

Photo and Content Permission Policy and Procedures

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Purpose

Ardoch is a national not-for-profit organisation focused on improving educational outcomes for children and young people experiencing disadvantage. Our vision is that every child's potential is realised through full participation in education.

Ardoch seeks to safeguard the safety and wellbeing of children and young people and prevent the risk of exposing them to harm. Ardoch needs to collect images, videos, quotes and stories of its programs to help promote its work to schools, volunteers, funders, and the broader community.

The Photo and Content Permission Policy and Procedure explains how Ardoch collects, uses, and shares photos and content in the course of its work, while recognising and respecting the privacy rights of children and young people involved in Ardoch's programs. By setting out clear guidelines regarding acceptable use of photos and content, Ardoch aims to minimise the risk of harm to children and young people that could occur if their personal information was misused.

Statement of commitment to child safety

Ardoch is committed to the safety and wellbeing of all children and young people. This is the primary focus of our care and decision making. Ardoch has a zero-tolerance approach to all forms of child abuse or harm.

As an organisation, we recognise that all children have a right be to kept safe from harm, and are committed to upholding this moral and legal obligation at all times. Consistent with this,

Ardoch works with its representatives to provide a child safe environment where children and young people are safe and feel safe, and where they are involved in decisions that affect their lives.

Ardoch will also actively promote the safety and wellbeing of particularly vulnerable children, specifically; the cultural safety of Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds; children with a disability, and children and young people who identify as LGBTIQA+.

Every person involved in Ardoch has a responsibility to understand their important and specific role individually and collectively, in ensuring that the wellbeing and safety of all children and young people is at the forefront of all they do and every decision they make.

Scope

This Policy applies to Ardoch employees, Board members, volunteers and contractors.

It applies whether activities are being conducted virtually or in person, including but not limited to in Ardoch offices, partner schools or the workplaces of Ardoch partner organisations.

How Ardoch gathers permission

Photo and content permission

Students (via parents/guardians)

Photo/content permission for students is provided by parents/guardians through the completion of the Ardoch Photo and Content Permission Form in either electronic or physical form. Typically, this form is distributed to and collected from parents/guardians by the staff from the partner school, who then share it with Ardoch.

Permission granted via the Photo and Content Permission Form will usually cover a student for any Ardoch programs during that calendar year. Ardoch will request permission annually, even if permission has already been granted for a student in prior years.

Ardoch surveys for students are anonymised. Therefore, parent/guardian permission for student participation in surveys is not sought. Surveys are distributed to all students who participate in a program. If students are involved in more substantial evaluation or promotional activities, such as focus groups or media coverage, Ardoch will describe and seek specific permission regarding that activity.

Students (themselves)

In addition to parent/guardian consent, Ardoch will seek verbal consent from students themselves, prior to taking photos or videos, allowing them the option to request not to be photographed or videoed if they prefer.

All student surveys outline the intended purpose of the survey and provide students with a clear opportunity to opt-out from participation.

Volunteers

Ardoch volunteers are asked in their volunteer application whether they consent to Ardoch using photos/content involving or created by them. These responses are stored in Ardoch's Salesforce CRM. Volunteers can change their permission decision by contacting Ardoch staff or through the self-serve Volunteer Portal. Ardoch will usually also seek verbal consent from volunteers, prior to taking any photos or videos, allowing them the option to request not to be photographed or videoed if they prefer.

All volunteer surveys outline the intended purpose of the survey and provide volunteers with a clear opportunity to opt-out from participation.

Teachers

Ardoch will seek verbal consent from teachers, prior to taking any photos or videos, allowing them the option to request not to be photographed or videoed if they prefer.

All teacher surveys outline the intended purpose of the survey and provide teachers with a clear opportunity to opt-out from participation.

Permission to participate in Ardoch programs

As participation in Ardoch programs is facilitated almost exclusively via partner schools, Ardoch does not directly collect permission for students to participate in its programs. Schools will typically have their own permission processes. If a child or young person does not have permission to participate in an Ardoch program, Ardoch relies on the partner school ensuring that they do not participate.

