety, dignity and privacy of all participants—especially children and young people—and ensures compliance with:

- Safeguarding Children & Young People Policy
- Child Safe Code of Conduct
- ANU Sport Facility Hire Terms & Conditions (the “Conditions”)
- ANU Sport Member Protection Policy

2. SCOPE

This policy applies to:

- All ANU Sport employees, Board members, contractors, volunteers, affiliated clubs and Members.
- Hirers of ANU Sport facilities and any person under a Hirer’s direction or control.
- All visitors, spectators and media representatives on ANU Sport premises or at ANU Sport events.
- All forms of digital recording, including photography, videography, live streaming, drone footage and audio capture, whether for commercial, coaching, security or personal use.

3. POLICY

ANU Sport recognises patrons’ expectations for digital recording, filming and photography, but this expectation is balanced with other patrons’ expectations of privacy and protecting children and

young people from abuse and harm. In allowing digital recording, filming and photography, ANU Sport applies the following conditions:

3.1 Unlawful Digital recording, Photography and Filming

- 3.1.1 It is unlawful for images or footages to be taken that are:
 - 3.1.1.1 Indecent, which includes any form of nudity, 'up skirting', 'down blousing' or any footage obtained covertly.
 - 3.1.1.2 Taken in change rooms or toilets or where an individual has a reasonable expectation of being accorded privacy in a public place.
 - 3.1.1.3 For the purposes of voyeurism or in an otherwise provocative or sexual manner
 - 3.1.1.4 Of individuals protected by court order as this can divulge an individual's location and place them in danger.
 - 3.1.1.5 Being used for commercial purposes (to endorse or sell a product) without permission.

3.2 Overriding Authority – Approval First

- 3.2.1 Excluding for private and non-commercial purposes, no filming, photography, audio recording or live streaming may take place anywhere on ANU Sport premises or at ANU Sport events without the prior written approval of ANU Sport management.
- 3.2.2 Where filming or recording is for private and non-commercial purposes, no other individual should be captured in the recording. If another individual is captured in the recording, consent must be obtained.
- 3.2.3 Approval is event-specific and time-limited; a new request is required for each occasion.
- 3.2.4 To obtain approval, the individual must submit an online application no less than 72 hours prior to the filming taking place. Where there is less than 72 hours, an email must be sent to the General Manager – Operations, via sport@anu-sport.com.au, to notify ANU Sport of the urgent application.
- 3.2.5 Approval will be confirmed via written communication endorsing the request and clearly outlining the terms and conditions of approval, including purpose, intended use, storage period and distribution channels.
- 3.2.6 ANU Sport may refuse or revoke approval at its sole discretion.

3.3 Consent Requirements

- 3.3.1 Once ANU Sport approval is granted, **informed consent** must also be obtained from:
 - 3.3.1.1 each identifiable adult individual; and
 - 3.3.1.2 a parent/guardian for any person under 18.
- 3.3.2 Consent documentation (or event signage for large crowds) must state purpose, intended use, storage period and distribution channels.

3.4 Use & Distribution

- 3.4.1 Recordings may only be used for the purpose stated in the approval letter. Any further or commercial use requires a fresh approval.
- 3.4.2 ANU Sport retains the **non-exclusive right to use the images or likenesses captured during bookings** for its own promotional or commercial purposes unless otherwise agreed in writing.

3.5 Child and Young Person Protection

- 3.5.1 All filming involving children and young people must comply with the **Child Safe Code of Conduct**, including:
 - 3.5.1.1 No images that are suggestive, demeaning or reveal identifying information (e.g., full name + location).
 - 3.5.1.2 Children must be appropriately clothed for the activity.
 - 3.5.1.3 A second adult with appropriate safeguarding checks such as a Working with Vulnerable People card or National Police check should supervise all one-on-one recording sessions.

3.6 Storage, Security & Data Protection

- 3.6.1 Digital files—whether held by ANU Sport or the Hirer—must be:
 - 3.6.1.1 stored securely (password-protected in a cloud server or hard drive or in locked media cabinets),
 - 3.6.1.2 retained only for the approved purpose and retention period, and
 - 3.6.1.3 disposed of safely when no longer required (shredding or secure deletion).

3.7 Prohibited Practices

- 3.7.1 The following are expressly **prohibited**:
 - 3.7.1.1 Filming or photographing without ANU Sport written approval.
 - 3.7.1.2 Using hidden cameras, personal body cams or drones over crowds without approval.
 - 3.7.1.3 Livestreaming on personal social media accounts from within ANU Sport managed facilities.
 - 3.7.1.4 Recording in change rooms, toilets, treatment rooms or any designated private area.
 - 3.7.1.5 Recording children and young people for private collections.

3.8 Third-Party & Facility-Hire Filming

- 3.8.1 Hirers:

- 3.8.1.1 Must obtain written approval **before** bringing photographic, video or audio equipment on site (Conditions §6 “Hirer’s Obligations”).
- 3.8.1.2 Are responsible for ensuring all members, invitees and contractors comply with this policy.
- 3.8.1.3 Must present evidence of public liability insurance and Working with Children / Vulnerable People checks when requested.
- 3.8.2 Media / Commercial Shoots:
 - 3.8.2.1 Require a Facility Hire Application, risk assessment, and proof of insurance.
 - 3.8.2.2 Additional fees, security, or staff supervision may be charged.

3.9 Breaches & Reporting

- 3.9.1 Suspected breaches must be reported immediately to the Duty Manager or the General Manager – Operations.
- 3.9.2 ANU Sport may suspend or ban individuals, terminate a booking, or take legal action for breaches.
- 3.9.3 Where children and / or young people are involved, any breach that raises a safeguarding concern will be managed under the **Safeguarding Children & Young People Policy** (including escalation to external authorities if required).

4. RESPONSIBILITIES

Role	Responsibility
ANU Sport Management	Grant/refuse recording approvals; maintain records; investigate breaches.
Employees & Volunteers	Enforce this policy; report concerns; protect participant privacy.
Hirers / External Contractors	Seek approval; obtain participant consent; comply with all conditions; supervise their personnel.

5. REVIEW

This policy will be reviewed **annually** by the General Manager – Operations, or sooner if legislation, technology or safeguarding standards change.

6. POLICY HISTORY



VERSION	DATE	AUTHOR	UPDATE NOTES
1.0	1/7/2025	Ryan Davies	Original