The University of Pennsylvania Institutional Animal Care and Use Committee (IACUC) has developed the following policy to specify under what conditions photography and videotaping (henceforth called “images”) are permitted within animal facilities. This policy was created to protect all animals participating on a Penn IACUC-approved study. Unscheduled lights, novel sounds, unfamiliar smells, or non-routine activity can have a significant effect upon animals, potentially altering their physiology, resulting in modifications of research outcomes. Images of histological sections for scientific publication are not under the purview of this policy.

In addition, with the increase in access to and use of social media via mobile phones and other electronic devices, the intent of this policy is to protect the security and privacy of University, the principal investigators/research staff, compliance staff, and ULAR animal care staff from inappropriate photography and videotaping within facilities, while accommodating the scientific needs of those who require photographs or filming for collection of research data.

Per the University of Pennsylvania, Office of University Communications Guidance on Privacy, “how photography and videography (including capturing audio) may be used is highly context sensitive, usually requiring an understanding and evaluation of how public or private the environment is, the individuals are, and the intended use”.

DEFINITIONS

Images: Any photograph or video recording (digital or analog). Image capturing devices include traditional film cameras, traditional video cameras, digital cameras (capable of capturing still images and/or video), computer-mounted video capture units, and mobile cellphone or tablet cameras.

ULAR-managed animal housing facility or vivarium: Any area housing vertebrate experimental animals of any species where ULAR provides at least daily observations for well-being and presence of food and water.

PI-managed animal housing or procedural area: Any laboratory spaces where experimental animals are temporarily or permanently housed, including any laboratory animal procedure and satellite housing areas.

Escort: An authorized individual required to accompany a visitor(s) on any visit to an animal facility. An escort is a Principal Investigator or other laboratory member with experimental animals in the housing or procedural area or a member of the ULAR staff.

RESPONSIBILITY

1) Principal investigator (PI) and staff responsibilities:
   a. Obtain University Communications approval
   b. For ULAR-managed areas:
      i. Notify ULAR veterinary staff in advance to ensure visitors can be present for imaging involving animal subjects.² (request form)
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ii. The ULAR Director or Associate Director for Clinical Care and Training reviews and, if appropriate, approves the request and may assign appropriate ULAR staff to be present.

iii. The ULAR staff’s responsibility is to ensure that scenes are appropriately sensitive to animal care and use issues.

iv. A hard or electronic copy of the approval/disapproval is filed by the ULAR Director’s Administrative Assistant.

2) Designated ULAR veterinary staff is responsible for monitoring experimental animals while image capture occurs within ULAR-managed areas.

3) The PI or laboratory staff is responsible for monitoring experimental animals while image capture occurs within PI-managed areas.

**PROCEDURES**

1) **For research purposes (non-ULAR-managed areas ONLY):** Researchers may require images of experimental animals under study as a component of their research activities. Prior permission from University Communications and ULAR Director or Associate Director of Clinical Care and Training is not needed if the following measures are taken. Images of histological sections for scientific publication are not under the purview of this policy.

   a. For the image capture of live animals, the following must be observed:

      i. Animals have clean surroundings or cages with clean accessories. Water bottles and feeders should be full if visible in the photo.

      ii. Images of animals with visible lesions or visible research alterations (e.g., implants, tumors) should be framed and/or cropped to focus attention on the lesion rather than the animal.

      iii. Every effort will be made to avoid showing identifying landmarks for security purposes (e.g. room numbers, employee name badges/IDs, cage cards).

   b. For images of dead animals, the following must be observed:

      i. The animal should be placed on a clean drape and the area surrounding the animal must be free of any bodily fluids.

      ii. Efforts should be made to document the appearance of a natural or experiment-associated lesion or abnormality seen during the post-mortem examination. Images of abnormalities/lesions should be framed and/or cropped to focus attention on the lesion rather than the animal.

      iii. Again, care should be exercised to prevent extraneous, sensitive information from being captured in the image.

2) **Compliance/external inspectors:** Persons who have a recognized need to visit or inspect animal care activities, such as the USDA, NIH/OLAW, AAALAC, IACUC, EHRS, OAW, or ULAR may capture images as necessary to document conditions or situations. The OAW should be contacted when laboratories are coordinating a visit with an external agency to determine whether the OAW could be of assistance. All images maintained by Penn personnel will be maintained on Penn secure servers or be physically secured.

3) **Visiting faculty, visiting scientists, or prospective employees:** Visitors shall not be permitted to take images in the animal facilities unless the visitor is serving as a photography vendor for the faculty, is accompanied by the PI/PI staff and/or ULAR escort, and complies with the following conditions:

   a. The Director or Associate Director for Clinical Care and Training of ULAR has authorized the taking of images for the documentation of work, and;
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b. Measures are taken to ensure the photographer does not retain an original or copy of such photos and that the rights to the photos belong exclusively to the University of Pennsylvania.

c. Anyone found taking unauthorized photographs/videos will be immediately ushered from the facility.

REFERENCES

1) Penn News | Filming, Photography and Taping Guidelines
2) ULAR SOP 2.2 (Request to Photograph or Videotape Animals or Animal Facilities)
3) USDA Animal Welfare Inspection Guide – Inspection Photographs 2.7