In specific cases where students are directly engaging with Ardoch (such as the Youth Advisory Group), Ardoch will seek parent/guardian consent and emergency contact details for participating students. For these cases, Ardoch will enable students who are over 16 years of age to consent to participate themselves and be included in photos, without additionally requiring parent/guardian consent, but will still require emergency contact details of an adult over 18 years of age.

How Ardoch collects photos and content

Permissions and consent will be sought for images where children are identifiable. For images where a child's face cannot be seen (e.g., the photo is taken from behind or the child is obscured in the distance), permissions and consent are not required.

Confirming if students have consent for photos to be taken

Students participating in an Ardoch program where photography is planned will be given a wristband corresponding to their photography consent status (blue meaning parent/guardian consent has been given, red meaning it has not). Photographs and videos are only to be taken of students with blue wristbands. Even students with a blue wristband still have the option themselves to opt-out of photos, regardless of whether parent/guardian consent has been given.

Photos and videos should avoid large group shots and aim to be targeted shots of small numbers of students. This makes it easier to identify students and reduces the likelihood of students without photo permission being accidentally included.

Responsibilities of Ardoch School Partners

Ardoch relies on the support of its partner schools to help maintain the safety and security of children and young people.

Ardoch relies on partner schools to help identify students with and without photo/video permission, using the wristbands, to make this clear to photographers.

Ardoch acknowledges that there may be other circumstances which would make it inappropriate for a child to be photographed and requires partner schools to identify any such children.

Reducing the burden of content collection

To reduce the impact on schools and students, collection of photos, videos and stories will be planned and targeted, to ensure that Ardoch can meet its aims without placing an unnecessary burden on schools, parents, or students. This will involve taking high-quality photos at a smaller number of programs, rather than aiming for photos to be taken at every program. Seeking opportunities that meet multiple criteria for required photos (e.g., program type, student age range or gender, volunteers from a specific partner) will help reduce the overall number of photo sessions required.

For programs where photo content permission forms are not collected by default, the number of programs at which photos or videos are taken should be no more than needed, so as not to unnecessarily require additional administration for parents, teachers and Ardoch staff.

For programs where permission forms are collected by default, the decision as to which to photograph or film will be based on those programs for which there is already a higher number of students with photo and content permission, rather than equivalent programs or classes, where permission will need to be sought for many students.

Guidelines for collecting photos and video content

Volunteers

Ardoch volunteers (including those volunteering on behalf of corporate supporters) are not permitted to take photographs, video, or other recordings of children or young people involved in Ardoch programs on their own devices.

The only exception to this is if the volunteer has been specifically approved by Ardoch to act as a photographer for the event, in which case they will fall under the same guidelines as employees/contractors.

Employees

Ardoch employees are permitted to take photos of programs on cameras or on mobile phones. If the photos are taken on a phone, the photos must be transferred to the Ardoch system within seven days and deleted from the employee's device. The photographs must not be transferred to another device or used for personal purposes.

Contractors (photographers/videographers)

If a contractor (such as a photographer or videographer) has been engaged by Ardoch to take photos at an event, they must be accompanied by an Ardoch employee. This ensures there are always two adults present and enables the employee to support the photographer to only photograph or video students with permission. The photographs must not be used for personal purposes.

Guidelines for collecting quotes, testimonials and stories

Sometimes Ardoch will use quotes, testimonials or stories collected through evaluative data gathering tools (such as surveys or focus groups). Participation in evaluative data-gathering processes is voluntary. Clear information about the purpose of the process, how information will be used, recorded and reported, and the opportunity to opt-out is included in participant information statement for each process.

Parent/guardian permission is not sought for student participation in surveys, as student survey data is anonymised. Where Ardoch collects more detailed information, such as through focus groups, interviews, or case studies, parent/guardian permission will be sought prior to student participation in the data collection.

