



## ETHICAL IMAGES POLICY

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## 1. SCOPE AND PURPOSE

Reaffirming the organisational and behavioural principles, commitments and obligations set out in the overarching INTERSOS Safeguarding Framework, this policy specifically sets out INTERSOS' **approach to the collection and use of content (images and stories)** in relation to INTERSOS work and is intended to guide INTERSOS staff, partners and freelancers on best practice when gathering and using content. This policy applies to all INTERSOS employees (international, national personnel at country, regional and HQ level), interns, volunteers, consultants, contractors, board members, suppliers, business partners and freelance image makers working for INTERSOS, all of whom have a duty to comply with this policy. Whenever employees or staff are mentioned in this document it is intended to include all these groups of people.

## 2. POLICY STATEMENT

INTERSOS relies on the images and stories of the people we serve to communicate the importance and impact of INTERSOS work, and to support awareness-raising, advocacy and fundraising efforts. In line with INTERSOS Charter of Values and Code of Conduct, INTERSOS believe that people in need of assistance shall be represented as human beings with dignity, and that INTERSOS photos and videos shall be honest representations of the context and the facts. The collection of images can potentially cause harm if not carried out to high ethical standards and can potentially cause offence if they are intrusive or inappropriate. The use of images can also be counter-productive if they are reproduced inaccurately or with manipulation. INTERSOS commits to **be accurate and respect the rights of men, women and children** who choose to share their images and stories with INTERSOS, including their **right to participate, to be heard, and to be protected from risk and harm**, and to be considered as equal partners in the process of sharing their stories rather than passive subjects. Anybody taking or using images for, or on behalf of, INTERSOS shall read and adhere to this policy before carrying out their work.

## 3. APPLICATION

### 3.1 Core Principles:

This Policy is underpinned by the following core principles:

- INTERSOS shall **always put people first**.
- INTERSOS shall apply the **Do No Harm** principle to all images/videos collection and use.
- As signatory to the Code of Conduct of the International Red Cross and Red Crescent Movement, INTERSOS shall "recognise **disaster victims as dignified human beings**, not hopeless objects".
- INTERSOS shall **abide by** international law, standards and protocols related to vulnerable persons, including the United Nations Convention on the **Rights of the Child (CRC)**.
- INTERSOS shall comply with the General Data Protection Regulations (**GDPR**<sup>1</sup>), INTERSOS **data protection** and intellectual property rights SOPs.
- INTERSOS staff and associated personnel **shall not post on social media photos or videos** taken while working for INTERSOS nor images that represent community members assisted by INTERSOS without prior authorization of the Director of Communication Department

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<sup>1</sup> General Data Protection Regulations (GDPR) came into force across Europe in May 2018. GDPR require all organisations to have a lawful basis to process personal data, which includes images and personal information.

- INTERSOS shall truthfully represent a situation or story ensuring **accuracy** and communicating the context.
- INTERSOS shall **avoid stereotypes** and any form of exploitation or distorted reporting, including in fundraising appeals.
- INTERSOS shall explain to the protagonists being filmed and/or photographed what is the purpose of the photos/videos, when and how they will be used and answer any questions they may have before photographing, filming or recording.
- INTERSOS shall always ask for **informed, free given consent** and gather evidence of their consent.
- INTERSOS shall use all images and messages with the full understanding, participation and permission of the protagonist or the protagonist's legal guardian.
- INTERSOS shall ask the protagonists if they wish to be named or identified and act accordingly.
- INTERSOS shall **conceal the identity** of survivors of sexual assault, survivors of gender-based violence, LGBTQI+ people, people speaking out against government, authority or large corporations, people facing religious discrimination, and others who may risk negative consequences, such as reprisals, violence or stigmatisation in their communities, unless they are willing to be portrayed and reveal their identity and upon approval of the Director of Communication.
- INTERSOS shall ensure that the information shared during the informed consent process is clear and in a **language that the protagonist can understand**.
- When taking images of adults and children, (photos, video, etc.) INTERSOS shall ensure that they are respectful, that people are adequately clothed and that sexually suggestive poses are avoided at all times.
- INTERSOS staff shall **report** in a timely manner **any concern or suspicion** about inappropriate or intrusive images through the same procedures used for reporting SEAH and CP concerns or suspicions.
- Photos and videos taken during an assignment are the **exclusive property of INTERSOS**. Consequently, any picture or video taken by an employee may be freely used by INTERSOS. The copyright shall be stated as: ©INTERSOS
- INTERSOS staff shall always send a copy of the material produced in the field to the HQ Communication department/Head of Mission
- INTERSOS shall **carefully consider whether to release** the child's (or vulnerable adult's) **exact location** (i.e. the name of their neighbourhood or village) before publishing it.

