



# Media Capture and Usage Policy

## I. Introduction

At Development Consortium (DC), we recognize the responsibility of capturing and using media, particularly when it involves children and vulnerable individuals. This policy aims to ensure that all media capture and usage align with ethical standards, data protection laws, child protection regulations, and our organizational values of empathy, dignity, and trust. Our work spans diverse projects related to education, health, and mental well-being within schools and communities.

This policy outlines principles, guidelines, and procedures to ensure responsible media usage across various platforms, including reports, social media, websites, and donor communications.

## II. Definitions

**Media:** Refers to all forms of recorded visual, audio, or written content, including but not limited to photographs, videos, audio recordings, and any other content that may capture the likeness, voice, or identifiable information of individuals involved in DC's activities.

**Minor:** Any individual under the age of 18 years, as defined by child protection laws in India.

**Informed Consent:** Written or documented authorization provided by an individual, their legal guardian, or an authorized representative, acknowledging an understanding of the purpose, scope, and usage duration of any media capturing their likeness, voice, or personal information.

**Third Parties:** External entities, such as agencies, donors, contractors, or other non-DC organizations, that may be involved in capturing, using, or distributing media on behalf of or in partnership with DC.

**Anonymity and Confidentiality:** Practices ensuring that personal information (such as names, locations, and identifiable visual features) of individuals, especially minors, is protected from public disclosure unless explicit consent is granted.

**Vulnerable Children:** Children who are at higher risk of harm, including but not limited to those who are victims of abuse, neglect, exploitation, disability, or any form of trauma. Special precautions must be taken when capturing or using media involving vulnerable children, ensuring their identity is protected and dignity maintained.

### III. Scope

This policy applies to all DC team members, volunteers, contractors, and partners involved in capturing or using media in connection with DC's projects. It covers media captured at schools, community centers, events, and other locations where DC is active.

### IV. Why Are We Doing This?

**1. Legal Compliance:** This policy ensures compliance with various data protection and child safeguarding regulations, including the EU's General Data Protection Regulation (GDPR), India's Digital Personal Data Protection Act, 2023, and the Information Technology Act, 2000, which governs the secure electronic storage and management of media. It also aligns with the child safeguarding laws of India, requiring us to prioritize the privacy, safety, and rights of all individuals particularly minors and vulnerable children, in any media captured or used by DC.

**2. Child Safety:** DC's projects are mostly focused on minors, protecting children from harm, exploitation, or unauthorized use of their images is our priority. We must adhere to DC's Child Safeguarding Policy to ensure dignity and safety of children.

**3. Building Trust:** By valuing the consent of individuals, parents, schools and children we not only ensure legal compliance but we also maintain transparency within the communities we serve, building trust and long-term relationships.

**4. Reputation:** Misusing or mishandling personal data (such as photos) can harm our organization's reputation and impact future projects.

**5. Ethical Responsibility:** Protecting individuals and children from harm and ensuring dignity in all media content is not only a legal obligation but an ethical one that builds trust with the communities we serve.

### V. Principles for Media Capture and Usage

**1. Informed Consent:** No photographs or videos shall be taken without the explicit consent of the individuals involved or, in the case of minors, their guardians (parents, teachers, or school principals). Consent must be obtained in writing using the forms provided in this policy.

**2. Do No Harm:** Ensure that all media captures uphold the dignity of the individuals involved. Avoid any images or footage that could reinforce negative stereotypes or misrepresent the individuals involved. It is important that we follow ethical and safe measures to capture media especially while dealing with children:

- **Be mindful of the child's dignity and emotional well-being**, and never put a camera in a child's face or overcrowd children while they are being photographed. We must always ask ourselves, "What if this were my child?".
- **No media capture will be allowed** if a child is in a compromising or vulnerable position, including but not limited to situations of physical distress, mental trauma, or any setting that could endanger their dignity. Pay attention to the **location and setting** of interviews, ensuring children are not in distressing or inappropriate environments.
- **Parents, guardians, or authorized representatives must be provided with detailed information** on where, how, and for how long the media will be used.
- **For children over the age of 12**, their verbal assent should be sought in addition to parental consent, to respect their personal autonomy.
- **Limit the number of interviewers or photographers** around children to prevent overwhelming them. Children must feel comfortable and should never be pressured to provide interviews or photos.
- **Special care must be taken when capturing images of vulnerable children.** We are committed to protecting children from harm and ensuring their well-being during any media capture. This means:
  - **Images or videos that reveal the identity of vulnerable children** (such as victims of abuse or exploitation) will only be used after taking special protective measures, such as blurring faces or using pseudonyms.
  - Avoiding questions, attitudes, or comments that are judgmental, insensitive to cultural values, or that could place a child in danger, expose them to humiliation, or reactivate pain and grief from traumatic events.
  - Ensuring that children are never put in a situation that makes them uncomfortable, physically or emotionally.
  - We must not discriminate when choosing children to feature in media based on sex, race, age, religion, status, educational background, or physical abilities. Every child has the right to be represented fairly and respectfully.