If quotes, testimonials, or stories are collected outside of an evaluative context (for example unsolicited feedback, a story shared at event, or post-program email from a teacher), Ardoch will seek the person's permission to record and use their words as a quote, testimonial or story. Permission may be collected verbally or by return email confirming the person is happy for Ardoch to use their words to help talk about our work.

Content collected by students or teachers

During programs, Ardoch will not prevent students from taking their own photographs, instead allowing individual schools (and the supervising teachers) to determine if this is appropriate.

Teachers from partner schools may also take their own photos of students or programs. Ardoch will assume that use of these photos will be in line with the relevant school's guidelines.

Ardoch employees and volunteers are not obligated to participate in student or teacher photos. If they want to avoid this, they can remove themselves from the photo or speak to the student/teacher involved and request to not be in the photos.

Collection of content by third parties

From time to time, third parties may seek to create or collect content during Ardoch activities, for that third party's own use (e.g., where the third party wishes to create an in-house corporate video or promote its support of Ardoch activities via its own communication channels). In those circumstances, this Photo and Content Permission Policy and Procedures and the attached Content Permissions Forms may not cover the proposed collection, use or disclosure, and may need to be read in conjunction with any consent form or privacy policy of that third party.

Any third-party requests to collect content for that third party's own purposes should be referred to the Ardoch manager responsible for marketing, for advice on the appropriate steps to take. No third-party collection of content should occur, without prior approval from Ardoch.

Where reasonably practicable, Ardoch will review any content collected by the third party and request the third party not to use or disclose any content that would not be appropriate for the proposed use or disclosure under this Policy and Procedure.

Ardoch may agree to a third party engaging or funding a contractor (e.g., photographer or videographer) on the basis that all content is reviewed and authorised by Ardoch for the third party's use, in line with this Policy and Procedure. Such arrangements must be planned well in advance.

How Ardoch uses photos and content

Conditions on permitted use of photos or content of children

Ardoch will not use photos or content, unless the following conditions are met:

For written content (such as stories and letters)

- Ardoch has received a Photo and Content Permission Form for the author
- If the content relates to correspondence (such as a Buddies program), content permission has been received from the intended recipient
- Any names have been removed from the content or substituted with pseudonyms
- Anything in the content that could reasonably lead others to discern the identity of the author or the recipient has been removed

For audio/visual content (such as photos and video footage)

- Ardoch has received a Photo and Content Permission Form for any clearly visible and identifiable students
- Names of any children or young people appearing in the content are not disclosed with the content (nametags must be blurred/covered if visible)

For quotes/testimonials/stories

- The quote, testimonial or story was collected in accordance with the steps above for appropriate data collection (including the person having provided verbal or written confirmation that they agree to the content being used by Ardoch to talk about its work)
- Any names of children or young people have been removed from the content or substituted with pseudonyms

For fundraising appeals and advertising

- Ardoch will aim to use stock images for public fundraising campaigns. If, for any reason,
 Ardoch wishes to use a child's image for this purpose, it will seek specific permission.
 However, images may be used in publications with multiple purposes (such as a
 newsletter) that also include a request for donations and illustrate the programs that are
 funded with the support of donations and other funding.
- Ardoch may use children's images in other forms of advertising, such as recruiting volunteers. In the event that a child's image is sought for a large-scale campaign (such as a billboard), Ardoch will endeavour to speak to the subject of the image and, for children under 16, their parents/guardians, to seek their additional approval.

Prohibited uses of content

Posting to personal social media platforms

Volunteers, employees and contractors are not permitted to post any photos or videos including children or correspondence to or from a student directly to their personal social media profiles.

Posting content that does not include children directly (such as a photo at the front of the school, volunteer group photo at an event, photo of book created in a program), is encouraged.

If content has been posted on an Ardoch platform, posted by a school partner, published in the media or published by an Ardoch partner (after being authorised by Ardoch), then employees, volunteers and contractors are welcome to share this content.