## 3.2 Commitments and guidelines

### 3.2.1. Accuracy

INTERSOS shall be accurate in the use of images and ensure that:

- **Report only on facts/issues that we know are true** and do not make assumptions. Use the correct names and details of people and places. If people agree to have their image taken, but do not want to be named, INTERSOS shall respect their will and/or offer to use a changed name in lieu
- Quotes shall be correctly attributed.

- Before any communities' image is featured in an appeal where INTERSOS states to be working, the confirmation shall be obtained that the work is really taking place.
- If stock images are used, only information which is known to be accurate shall be used.

## a) Information

Together with images, a range of basic information shall always be collected, including:

- Date
- Place\*
- Name of person(s)\* - *see guidance on child protection.*
- Age (if known)
- Family status (e.g. 'mother of three')
- Relevance to INTERSOS' work (e.g. 'Head of village where INTERSOS built a Primary Health Care')
- and restrictions on use.

**Whilst it is important to collect the correct data, how INTERSOS publishes this data shall be in line with both INTERSOS PSEAH and Child Protection Policies and data protection legislation.**

**INTERSOS shall not store or share more information than necessary.** When possible, captions and case study information about children and their parents shall be limited to just the first name (or changed name) rather than the full name and the geographical location shall be as broad as reasonable.

## b) Translations

- When possible, INTERSOS shall use professional translators to get the full, detailed story and limit the potential for bias or misunderstanding. Translators shall be given clear terms of reference.

### 3.2.2. Consent

- INTERSOS shall always **provide clear information about the reason to take a person's image** and explain their **right to refuse** to be photographed/filmed or to remain anonymous.
- INTERSOS shall ensure that **consent shall be freely given.**
- Whenever possible, **programme staff shall visit a community** and explain **in advance** about the planned visit by the filmmaker and photographer.
- INTERSOS shall ensure that explanations are provided on **how the collected images and stories will be used** (across print, online, adverts etc.). It shall be made clear that the images could be used widely and internationally. If someone agrees that his/her image is taken and used but doesn't want it to be used in a particular medium, e.g. on social media, this shall be recorded and the images shall not be used in that medium.
- For anyone **under 18 years of age, consent** shall be sought both **from the child and from whoever has parental responsibility.** If this is not possible, the Communications Team at HQ ([communication@intersos.org](mailto:communication@intersos.org)) shall be consulted.

