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StudyBeyondBorders Organisation

POLICY

IMAGE POLICY



Table of Contents

Images Policy.....	3
1. Introduction	3
2. Document Purpose	3
3. Assessment of Risk	4
5. Policy	5
6. Implementation	7
7. Policy Management	10
APPENDIX A - Child Photo Consent Form	11
APPENDIX B - Photography/Videography of adults	13



1. INTRODUCTION

StudyBeyondBorders in Cambodia (SBBC) is a local Cambodian non-government organisation operating in rural areas of Battambang and Siem Reap Provinces. The organisation is supported by an alliance of registered development organisations in Australia (SBBA), the UK (SBBUK), and Ireland (SBBI). Our mission is to enable quality teaching and learning for Cambodian children at school.

SBBC's staff, volunteers and program participants work in schools with teachers and children therefore it is imperative that the organisations have a clearly defined [Child and Vulnerable People Protection Policy](#), a [Safeguarding Policy](#) and effective procedures that govern SBBC's engagements.

2. DOCUMENT PURPOSE

SBBC produces digital and print publications for the purposes of publicising its work, fundraising and advocacy. Promotional material is produced and distributed through various media such as:

- Internal sites, including the SeeBeyondBorders.org website
- Official social media platforms such as YouTube, Facebook, LinkedIn, Instagram and X (formerly Twitter)
- External publications such as newspapers and magazines
- SBBC's publications, such as Annual Reports and the Strategic Plan
- Posters or flyers in hard and soft copy
- Reports and proposals related to fundraising and donor reporting.

The purpose of this policy is to ensure the collection and use of photographs and/or film (images):

- Protects the personal information of individuals
- Protects the identity of children
- Presents all subjects (whether children, other vulnerable people, or adults) in a dignified and respectful manner and not in a vulnerable or submissive manner
- Respect the individual's right to control how and for what purpose their personal information is displayed.

In preparing this policy, the [Australian DFAT' Consent for use of images and videos policy](#) has been used as a guide as well as the [Dochas Code of Conduct on Images and Messages](#), we have also taken into account the guiding principles of the SBBC's [Code of Conduct](#).

This policy should be read in conjunction with SBBC's [Child Protection and Vulnerable People Protection Policy](#), [Safeguarding Policy](#) and [Communications Policy](#).

3. ASSESSMENT OF RISK

SBBC recognises that there are a number of risks inherent in using images of children on social media and other publicly available publications. These risks include the risks that a child's rights to protection, privacy and dignity are infringed; the risk that social media images are misused or used in the publications of child exploitation material; the risk that the child is abused by the photographer; the risk that a child is located by an offender because their identity is not protected in the image; and the risk that the child suffers retribution or punishment because their identity is not protected.

We take these risks extremely seriously and have put a variety of mitigation strategies in place, which are outlined in more detail in this policy. This includes ensuring images portray children in a dignified and respectable way; training SBBC personnel; obtaining informed consent; carrying out robust recruitment procedures; and concealing identities and locations.

These risks are covered in SBBC's organisational risk register with the 'use of images' rated as a High Risk and therefore discussed at Board level on a regular basis.

4. DEFINITIONS

Child/children: In accordance with the [United Nations Convention on the Rights of the Child \(1989\)](#), SBBC defines a child as any person below the age of 18 years, regardless of local laws or other definitions.

Vulnerable person: In accordance with the Australia Working with Vulnerable People Act (2011), SBBC defines a vulnerable person as someone who is disadvantaged. For example, through a physical or mental disability; social or financial hardship.

Image: Includes photographs and videos, in print and digital form recorded using a camera, mobile phone or video.

Parent/guardian: Means the biological parent or the person legally responsible for the care of a person under the age of 18 years.

Informed consent: In relation to this policy, informed consent means that an individual has given written consent to the taking and use of images of themselves, or in the case of a child a parent/guardian has given written consent to the taking and use of images of their child based upon appreciation and understanding of how those images will be used by SBBC. In addition, we will also seek verbal consent from the child/children themselves wherever possible.

Publication: The act or process of presenting or reproducing material in print or electronic form that is made available to the public.

Code of Conduct: A document that sets out how SBBC expects staff, volunteers, program participants and visitors to conduct themselves both professionally and personally. It includes a specific reference to this Images Policy. All SBBC' staff, volunteers, program participants and visitors are required to sign a [Code of Conduct](#) declaration, confirming (in part) they "have read, understand and will abide by SBBC' Child Protection Policy and Images Policy".