If a volunteer, employee or contractor thinks that there is an exceptional reason for needing to directly share a photo or video on their personal social media profile, that is aligned with and supportive of Ardoch's purpose and does not create unnecessary risk for the child or young person, they may do so after first obtaining the explicit permission of the Ardoch manager responsible for marketing. Such content still must align with any other requirements relating to content permission and avoid sharing student information such as names.

Disclosing child/student names as part of other content

Student names should not be disclosed with photos or content in any circumstances, unless explicit permission for that purpose has been sought from parents, such as for a news article or an interview.

Demeaning representations

No content should be collected or published that depicts, or appears to depict, a demeaning representation of any child or young person.

Use of Ardoch content by third parties

From time to time, Ardoch may provide content to certain of its partner organisations, such as partner schools, corporate sponsors, and other organisations that support Ardoch's charitable work, for their use. Ardoch will only provide such content where Ardoch considers the third party has a legitimate reason for requesting the content (such as their own promotional material that describes how they have supported Ardoch's charitable work).

Ardoch will only provide such content where the condition it has set for its use have been met and to the extent it considers is reasonably necessary.

From time to time, Ardoch may share content on webpages controlled by Ardoch, such as Ardoch's own website and its profiles/pages on social media websites such as Facebook and LinkedIn. In those circumstances, content may be disclosed to, and become subject to the policies of, the operator of those websites.

Retention and destruction of content and information

Storage of content and permission forms

Images and permission forms will be stored in Ardoch's secure system which can only be accessed by a limited number of authorised individuals.

Duration of usage and planned destruction

Ardoch will only retain content for as long as necessary. Ardoch will aim to use current photos, images and quotes and typically will not use content that is more than five years old, except for the specific purposes of relating to historical events.

After five years (if not sooner), Ardoch will take reasonable steps to either destroy any content that contains personal information or ensure that any personal information is de-identified.

Provided that Ardoch obtained consent in accordance with this Photo and Content Permission Policy and Procedure (or a previous version of this Policy) at the time the content was collected, Ardoch reserves the right to continue to use that content, in accordance with this Policy and Procedure.

Managing requests to cease using certain photos or content

If Ardoch receives a request that it stop using any particular content or becomes aware of circumstances which in Ardoch's view make it inappropriate to continue using that content, Ardoch will take all reasonable steps to remove and avoid further using content previously collected with permission in place, however this may not be possible in all cases.

Ardoch can be contacted by phone at (O3) 9537 2414 or via our website, at www.ardoch.org.au.

Implementation and review

Procedure implementation documents

The following documents are referred to and are to be used when implementing this procedure:

- Privacy Policy
- Child Safety and Wellbeing Policy

- Child Safety Implementation and Reporting Procedure
- Code of Conduct
- Equity, Diversity, and Inclusion Policy
- Volunteer Management Policy.

Implementation responsibilities

The Chief Executive Officer has overall responsibility for driving the policy's implementation, supported by the Executive Leadership Team. The Child Safety Officer, Fundraising & Engagement Manager and Programs Managers all play an important role in implementing the policy and procedures, and effectively balancing the interests of child safety, program delivery, school needs, funder needs and Ardoch communication needs, with priority given to child safety.

Review process and timeframe

The Policy and Procedure, and its implementation, is reviewed bi-annually by the CEO, with input from employees, volunteers, contractors, and other stakeholders.

Version and approval

Version: September 2023

Authorisation: CEO

Approved: November 2023

Appendix 1: Photo and content permission form



Ardoch Photo and Content Permission Form

Dear Parent/Guardian,

Ardoch is an educational charity that supports schools and their students across Australia. This year, your child is participating in one or more of Ardoch's programs to support their education. Ardoch sometimes collects and uses photos, video, and other content from our programs, to support our operations, marketing, and fundraising. Ardoch sometimes also shares (discloses) this content with other parties, such as supporters or program partners.