**3. Anonymity and Confidentiality:** The names and visual identities of children/individuals involved in sensitive contexts must be altered or obscured unless explicit consent is provided.

**4. Empathy and Respect:** Empathy should be at the core of all media-related activities. Respect the privacy and space of everyone involved, allowing them to settle into their environment before asking for media capture. Avoid media capture if an individual/child has just experienced a traumatic event or is in a state of distress.

**5. Truthful Representation:** Photographs and videos should reflect real events and avoid staging stories or asking individuals to enact a scene that is not part of their reality. Ensure that media content truthfully represents the people and situations involved without exaggeration or distortion.

**6. Respect Privacy:** Do not intrude into personal spaces or moments that could cause distress or embarrassment. Maintain an appropriate distance and avoid overly personal or invasive shots.

## **VI. How Will You Do It? (Procedure for DC Team Members)**

**1. Obtaining Consent:** Prior to capturing any media, ensure a signed consent form is obtained from each individual whose image or likeness may be captured. For minors, this consent must be provided by a parent or legal guardian.

**2. Consent for Children in Schools:** Before any media is captured within school settings, secure a signed Consent Form (for school students) from the school principal or an authorized representative. This form will cover all students participating in the program. Additionally, provide the school with a Project Information Form, ensuring they fully understand the objectives and intended use of the media within the project.

**3. Parental Notification:** Ensure the school has notified parents or guardians about the media capture through their own communication channels (such as circulars or notices). DC team members should confirm that this step has been completed and should ensure a copy of such a notification/circular is kept in our records along with the consent form for the purposes of documentation.

**4. Respect Opt-Outs:** Some parents may choose to opt their children out of media capture, parents may do so by either informing the school authority or by informing the point of contact from DC. If any child is opted out, it is important that no photographs or videos of them are taken. Ensure that you are aware of which students have opted out before the session begins.

**5. Follow Safeguarding Guidelines:** Adhere to DC's child safeguarding standards when capturing media. Ensure that the dignity of the children is respected. Avoid inappropriate images or details that could identify the children (e.g., names, locations) unless consent is specifically provided as listed in the principles above.

**6. Secure Data Retention and Disposal:** Ensure that all media is securely stored and accessed only by authorized personnel, adhering to data protection rules to prevent misuse. Media should be stored securely for a period of 7 years after the event and will be permanently deleted afterward unless continued use is expressly permitted by the guardian. Only authorized personnel will have access to media files, and they will be stored in folders with limited access to ensure protection against unauthorized access.

**7. For Clarification:** For any questions regarding media capture and usage, team members are encouraged to contact the legal and compliance team at [legal@devcons.org](mailto:legal@devcons.org).

## VII. Media Usage

All media content captured by DC or its representatives will be used for the following purposes:

### A. Internal Use

- Media may be used internally in team presentations, workshops, newsletters, and training materials designed solely for DC personnel, partners, and affiliates.
- Media can be included in presentations for beneficiaries, parents, teachers, or school authorities when intended solely for informational purposes.

### B. External Use

- Media can be used on DC's social media platforms, brochures, flyers, and notebooks to raise awareness.
- Media from specific programs, such as mental well-being campaigns or health camps, may be used on standees, banners, or other promotional materials to promote program participation.
- Media may be included in donor communications, including reports, to showcase DC's work.

### C. Use by Third Parties

- Third-party agencies hired by DC may use media only for the specific purposes outlined in their contract with DC.
- DC will ensure that these agencies adhere strictly to this Media Capture and Usage Policy, as well as DC's Child Safeguarding Policy, throughout their engagement.
- Media shared with donors will be limited to specific, consent-approved content for reporting or promotional purposes and will follow the guidelines for ethical usage outlined in this policy.

Any media used in these contexts will be handled in line with the ethical principles outlined in this policy.

## VIII. Withdrawal of Consent

If any individual, parent, guardian, or school wishes to withdraw consent for media use, they may do so by providing written notification to DC at [info@devcons.org](mailto:info@devcons.org), more information with regards to content on DC's website can be found in [DC's Privacy Policy](#) and [disclaimer](#). Upon receiving a withdrawal request:

- DC will take steps to cease future usage and remove media from circulation as far as practically possible.
- Any stored copies of the media will be securely deleted within a reasonable timeframe following the withdrawal request.

## **IX. Reporting Concerns**

Any concerns or breaches related to the media usage policy can be reported to [\*\*grievance@devcons.org\*\*](mailto:grievance@devcons.org). Complaints will be addressed within a defined timeline, and corrective actions will be taken as necessary.

## **X. Policy Review and Training**

This policy will be reviewed annually or as necessary to reflect the evolving legal and ethical standards in media usage and child protection. DC will provide mandatory training on this policy to all team members, volunteers, and contractors, ensuring everyone understands the principles, procedures, and responsibilities outlined in this document.



**REGISTERED UNDER SOCIETIES REGISTRATION ACT, 1860**  
**REGISTRATION NO: S-57363/2006**

Education • Health • Gender  
Youth Empowerment • Diversity & Inclusion

