



Photography and Filming Policy

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1. Purpose

This policy sets out Oriam's approach to photography, filming and video recording carried out on site, including by staff, members, participants, visitors, coaches, clubs, partner organisations, event organisers, the press and media, and Oriam's own CCTV and surveillance systems. It exists to protect the privacy, dignity and safety of everyone who uses the facility — particularly children and other vulnerable groups — while allowing Oriam to promote its activities, support performance and coaching programmes, and meet its legal obligations for security and safeguarding.

2. Scope

This policy applies to all areas of the Oriam building and outdoor grounds, and to all forms of image capture, including still photography, video filming, livestreaming, broadcast production, drone filming, and automated recording via CCTV or performance-analysis camera systems.

It applies to:

- Oriam staff and departments, including marketing, content creation and performance analysis
- Members, casual users, spectators and visitors
- Coaches, sports clubs, national governing bodies, schools and partner organisations
- Event organisers, promoters and third-party hirers of Oriam facilities
- Press, media outlets and broadcasters
- Contractors and volunteers operating cameras or recording equipment on Oriam's behalf

3. Definitions

Photography/filming: the capture of still images, video or audio-visual footage by any device, including phones, cameras, tablets, drones and body-worn cameras.

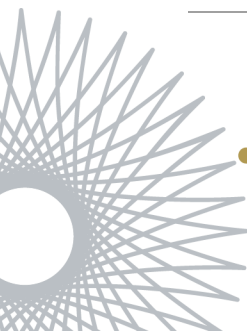
CCTV: Oriam's fixed closed-circuit television and automated surveillance camera systems used for security and safety monitoring.

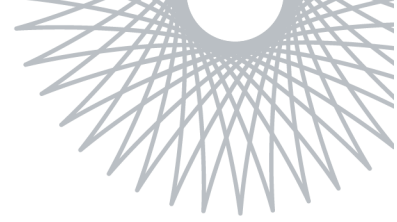
Content creation: photography or filming carried out by or on behalf of Oriam for marketing, social media, promotional or archival purposes.

Child/young person: anyone under the age of 18.

Vulnerable adult: an adult who may be unable to protect themselves from harm or exploitation.

Consent: a freely given, specific, informed and unambiguous indication of agreement to be photographed or filmed and to have that material used in a defined way.





4. Legal and Regulatory Framework

- This policy is informed by, and should be read alongside:
- UK GDPR and the Data Protection Act 2018
- The Protection of Freedoms Act 2012 and the Surveillance Camera Code of Practice
- The Children Act 1989/2004 and Scottish child protection guidance
- The Human Rights Act 1998 (right to respect for private and family life)
- Oriam's Safeguarding and Child Protection Policy
- Oriam's Data Protection Policy
- Any relevant national governing body or partner institution (e.g. Heriot-Watt University) safeguarding and image-use requirements

Where this policy conflicts with a legal requirement or a stricter partner-organisation requirement, the more stringent standard applies.

5. General Principles

- Photography and filming at Oriam must always respect the privacy, dignity and safety of everyone present.
- Images and footage must only be captured and used for a legitimate, clearly identified purpose.
- Additional care and, where required, explicit consent applies to children and vulnerable adults.
- Anyone photographing or filming on site must comply with instructions from Oriam staff, including being asked to stop or to leave a specific area.
- Oriam reserves the right to refuse or withdraw permission for photography or filming at any time, including revoking pre-agreed access, where there is a safeguarding, privacy, security or operational concern.

6. CCTV and Automated Surveillance

Oriam operates CCTV and automated performance-camera systems across the building and grounds for the purposes of health and safety, crime prevention, incident investigation, and (in designated areas only) performance analysis.

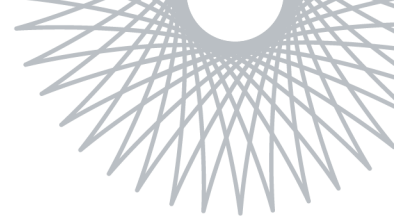
- CCTV is not used in changing rooms, toilets, or other areas where users have a heightened expectation of privacy.
- Access to live and recorded CCTV footage is restricted to authorised staff on a need-to-know basis.
- Footage is retained only for as long as necessary for its stated purpose, in line with Oriam's Data Protection Policy, and is then securely deleted.
- Requests for footage (e.g. by police, an individual under a subject access request, or for an internal incident investigation) are handled in line with UK GDPR and are managed through the main university SafeGuarding Service team.
- Performance-analysis camera systems used within training areas operate under the same access, retention and privacy principles, and coaches/clubs using them are responsible for ensuring participants and, where relevant, parents/carers are aware footage is being captured.