5. POLICY

To protect the person with whom is involved, children and vulnerable people in particular, SBBC will:

- I. Ensure that when photographing, filming, or publishing images of any individual, children or vulnerable people in particular:
 - Local traditions or restrictions for reproducing personal images are adhered to before photographing or filming.
 - Informed consent is obtained in writing before photographing or filming including an explanation of how the photograph or film will be used. This process will be conducted in Khmer. Communication will be adapted for those with sensory (eg, hearing or sight) disabilities.
 - All publications present all subjects, especially children in a dignified and respectful manner, in accordance with local cultural and religious customs and not in a vulnerable or submissive manner, and that any children are fully clothed with shoulders covered and not in poses that could be seen as sexually suggestive.
 - Images honestly represent and convey the context and complexity of the situations in which they are taken.
 - File labels, meta data and text descriptions do not reveal identifying information about a child or vulnerable person when sending images electronically or publishing images in any

form. This includes full names, names of schools, specific geographical location details and any other information that may enable a third party to identify and locate a specific person as a result of SBBC publication. We will appoint selected members of the SBBC team with cross reference access to the library of photographs and the informed consent for images before publications.

- Guidelines in Appendix B of this policy are followed for photography/videography of adults.
- II. Require all staff, volunteers, contractors and visitors to read and understand the Images Policy, and understand that they may be the subject of photos or videos during their association with SBBC (if they have given consent) and to sign and adhere to SBBC' Code of Conduct.
- III. Provide all staff and volunteers with training on this policy, (in conjunction with training in our Safeguarding, Child Protection and Inclusion Policies), and guidelines (in Khmer and English) on how to obtain informed consent, how to record and store images, and how images can be published.
- IV. Ensure there is a dedicated staff member (system administrator) who is in charge of maintaining the storage of images and the codifying of images with written consent on a specific register. Access to this register is restricted so as only a limited number of staff designated by the Engagement Manager have access to photographs of children with their names.
- V. Not allow external photographers to be unsupervised or with access to individual children.
- VI. Ensure any individuals or organisations working with SBBC on school-based programs (including professional photographers) are aware of our Images Policy, and require them to sign and adhere to SBBC' Code of Conduct.
- VII. Ensure there is no identifying personal information accompanying published photographs of children and vulnerable people, such as names of children, or personal identifiers.
- VIII. Only use images that are relevant to SBBC activities, such as children participating in an activity specifically associated with SBBC' programs.
- IX. Obtain permission from parents/guardians in writing, (and where practical, verbally from the child) before photographs and/or film are taken, clearly outlining the purpose of using the image and how it is to be used and for how long (this includes informing the permission giver that if the consent covers publication on the internet that even if the image is removed by SBB there is a risk that the image may still be available). Should the parent/guardian be unable to read, write or understand the form due to illiteracy or sensory disabilities for example, a representative of SBBC must read and explain the form in person to the parent/guardian

before asking the parent/guardian to indicate their consent by signing the form or providing a thumb print if they are not able to sign their name.

- X. Provide all subjects (and parents/guardians) with the option to withhold or withdraw consent for images to be taken or published. Consent for images to be taken or published of students must be renewed each academic year. Make it clear that there will be no negative repercussions from denying or later withdrawing consent.
- XI. Obtain consent from parents/guardians in writing, (and where practical, verbally from the child) to the publication of images that show the child in a group situation (where identifiable) such as a classroom or playground.
- XII. Not make any payments or any other form of compensation to subjects, or in the case of children, their parents/guardians in exchange for their photograph or video being taken or published.
- XIII. Not use images of children from commercial or other sources for which there is no documented informed consent from the child's parents/guardians, or from the child. This does not include the sharing of articles from reputable publications where it would be reasonable to assume consent was received for images and where it would not be practical for SBBC to be in receipt of documented informed consent.
- XIV. Only publish images or videos that have been approved by the Managing Director of SBBC for locally focused media and the CEO of International Operations for international focused media.

6. IMPLEMENTATION

Image Guidelines

1. These guidelines apply to the use of any images of children, whether published electronically or in print, where a child may be identified, either from facial features, or by association (location, clothing, personal items, etc).
2. No image of a child (unless the child is not easily identifiable) is to be published (online or in print) without **documented informed consent** being obtained in advance from the parent/guardian in writing, (and where practical, verbally from the child) of any child involved.
3. Consent will be obtained before the photograph/film is taken.
4. If a child or vulnerable person becomes distressed at any time when their photograph/film is being taken, even if informed consent has been granted, the photographer/videographer will cease and will ensure the person is comfortable before resuming and/or ceasing to gather



content entirely. Any photographs or videos that have been taken when a person has become distressed will not be destroyed for a minimum of five years. The photographs or video will be filed in a different secure folder and labeled appropriately for easy retrieval.