- In exceptional circumstances, INTERSOS shall seek **group consent, asking the consent** of the person(s) recognised as the group leader/representative, who agrees to provide the consent on behalf of those individuals present at the time of photos/videos collection. At the same time, the individuals also agree that the group representative does this on their behalf. **Local hierarchal structures** shall be respected to ensure that consent is obtained from the relevant people e.g. community leader. Parents or guardians shall provide consent for their children, as well as the children themselves.
- If it is not possible to gather informed individual or group consent, INTERSOS shall take **images in ways which do not reveal the individual identities** of those at the scene (e.g. blur the faces of anyone whose consent is not given in writing or verbally).
- The procedure of collecting and archiving an informed consent can be **derogated in exceptional situations** (i.e. fast onset emergencies, mass displacement, natural disasters) where it is not possible to engage in advance with the community. In these exceptional cases, informed written consent can be replaced by verbal consent for individual portraits and interviews, while group/mass photographs and video recordings shall not require consent.
- Consent requests shall be in **local languages**
- **Contact information** of either the local partner or a relevant INTERSOS country mission staff member shall be made available to the community so that individuals can ask questions about the use of their image and remove their consent if they so wish.
- The individual responsible for obtaining written or verbal consent during a field trip shall confirm that consent has been gathered for all images 1) placed on the local / in country archive on a computer or server with restricted access; 2) shared with [communication@intersos.org](mailto:communication@intersos.org) where it will be archived on a restricted access photo server. Completed consent forms for written consent or filmed consent for verbal consent should be archived together with the relevant images 1) on local / in country archive on a computer or server with restricted access; 2) sent to [communication@intersos.org](mailto:communication@intersos.org) where it will be archived on a restricted access photo server. For HQ staff, consent forms shall be provided to the Communications Team at HQ ([communication@intersos.org](mailto:communication@intersos.org)) to be archived.
- There is not an equal power relationship between INTERSOS and a community member whom we serve. People may feel unable to refuse a request to be photographed or filmed fearing that it may affect the provision of assistance. In order to avoid this, the practice of collecting images shall involve a dialogue with the person or community being represented who shall be engaged as **active participants in the process**.
- Equally, INTERSOS staff and partners shall provide their consent for their images to be taken and used.
- Informed consent shall be gathered for images shared on social media; this includes any photos shared by INTERSOS staff, partners and freelancers on a field trip whether posted on personal or official INTERSOS accounts. All INTERSOS staff shall obtain the authorization of the Head of Mission or line manager at HQ before sharing images of people assisted by INTERSOS on personal social media, blogs or websites.

There are three consent forms to be used in different situations as follows:

- For adults - form 1
- For minors (anyone under 18) - form 2
- For communities – form 3



**Consent forms can be found at the end of this document.**

The Head of Mission or the Communication team at HQ shall advise which form is the most appropriate.

**It is INTERSOS' responsibility to discuss consent and ensure that communities understand why images are taken and what they are used for.** If an employee, freelancer or someone working for a partner organisation feels that a photographer or filmmaker is working in an inappropriate way, or that inappropriate questions are being asked, they shall **immediately raise their concerns with the Head of Mission, the Communication team at HQ, or the Global Safeguarding Coordinator.**

### 3.2.3 Longevity

- Images are retained in accordance with INTERSOS **Data Protection Policy**.
- INTERSOS does not keep and use images for longer than is necessary.
- Images that are ten years old or older are archived with restricted access on the INTERSOS photo server. Approval from the Director of Communication department shall be sought before using these images.

### 3.2.4. Ethical integrity

- INTERSOS shall ensure that individuals are always depicted with agency, accuracy, and dignity.
- INTERSOS shall consider and reflect on how to **avoid harmful stereotypes, respect an individual's privacy and be mindful of cultural sensitivities.**
- INTERSOS shall not show images of people as helpless objects of pity or simply smiling recipients of aid. **Images of victimhood shall be avoided.**
- Images that could in any way reduce people to **objects of desire or show them in a degrading way shall never be used.**
- Images that show nudity shall not be taken if this exposure exceeds cultural norms in either the location where the image is taken or the location where it will be seen.
- **Care and sensitivity** shall be shown when taking or using photographs that depict taboo practices or stigmatised populations. If in doubt, seek advice from local staff and partners.

### 3.2.5 Privacy and respect

- Showing someone in emotional distress very close up could violate his or her privacy. Care shall be taken to **give the subject space.**
- At no time shall images or information be used that has any chance of resulting in discrimination of the person. **Anonymity shall be respected, if requested.**
- The location of any individual shall **not be revealed** by publishing the **GPS locations** of their homes, unless explicitly authorized and in respect of the do no harm principle.

