



FINGAL BEACH SURF LIFE SAVING CLUB INCORPORATED
POL-04
PHOTOGRAPHY, IMAGES & DIGITAL RECORDING
POLICY

Policy type	Club Policy — adopted under Constitution Rule 25
SLSA policy basis	This policy adopts and implements SLSA Policy 6.21 Photography, Digital Recording & Images (reviewed June 2025) at Club level. In the event of any inconsistency between this policy and SLSA Policy 6.21, SLSA Policy 6.21 prevails.
Related documents	SLSA Policy 6.21 Photography, Digital Recording & Images; SLSA Policy 6.02 Privacy; POL-01 CCTV Surveillance Policy; POL-03 Social Media Policy; POL-05 Privacy Policy; SD-21 Child Safe Commitment Statement; Constitution Rules 11.2 and 12 (Discipline and Grievances); BL-04 Director Portfolios & Duties
Scope	All Club members, officials, volunteers, contractors, and visitors taking photographs or recordings at Club events, on Club premises, or in connection with Club activities. Does not apply to CCTV surveillance — that is governed by POL-01.
Version	6.0 — 4 August 2026 — ADOPTED by resolution of the Board on 4 August 2026 under Constitution Rule 25. Cover block completed with the adoption and effective dates; status changed from board-ready draft to adopted. No change to the text of the Policy. Supersedes v5. From this version the file is named without a version suffix — the version is recorded here and in the header. Prior note: 5.0 — July 2026 — formatting: sub-headings indented to the house clause style (audit pass). Content verified clean vs SLSA 6.21 (ss. consent/minors/IP; §3 patrol suspicious-photography) — no content change. Supersedes v4.
Adopted by Board	4 August 2026 — by resolution of the Board under Constitution Rule 25
Effective date	4 August 2026 — the date of adoption.

Review date	Annually — within 28 days of the first Board meeting after each AGM, and whenever SLSA Policy 6.21 is updated
Responsible Director	Director of Administration

SLSA Policy 6.21 applies directly to all members

All Fingal Beach SLSC members are SLSA members and are bound by SLSA Policy 6.21 Photography, Digital Recording & Images in their capacity as SLSA members.

This Club policy formally adopts SLSA Policy 6.21 as the Club standard and adds the Club-specific operational requirements that 6.21 does not address at club level: consent management for Club events and the Nippers program, the Club's own use of member images, and member image rights. A copy of SLSA Policy 6.21 is available at members.sls.com.au. CCTV surveillance is not covered by this policy — refer to POL-01.

1. PURPOSE AND SCOPE

- 1.1** This policy sets out the rules for taking, using, storing, and sharing photographs, video, and other digital images in connection with Fingal Beach SLSC activities, events, and premises. It applies to Club members, officials, volunteers, contractors, and visitors.
- 1.2** This policy does not apply to CCTV surveillance recordings. The Club's fixed CCTV system at 3 Marine Drive, Fingal Bay is governed by POL-01 CCTV Surveillance Policy.
- 1.3** The legal framework governing photography in public places, images of minors, criminal offences relating to unauthorised recording, privacy law, copyright, and how members should respond to suspicious photography on patrol are all addressed comprehensively in SLSA Policy 6.21. Members should read that policy directly. This Club policy does not restate those provisions.

2. SLSA POLICY 6.21 — ADOPTED AS CLUB STANDARD

- 2.1** The Board formally adopts SLSA Policy 6.21 Photography, Digital Recording & Images as the Club's standard for all photography, video, and digital recording in connection with Club activities. All members must comply with SLSA Policy 6.21 in full.
- 2.2** The key obligations under SLSA Policy 6.21 that members must be aware of include:
 - wherever an individual's image is to be used, consent should be obtained. Members, when joining and renewing SLSA membership, agree to the SLSA Membership Declaration, which includes consent for the relevant SLS entity to use their name, image, and likeness to promote the objectives of that entity;
 - photographs or video that may be interpreted as offensive, obscene, defamatory, threatening, bullying, discriminatory, hateful, racist, or sexist must not be taken or used in any way;
 - before any photograph or video of a minor is published, posted on social media, or used in Club promotional materials, consent must be obtained from a parent or legal guardian. The SLSA Membership Declaration covers this for current members, but does not cover visitors, spectators, or non-member participants;
 - copyright in a photograph generally belongs to the photographer unless the Club has commissioned or paid for the photography, in which case a written agreement should specify ownership;
 - SLSA intellectual property — including the red and yellow imagery associated with surf lifesaving — must not be used to promote or endorse any product or service without SLSA's prior written authorisation (refer to SLSA Policy 6.01 Intellectual Property); and
 - members who observe suspicious photography at a patrolled beach or Club event should follow the guidance in SLSA Policy 6.21 section 3 — approach calmly if safe to do so, report to police or security if concerned, and record details of the person and their appearance.

3. CONSENT AT CLUB EVENTS AND THE NIPPERS PROGRAM

- 3.1** The Club conducts a range of events, activities, and programs at which photographs and video are routinely taken. The most significant is the Nippers program, which involves children. The Club must have a clear and consistent approach to consent for all such activities.

3.2 SLSA Membership Declaration

When a member joins or renews their SLSA membership, the SLSA Membership Declaration includes consent for the relevant SLS entity to use their name, image, likeness, and performance in any SLS activity to promote the objectives of that entity. This covers current financial members of the Club, including junior members whose parent or guardian has signed on their behalf. The membership declaration consent does not cover:

- visitors, spectators, or community members who are not SLSA members;
- non-member participants in Club programs or events;
- use of images for commercial purposes, paid advertising, or sponsorship activation beyond promoting SLS objectives; or
- use of images by third parties such as media organisations or commercial photographers.