5. Obtaining informed consent involves the following:

- a. A permission form (Appendix A attached) is to be provided in Khmer to the parent/guardian of every child being photographed.
- b. The form must provide details about the nature of the photograph to be taken and how the photo/video is to be used (publications, social media, etc).
- c. SBBC' staff must explain verbally or in writing that images published online can be removed by SBBC, but this does not mean they are necessarily removed completely and there is a risk they will remain there in the future.
- d. The parent/guardian should be asked to sign and date the form. If the child has given verbal approval (where practical), that should be noted on the form and signed by a representative of SBBC and another adult known to the child i.e teacher or school principal.
- e. Should the parent/guardian be unable to read, write or understand the form due to illiteracy or sensory disabilities for example, a representative of SBBC must read and explain the form in person to the parent/guardian before asking the parent/guardian to indicate their consent by signing the form, or providing a thumb print if they are not able to sign their name.
- f. Contact details for SBBC will be provided to all parent/guardian signatories to keep after they have signed the consent form. These contact details will provide the parent/guardian with the right to withdraw permission at any time by contacting SBBC.
- g. School Principals will also be asked whether there are particular children that should always be excluded from group photographs for confidentiality reasons, and to identify them. This information will be kept confidential and it will not be for SBBC to determine why the Principal has made such a determination.
- h. With agreement from school principals selected schools will include SBBC' photo permission consent form when providing parents/guardians with the enrollment documentation at the beginning of the school year. Parents /guardians will be informed that they can opt-out from providing permission.

6. Each set of images involving an identifiable child or vulnerable person (including in group situations) must have a documented consent form, and a register will be maintained by the

system administrator to enable cross-referencing of images with the relevant consent form. Access to this register is restricted so as only a limited and controlled number of staff designated by the Managing Director of SBBC have access to photographs of children with their names.

Collection and Maintenance of Personal Data

SBBC is identified as a Data Processor, our collection and management of personal data is guided by regulations and data storage standards of our alliance member countries. We are in compliance with the [Australian NGO Accreditation Guidance Manual](#), we also incorporate the General Data Protection Regulations of Ireland and the UK into our approach to data collection, storage and maintenance. This means we are transparent about how and where we store data relating to the communities we work with. SBBC will adhere to the below listed principles and ensure personal data is collected in accordance with SBB' Privacy Policy and that:

- Data is processed lawfully, fairly and transparently
- Data is processed for a specific, explicit and legitimate purpose
- Data is accurate and kept up to date
- Data is not kept longer than necessary for the purpose.

In order to demonstrate that we have consent to use images it is essential that SBBC maintains relevant personal data. This personal data will be kept for five years after which the data and associated images will be destroyed.

Treatment of existing images:

1. SBBC currently has a large library of images that are retained for program documentation. These images are stored securely, and only authorised staff have access to these images as designated by the Managing Director and Engagement Manager.
2. To minimise any potential child protection risk arising from publication of historic library photos, SBBC will not publish any images of children without recorded written consent.
3. All images published by SBBC, including in social media, will comply with this policy.
4. The ethical decision making committee will review any images that need to be considered from an ethical viewpoint. This committee is composed of those who work on a day to day basis in our Engagement team or are engaged in the decision making process. They are the Engagement Manager, the Engagement Officer, the Child Protection Officer and the CEO of

International Operations. Additional roles include regional liaison which will fall under the CEO of International Operations responsibilities, and situation specific support from the Program Support Advisor. No images that raise ethical considerations shall be published without having first been approved by this committee.

5. Although staff, volunteers and visitors will be briefed on this policy and asked to sign the Code of Conduct that they will abide by this, SBBC recognises that with the rise of social media, there is still a risk that images will be published against this policy.
 - a. In such cases involving existing staff and volunteers, action will be taken using SBBC Code of Conduct and the staff member/volunteer will be requested to remove the image from where it has been published.
 - b. In cases involving previous staff and volunteers, SBBC will write to the person who has published the image and request they remove it from publication.
 - c. In cases involving visitors, SBBC will write to the person who has published the image and request they remove it from publication.

7. POLICY MANAGEMENT

All policy will include the following policy management statement and policy management table at the end of the document and the the approving minutes will be used as approval evidence:

This policy has been approved by the General Manager Shared Services and the Managing Director of SBBC as noted below.