7. Photography and Filming for Marketing and Content Creation

Oriam's marketing and communications team, or photographers/videographers working on Oriam's behalf, may photograph or film within the facility for websites, social media, promotional materials, funding reports and archive purposes.

- Planned content-creation shoots should be notified in advance to Duty Supervisors and, where practical, to affected user groups or bookings.





- Wherever a session, class or match is being filmed primarily for marketing purposes (rather than incidental background footage in a public area), participants should be given the opportunity to opt out or be positioned outside camera coverage.
- Any identifiable content involving children requires the consent set out in Section 11.
- All content-creation photographers/videographers must carry identification and, where working on behalf of Oriam, should be recognisable as such (e.g. lanyard, branded clothing).
- Approved images and footage should be stored on Oriam's designated marketing systems, not on personal devices or personal cloud storage.

8. Photography and Filming by Members, Participants and Visitors

Members and visitors may take personal photographs or videos (e.g. of their own training session, or friends and family) provided this:

- does not include other identifiable individuals without their agreement
- is not carried out in changing rooms, toilets, or other areas set out in Section 13
- does not disrupt other users, coaching sessions, classes or events
- is not for commercial, promotional or resale purposes without prior written permission from Oriam

Staff who observe photography or filming that appears inappropriate, intrusive, or that a bystander objects to should politely ask the individual to stop and, if the behaviour continues or raises a safeguarding concern, escalate to the Duty Supervisor immediately.

9. Photography and Filming by Coaches, Clubs, Schools and Partner Organisations

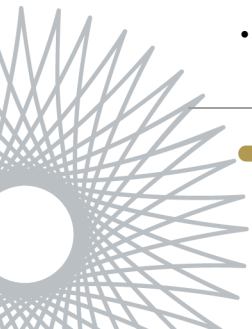
Coaches, clubs, schools, national governing bodies and other partner organisations regularly using Oriam facilities may film for coaching analysis, performance review or their own promotional purposes, subject to the following:

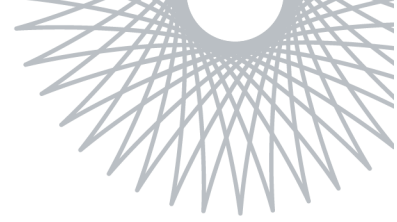
- The organisation must have its own child protection/safeguarding and image-use policy, consistent with this policy, and must make this available to Oriam on request
- Filming for coaching or performance analysis should be limited to participants within that organisation's own session
- Where footage will be used beyond internal coaching analysis (e.g. published externally), the consent requirements in Section 11 apply
- The organisation is responsible for briefing parents/carers and participants that filming will take place
- Oriam may request to see, or be provided with copies of, the organisation's relevant policy and consent records

10. Media, Press and Broadcast Filming

Press, broadcast crews and external media must seek prior written approval from Oriam's marketing/communications team before filming or photographing on site.

- A designated Oriam staff member should be made aware of Press arriving on site
- Areas and activities that may be filmed, and any restrictions (e.g. no filming of specific individuals, sessions or areas), should be agreed and confirmed in writing before the visit
- Press and broadcast access must never include changing rooms, toilets, medical rooms, or any area listed in Section 13 unless a fully private session is taking place
- Where children or vulnerable adults may be filmed, the consent and safeguarding requirements in Sections 8 and 11 apply, and event organisers/clubs are responsible for briefing participants and parents/carers in advance
- Oriam reserves the right to end a press/media visit at any time if these conditions are not met





11. Child Protection — Photography and Filming Involving Under-18s

Additional safeguards apply wherever children may be photographed or filmed, in line with Oriam's Safeguarding and Child Protection Policy.

- Written parental/carer consent (or consent from the young person themselves where they are of sufficient age and understanding) is required before a child is named, or filmed/photographed in an identifiable way, for any external, marketing, press or broadcast use
- Consent must specify how the image will be used and for how long it will be retained; it may be withdrawn at any time
- Children should never be identified by full name alongside their image in external publications; where identification is necessary (e.g. for results or awards), first name and initial only should be used, unless full consent has specifically covered this
- Images should show children appropriately dressed and in appropriate poses, avoiding content that could be misused
- Photography and filming of children must not take place in one-to-one settings without another adult present or aware
- Any concern that photography or filming of a child is inappropriate, unauthorised, or being used to groom or exploit a child must be reported immediately in line with Oriam's Safeguarding and Child Protection Policy and escalated to the Safeguarding Lead

12. Consent

Consent is required before an identifiable individual's image is used for marketing, press, external publication or broadcast purposes, except where the individual is incidentally captured in a wide, general shot of a public area or crowd where they are not a clear focal point.