3.3 Additional consent for non-members and visitors

Where the Club intends to photograph or film people who are not SLSA members — including visiting families, spectators at events, or participants in community programs — the Director of Administration must ensure that an appropriate consent process is in place before the event. For events where individual consent is not practical, a prominent written notice at entry points advising attendees that photography and filming will take place is the minimum standard. The SLSA Policy 6.21 Annexure B disclaimer may be used for this purpose.

3.4 Nippers program — specific requirements

The following requirements apply specifically to the Nippers program given the age of participants:

- the Director of Junior Activities is responsible for ensuring that all Nippers parents and guardians are made aware of the Club's photography and image use approach at the start of each season, as part of Nippers registration;
- the SLSA Membership Declaration signed at registration covers the Club's own use of images of Nippers members for promotional purposes; however, parents and guardians must be reminded of this and given the opportunity to raise any concerns or restrictions;
- parents and guardians who are not Club members and who wish to photograph or film their own children during Nippers activities may do so provided they comply with this policy and SLSA Policy 6.21. They must not photograph or film other children without consent from those children's parents or guardians;
- no image that identifies a child by name alongside the image should be posted publicly without explicit consent from the child's parent or guardian;
- the Club will not post images of Nippers on official social media accounts that include information about a child's school, address, suburb, or other personal details (refer to POL-03 Social Media Policy); and
- any concern about inappropriate photography of children at a Nippers activity must be reported immediately to the Director of Junior Activities or the President, who must follow the guidance in SLSA Policy 6.21 section 3 and, where appropriate, notify police.

3.5 Drone and UAV photography

Drone or unmanned aerial vehicle (UAV) photography at Club events, on Club premises, or during Club activities requires the prior written approval of the Director of Administration. Drone operators must comply with CASA regulations, the Workplace Surveillance Act 2005 (NSW) where applicable, and SLSA Policy 6.21. Drone footage of children is subject to the same consent requirements as any other photography of children under this policy.

4. THE CLUB'S OWN USE OF MEMBER IMAGES

4.1 The Club uses photographs and video of members and activities for its own promotional and communication purposes — including the Club website, official social media accounts (see POL-03), annual reports, grant applications, and sponsorship materials.

4.2 Basis for use

The Club's use of images of current financial members is based on the consent given in the SLSA Membership Declaration. This consent is broad but applies to promoting the objects of the Club and SLSA. The Club must not use member images in ways that go beyond those objects — for example to endorse commercial products or services — without obtaining specific written consent. For images of former members, or for any use that may not be covered by the original consent, the Director of Administration must confirm whether the use is appropriate and must obtain additional consent if required.

4.3 Image storage and access

Images taken on behalf of the Club — whether by a Club photographer, a commissioned photographer, or a Director in their official capacity — must be stored securely and accessibly. The Director of Administration is responsible for maintaining a record of where Club image archives are held and who has access. Images that identify individual members, particularly children, must be stored in a way that limits access to authorised persons only. They must not be stored on personal devices or personal cloud accounts without the express approval of the Director of Administration.

4.4 Retention period

Club image archives must be reviewed annually by the Director of Administration. Images that are no longer required for Club purposes must be deleted. Images containing identifiable images of children must be deleted no later than 7 years after they were taken, unless there is a specific documented reason to retain them (such as an ongoing legal matter), consistent with SD-09 Document Retention Schedule. The annual review must be recorded in the Board minutes.

4.5 Commissioned photographers

Where the Club engages a professional or commercial photographer for an event or project, the Director of Administration must ensure a written agreement is in place before the engagement commences. The agreement must specify:

- who retains copyright in the images taken;
- what the images may and may not be used for;
- whether the photographer is required to hold a current Working with Children Check (required if the photography involves direct unsupervised access to children); and
- how images will be stored and when they will be returned to or destroyed by the photographer.

4.6 Member image rights

A member may request that the Club remove or stop using a specific image of them from Club communications or social media. Such requests must be made in writing to the Director of Administration. The Director of Administration must consider the request and, where there is no compelling reason to retain the image in that context, must comply. The Director of Administration must advise the member of the outcome within 14 days of receiving the request. A member's request to have their image removed does not affect images already published in printed materials (such as annual reports) that cannot reasonably be recalled or amended.

5. BREACHES AND DISCIPLINARY PROCESS

5.1 A breach of this policy or of SLSA Policy 6.21 by a Club member is a breach of the Club's By-Laws and may constitute grounds for disciplinary action under the Club's Constitution.

- 5.2** Concerns about a breach of this policy must be reported to the Director of Administration or the President. Concerns involving images of children, or conduct that may be unlawful, must be reported immediately to the President and may require notification to police or to SLSNSW.
- 5.3** The Club's disciplinary process follows Constitution Rule 12. The primary process is the SLSA/SLSNSW grievance, judicial, and discipline process (Rule 12(a)), with the Board retaining residual powers under Rule 12(b). All processes must comply with the natural justice requirements of Rule 12(c). Breaches may also be reported to SLSA via complaints.sls.com.au.

6. REVIEW AND AMENDMENT

- 6.1** This policy must be reviewed by the Board within 28 days of the first Board meeting following each AGM, and immediately whenever SLSA Policy 6.21 is updated. The Director of Administration is responsible for monitoring SLSA policy updates and advising the Board of any changes that require an update to this policy.
- 6.2** The Board may amend this policy by resolution at any time. Any amendment must be recorded in the Board minutes and communicated to members.