The purpose of this form is to seek your permission to:

- take photos and videos of your child during our programs
- use photos and videos of your child and other content they create during our programs to support our work.

We do not take photos and videos at all our programs. We will only use the photos, videos and content of students for whom we have permission to do so. We do not identify individual students (i.e., use their names) when we use their photos, videos or content.

Your child can still participate in the program, even if you do not give permission to them being photographed or videoed.

The summary on the back of this form outlines in more detail how Ardoch collects and uses content from our programs. If you have any queries or concerns, please contact your child's teacher at the school, or contact Ardoch directly (contact details overleaf).

Declaration

I give permission for the content (including photos and videos in which my child appears) to be collected, used and shared (disclosed) by Ardoch for publications and public relations activities, in accordance with Ardoch's Photo and Content Permission Policy and Procedure.

To the extent that I or my child own copyright in any such content, I also grant to Ardoch the copyright licence described on the next page.

I have read and understood this notice, and consent to the collection, use and sharing of my child's personal information.

By signing this permission form, I give Ardoch permission to collect, use and disclose the content, for the purposes set out above.

Student name:	School name:
Parent/guardian's signature:	Date:
Parent/guardian's name:	
Parent/guardian's email:	

For more information about Ardoch's use of photos and content, and the details of the copyright licence you are granting to Ardoch, please see next page.

Ardoch's use of photos and content

Ardoch Limited (ABN 48 119 813 188) ("Ardoch") is a children's education charity focused on improving educational outcomes for children and young people in disadvantaged communities. Our vision is that every child's potential is realised through full participation in education.

Ardoch produces publications, and runs fundraising campaigns from time to time, for the purposes of:

- publicising the programs and services of the organisation independently and in conjunction with other agencies;
- informing stakeholders of changes and events in Ardoch's areas of work;
- familiarising the public with the role and purpose of Ardoch.

Achieving these purposes involves the production and distribution of promotional material (which may involve reproducing, adapting, publishing, and communicating to the public the content) through such media as:

- In physical or electronic Ardoch documents, such as annual reports, funder reports, posters and brochures, training resources, program activity booklets.
- In external publications, such as newspapers, magazines, and blogs, or in television, radio or streaming segments.
- Ardoch marketing and fundraising.
- On Ardoch websites and/or social media platforms, such as YouTube, Facebook, and LinkedIn.
- In physical or electronic correspondence sent by Ardoch to people who may be interested in supporting the organisation.
- Occasionally, and only with Ardoch's prior permission, in publications by Ardoch's partner organisations (such as corporate or philanthropic funder), for use by those organisations for similar purposes.

Ardoch will never use any content that depicts, or appears to depict, a demeaning representation of any child or young person.

Before Ardoch publishes or shares any photos, videos, or letters/blogs (written by, or addressed to, your child) Ardoch will remove your child's name (or substitute their real name with a fake name).

Further details of the way in which Ardoch collects, uses, and shares (discloses) Content are contained within Ardoch's Photo and Content Permissions Policy and Procedures, which can be here: https://www.ardoch.org.au/wp-content/uploads/ChildSafety/PhotoContentPermissionPolicy.pdf

Copyright

In order to use content for the purposes set out in this Photo and Content Permission Form and in Ardoch's Photo and Content Permission Policy and Procedure, Ardoch may require a copyright licence from you, on behalf of your child.

By signing this form, to the extent that you or your child own copyright in any such content, you grant to Ardoch a worldwide, royalty-free, sub-licensable and irrevocable licence to all of the intellectual property rights in any such content (including the right to reproduce, publish, adapt, communicate to the public, and cause the content to be seen in public).

Contact Ardoch

If you have any questions about this permission form, or about Ardoch's programs more generally, please contact us at: (03) 9537 2414 or via our website, at www.ardoch.org.au.

If you or your child have any child safety related concerns about an Ardoch program, you can contact our Child Safety Officer on (O3) 9537 2414 or by email at: childsafety@ardoch.org.au