### 3.2.6. Manipulation

INTERSOS shall maintain the authenticity of images according to the following criteria:

- **No changes** shall be made to alter the reality of the image, unless it is done by a professional and with the authorization of both the Head of Mission/Director of Communication department, for example by removing elements or applying filters that cover part of the pictures.



- Care shall be taken to ensure that any enhancements **do not alter the context of an image**.
- **Edited pieces** shall always accurately represent a person's story.
- **Images shall not be reversed** (change the direction, order, position, result, etc. of an image to its opposite) as this does not represent the picture that was taken.
- **Composite images shall not be created** (except in the instance outlined below) as this misrepresents the true picture.
- At times images set up for publicity may have added elements with the authorization of both the Head of Mission and the Director of Communication department.

### 3.2.7. Child protection

INTERSOS shall take extra care to ensure that the children featured in imagery are protected and their needs respected and is committed to the following:

- Respect the principles of INTERSOS **Child Protection Policy**
- Make sure that the **safety of the child** shall not be compromised by the dissemination of images of his or her home, community or environment.
- Whenever possible, a child shall **be accompanied** by his/her caretaker. while doing a report (video, photo, etc.). No child should be alone with one adult only, be INTERSOS staff or freelancers.
- **Obtain permission** from the child and the person who is responsible for looking after him or her.
- Ensure that the child does **not pose in any inappropriate manner** (sexual connotation).
- **Do not take or publish images that show any child** naked from the waist down and older female children naked also from the waist up.
- Always respect the **children's dignity**. Do not represent the children as victims (weak, desperate, etc.).
- Taking pictures or videos is reserved for **strictly professional use only**.
- Never indicate in the files any information that could **endanger a child victim** of abuse (title, metadata, captions, etc.).
- **Only use photos available for public use** (verified and validated by the Head of Mission or Director of Communication department)
- **Always change the name** and conceal the visual identity of any child who is presented as:
  - a) a victim of physical, sexual or psychological violence or of neglect
  - b) the author of sexual violence or acts of physical violence
  - c) accused, suspected or convicted of a crime (especially in places of detention)
  - d) child soldier and children associated to armed groups
  - e) an asylum seeker, refugee or a displaced person within his or her own country – unless there is a special permission from the Director of Communication department and/or Head of Mission

### 3.2.8. Working with donors

INTERSOS shall not place the needs and desires of donors and other programme visitors above the responsibility to respect the people INTERSOS serves. The following shall be observed when planning field trips with donors, journalists and/or supporters:

- **A briefing shall take place before the field trip** to explain INTERSOS' Ethical Image Policy and guidelines. At this briefing staff will stress that adherence to the policy is mandatory.

- Visitors shall be reminded that posting images on their own social media channels constitutes 'publishing' and therefore **informed consent must be gathered** for all content before it can be shared.
- When a visit is made to a community with donors or supporters there is an unequal power balance between INTERSOS and the people who are interviewed and photographed, therefore people may feel unable to say 'no' to photo/video requests. For this reason, nobody shall be asked to do or say anything they would not do normally.
- **Corporate branded items are inappropriate**, not only because the community member does not have a relationship with that brand – they have a relationship with INTERSOS, but also because such photos would not respect the dignity of the person photographed.
- People shall not be asked to hold **any props or anything branded by a donor**.
- Neither community members nor INTERSOS staff shall be asked to say anything in a language they don't usually speak and they shall not be asked to perform in any way.
- Communities shall not be asked to hold up signs or read out messages – including 'thank you' messages. It is acceptable if a community member says thank you on a film or in an interview without being asked or prompted.
- Anyone going on a field trip, whether partner staff or donors, shall **sign INTERSOS Code of Conduct** which includes reference to INTERSOS' values and principles.