Amendments will be recommended to the Managing Director from time to time as deemed appropriate by the General Manager Shared Services, usually annually. Formal reviews are recommended every three years from the anniversary date of approval by the Managing Director. Recommendations for minor changes can be approved by the General Manager Shared Services before the Managing Director review every three years.

This policy and any amendments have also been reviewed by the SBBC Board, as noted below.

Doc Ref	Doc Type	GM-Shared Services	Managing Director	Board Review	Minute Ref
IMGP/05/2025/V1.0	Policy	Approved/20250516	Approved/20250615		Email

APPENDIX A - Child Photo Consent Form

Name of Child: _____	
School Name: _____	District: _____
Initial Purpose of photography/filming: _____	
Date: _____	

SBBC recognises the need to ensure the welfare and safety of all children taking part in any activity associated with our organisation. In accordance with our images policy we will not permit photographs, videos or other images of children and young people to be taken without the consent of the parents/guardians (and where practical, the child). When we publish photos/videos identifying details such as names of individuals/schools and information that could be used to locate said individuals to protect their anonymity and privacy will not be used.

We would like to ask for your consent to take photographs/videos of your child as outlined above.

It is likely these images may be used as/in:

- A record of the activity or the event
- In a written evaluation report of the activity or event
- Publicity for SBBC' activities or events on leaflets/posters
- Publicity material for magazines/books
- SBBC' and SBB partners' websites and social media sites (YouTube, LinkedIn, Instagram Facebook, X)
- SBB Alliance entities publications separate but directly aligned to SBBC
- Illustrations of the activities or events in published articles
- Future donor/funding applications or reports to donor organisations

These photos may be published online, and distributed to various people and organisations around the world, and even if removed by SBBC, may continue, due to the nature of the World Wide Web, to exist in perpetuity.

I have read and understand this notice and **consent to / do not consent to** the collection and use of my child's image, as outlined above (ensure a tick is placed next to each item that consent is given for).

I understand I can withdraw this consent at any time by contacting SBBC (details below)

Name of parent/guardian: _____

Signature of parent/guardian: _____ Date: _____



Name of SBBC staff member: _____ Role: _____

Signed on behalf of SBBC: _____ Date: _____

Where applicable

Name of Witness: _____ Relationship to child: _____

Signature of Witness: _____ Date: _____

Contact SBBC Tel: (+855) 76 66 66 011 Email: info@seebeyondborders.org

APPENDIX B - Photography/Videography of adults

Compliance with our international partner organisations local guidance including the [Australian NGO Accreditation Guidance Manual](#), is key to our understanding of the way in which we handle images of people involved in projects. As stated previously in this policy document we also follow GDPR guidance to ensure the utmost care is taken in the recording and storing of media to ensure the anonymity of individuals is kept to the best of our ability.

In general we do not go to quite the same lengths to protect the identity of adults included in our photographs as we do for children when these photographs or videos are used in our communications. However there are circumstances where we would take the same precautions and in all instances we do ensure that we obtain written consent, we preserve the dignity and values of any subjects in our pictures or other communications material and we show them in an appropriate and representative context. We do also ensure that as far as possible we provide opportunities for individuals to understand the way any images are used and opt to not appear in any of our material so that they can preserve the level of privacy they deem appropriate to their circumstances.

Specific actions taken are as follows:

For Teachers and other Education Authority Officials:

We have specific signed agreements with teachers and schools that we work with, these include a statement that provides consent to SBBC to take and publish photographs that may include them or an employee of the Ministry of Education carrying out their education role in an appropriate manner within the school or other education related gatherings.

Events including those where community members or other adults not employed by the Ministry of Education may attend:

We advise participants at the start of the event that photographs will be taken and ask individuals to make it known to the photographer if they do not want to be included in any published pictures.

Community members:

Where we ask community members for comment or to provide a story which is accompanied by a photograph, we ask for their specific consent to the publication of their responses and or photograph. For community members who are over the age of 18 and are not recognised as members of vulnerable groups, written consent is not necessary, instead verbal consent is required. SBBC staff/volunteers are still required to inform said adult members of the community about the full extent to which gathered media will be used in SBBC' published content. Often community members are vulnerable people and special care is taken not to be exploitative in any way with the pictures or videos we may use.

In all cases prior to publication:

All communications go through a thorough review process before they are published. Communications staff are trained on how to determine whether a photograph is contextually appropriate and how to preserve the dignity and values of the subject. No communication can be published without the approval of the Engagement Manager and the EDMF Committee in specific circumstances for a local publication, for international publications the CEO International Operations should be consulted. No teaching aid or resource can be published without the prior approval from the SBBC Senior Leadership Team.