

# PHOTOGRAPHY POLICY



IMS Section:

Operations

OPs-POL2

<b>Name of Premises:</b>  All GLL Leisure & Libraries Premises	<b>GLL POLICY</b>  <b>Approved by:</b> Associate Director of Standards and Compliance	<b>Section:</b> OPs-POL2 <b>Page:</b> 2 of 4 <b>Issue:</b> One <b>Date:</b> 1 <sup>st</sup> November 2016
<b>Title: Photography Policy</b>		

## 1.0 Introduction

- 1.1 Managing the use of cameras and other image recording equipment has become more complex in the leisure environment in recent years. Many customers now use smart phones and other devices which are capable of producing high resolution images. National trends have also developed more latterly with the uploading of images to social media, becoming part of everyday life and normal for many.
- 1.2 The potential for misuse of photographs for illicit purposes remains and arguably has increased with the ease of access to these devices. GLL recognise that we are operating in an environment with many family and activity based scenarios or prestigious venues where photography is part of the customer's expectation.
- 1.3 This document is to provide guidance to managers on a wide ranging subject, in establishing a "common sense" approach whilst ensuring the safety of everyone using our facilities.

## 2.0 Scope

- 2.1 **This document applies to all GLL facilities and premises. Managers should take special note of certain premises or divisions where special conditions apply.**

## 3.0 Responsibilities

- 3.1 Managers are responsible for the implementation of this policy and local training of staff.

## 4.0 The Purpose of the Policy

- 4.1 The purpose of the policy is not to create an outright ban. The majority of our customers use our facilities to enjoy themselves and to have a good time with their friends and family. Photography is regarded by the majority of our customers as a harmless act.
- 4.2 The purpose of this policy is to:
  - **Safeguard children and other vulnerable people**
  - **To safeguard privacy**
  - **To set out examples where photography would be appropriate**
  - **To set out examples where photography is inappropriate or is prohibited.**

\*The definition of photography for the purposes of this document is "the recording of still

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or moving images on any device”

## 5.0 Photography without Written Approval

5.1 Managers may experience people taking photographs on a “one off” or casual basis whilst using facilities. This may be in the context of a family, group or social setting taken within a permitted area. In applying this policy managers need to use their judgement, that if they **were** to challenge customers taking photographs that they **can be** satisfied that photographs are being taken within the context of this policy.

5.2 Examples of permitted areas are, but not limited to:

- Groups taking part in the “Extreme Activities”
- Visitors taking photographs of the London Aquatics Centre or other prestigious venues.
- Customers taking “selfies” in the Fitness Areas and posting on Social Media.
- Players and teams at football matches or other team sports.
- A group having a day out at a Lido or park
- General Activity areas
- Social areas and Cafes
- Parks
- Birthday parties
- Concerts, track meetings and other sporting events

5.3 Managers need to be aware of and be attuned to what is clearly harmless activity. Conversely, staff should be aware of abnormal or irregular behaviours.

5.6 Examples of these behaviours could be:

- Lone individuals taking photographs who are not part of a group.
- Individuals who have no connection with either the premises or its activities.
- People displaying non-standard, peculiar or uncharacteristic furtive behaviours

## 6.0 Prohibited Areas

6.1 The following are prohibited areas and photography is **banned completely**:

- All Changing Areas
- Health Suites
- Spas
- Toilets.

Managers should consider if there are others areas within the premises where there is a total exclusion.

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## 7.0 Areas for Extra Vigilance

- 7.1 There may be some areas in a premises that are more sensitive than others, but where photography may conceivably take place.
- 7.2 This could be for example the guardian of a child asking to take a photograph in a crèche.
- 7.3 Other examples of these areas may include:
- Fitness Centres
  - Fitness Class studios
  - Playschemes

## 8.0 Photography with Written Approval

- 8.1 Managers may receive requests to take photographs from other individuals or organisations, these requests may come from:
- Professional organisations such as filmmakers
  - The media
  - Groups, Schools or clubs using the facilities
  - Clients and Partners.
- 8.2 Requests for this type of photography that is more than “casual” should be made in writing to the General Manager. Managers need to understand the nature of the request, for example if this is for group use, or for commercial purposes. A standard template form is available.

Similarly, children / models may be the subject of photography for promotional or media purposes. In all instances a Photography Release is required.

## 9.0 Children’s Centres

- 9.1 No photography is permitted in the Children’s Centres
- 9.2 However special dispensation may be granted for events or specific one to one work. Only the Centre Manager can give this consent
- 9.3 In this instance signed consent forms will be required.
- 9.4 Where images are stored they will be password protected
- 9.5 Staff will not take images on personal devices.
- 9.6 Families are requested not to take images at sessions or events.
- 9.7 Images will be stored for a maximum of 5 years.
- 9.8 If photographs are to be used in case studies the written permission of both the Manager and the individuals concerned is required.