- Consent should be recorded in writing (including via an approved digital form) and should state the purpose, the channels the image may appear in, and the retention period
- Consent for children must be obtained from a parent or legal guardian, in addition to any consent sought from the child
- Anyone may withdraw consent at any time; on request, Oriam will remove or stop using an identifiable image within a reasonable timeframe, except where already distributed in print or broadcast material that cannot practically be recalled
- Blanket consent obtained at membership sign-up should be reviewed periodically and does not remove the need for specific consent for higher-sensitivity uses (e.g. named case studies, campaign features involving children)

13. Prohibited Areas and Activities

Photography and filming of any kind (including on personal phones) is prohibited in:

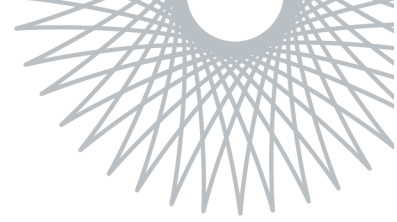
- Changing rooms, showers and toilets
- First aid and medical rooms
- Any area where an individual has a reasonable expectation of privacy
- Areas restricted by a specific booking, event organiser or safeguarding requirement

Anyone found photographing or filming in these areas will be asked to stop and delete the material, and the matter may be escalated as a safeguarding or security incident, including reporting to the police where appropriate.

14. Drones and Unmanned Aerial Vehicles (UAVs)

- Drones may not be flown over or within Oriam's site without prior approval from HWU SafeGuarding Services





- Any approved drone operation must comply with Civil Aviation Authority (CAA) regulations, hold appropriate insurance and, where applicable, an operator/flyer ID
- Drone filming must not capture identifiable images of children or bystanders without the consent requirements in Sections 11 and 12 being met
- A risk assessment must be completed and agreed with Oriam prior to any drone operation on site

15. Social Media and Digital Content

- Content published on Oriam's social media channels must comply with this policy and with the consent requirements set out above
- Staff should only post content via Oriam's official channels, following the organisation's social media and brand guidelines
- Members, coaches and clubs are encouraged to tag or credit Oriam appropriately, but remain individually responsible for ensuring their own posts comply with privacy and consent requirements, particularly where children are visible
- Oriam will remove or request removal of content shared on its official channels where a valid concern or consent withdrawal is raised

16. Data Protection, Storage and Retention

Photographs and video footage are personal data under UK GDPR where an individual is identifiable. Oriam will:

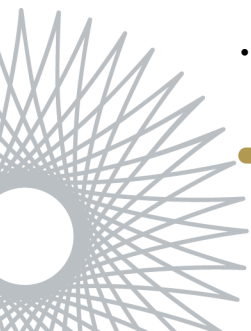
- process images lawfully, fairly and for the specific purpose(s) they were collected for
- store images and footage securely, with access limited to those who need it
- retain marketing and content images only for as long as needed for the purpose agreed with the individual, and CCTV footage in line with the retention schedule in Oriam's Data Protection Policy
- delete or anonymise images and footage once the retention period has expired or consent has been withdrawn
- handle any data breach involving images or footage in line with Oriam's Data Protection Policy, including notification to the Information Commissioner's Office (ICO) where required

17. Requesting Removal or Restriction of Images

Anyone who wishes to withdraw consent, request removal of an image, or object to being photographed or filmed at Oriam should contact the marketing/communications team or Duty Supervisor in the first instance. Requests will be acknowledged promptly and actioned as set out in Section 12.

18. Roles and Responsibilities

- **Oriam Management** — overall ownership of this policy, ensuring adequate signage, systems and staff training are in place.
- **Duty Supervisors** — day-to-day enforcement, responding to concerns or breaches on site, and escalating safeguarding issues.
- **Marketing and Communications Team** — managing content-creation shoots, press/media requests, consent records and official social media content.
- **Safeguarding Lead** — handling any safeguarding concern relating to photography or filming of children or vulnerable adults.
- **Coaches, Clubs and Partner Organisations** — ensuring their own filming activity, and that of their members/participants, complies with this policy.





- **All Staff** — challenging inappropriate photography or filming and reporting concerns promptly.

19. Reporting Breaches and Concerns

Any suspected breach of this policy, inappropriate photography or filming, or safeguarding concern should be reported immediately to the Duty Supervisor Team. Safeguarding concerns involving a child or vulnerable adult must also be reported to the Designated Safeguarding Lead without delay, in line with Oriam's Safeguarding and Child Protection Policy. All reports will be recorded and, where appropriate, referred to the police or other relevant authority.