### 3.2.9. Equality and non-discrimination

Photographs are an expression of INTERSOS' approach to equality and non-discrimination; therefore, there shall be careful consideration of who we are taking photographs of. All individuals shall be shown in a dignified way. This is particularly important for individuals who may face discrimination or exclusion. This may include, but is not limited to, older people, women, people with disabilities, and children. Photographers and filmmakers shall ensure that they depict people who may be discriminated against as an integral part of their society and their community – they should not be singled out.

### 3.2.10 Impact of a photography/film visit on the community

INTERSOS shall carry out a risk analysis and consider what impact the field trip may have on the community visited. It may raise expectations that work will be carried out and that a person's situation may change. This could have a knock-on effect far beyond what might be expected. If the aim of a field trip is to gain consent around a specific issue but there is no planned project work it is important that no false expectations are raised.

### 3.2.11 Credits

INTERSOS shall credit all photographs taken by freelance photographers in the following way: **INTERSOS/Photographer's name**; unless otherwise stated on the image library.

### 3.2.12 Sending images to third parties

INTERSOS shall only grant the use of its images to third parties, such as donors and publishers, who will use them to raise awareness of INTERSOS work, the impact of humanitarian crises and as a proof of the impact of funds (for donors).



As a rule, INTERSOS is contractually obliged to credit its photographers and agreements are in place regarding the use of their images. If an image needs to be shared with a third party to be used for purposes outside of raising awareness about INTERSOS work or if an image needs to be reproduced without a credit line, then the Communications Team at HQ ([communication@intersos.org](mailto:communication@intersos.org)) shall be contacted to gain permission to do this.

### 3.2.13 Legal issues

In 2018 the General Data Protection Regulations came into force in the EU. The application of these regulations implies that INTERSOS needs to have a lawful basis to process personal data (including images and personal information). INTERSOS' approach of treating everyone equally means that we are applying the same duty of care to anyone featured in our images regardless of where they live. By following our consent guidelines and ensuring people fully consent to the use of their images INTERSOS will be able to avoid any issues arising. In the vast majority of cases staff will use images without any cause for concern; if issues are raised then the ultimate decision about an image's use rests with the Director of Communication department.

### 4) Roles and Responsibilities

In addition to the roles and responsibilities outlined in the INTERSOS Safeguarding Framework, the following functions will have dedicated responsibilities in the application of INTERSOS Ethical Images policy:

**INTERSOS Director of Communication department** holds overall responsibility for the dissemination and application of this policy

**All INTERSOS Directors/Head of Missions** are responsible for integrating its implementation into daily decisions and for promoting awareness of this policy within their departments, country programmes or teams and with partners, freelancers and donors visiting INTERSOS programmes

**All INTERSOS staff, partners and suppliers** are obliged to adhere to these guidelines.

Failure to comply with these standards or failure to report Ethical Images concerns is grounds for disciplinary action pursuant to the INTERSOS Charter of Values, Code of Conduct, Safeguarding Framework and Associated Policies. This action may include verbal and written warnings, loss of privileges, denial of access to these resources and, in extreme circumstances, immediate dismissal and/or administrative sanctions.

### TO REPORT A CONCERN, YOU CAN:

- Do this verbally or in writing to your Line Manager, HR, country programme staff with safeguarding responsibilities or
- Send an email to: [complaint@intersos.org](mailto:complaint@intersos.org) or
- Send a WhatsApp message to: +39 3808970033
- Fill an incident report and put it in one of INTERSOS feedback boxes

## 5) REFERENCES

This policy should be read in conjunction with the following documents:

- Safeguarding Framework
- Code of Conduct
- Charter of Values
- Misconduct
- Data Protection SOPs
- GDPR
- PSEAH Policy
- Child Safeguarding Policy

## APPROVAL AND DATES

This policy was approved by 6 December 2023. This version of the policy takes effect on 6 December 2023 and will be reviewed in 36 months' time.

## POLICY OWNER

Director of Communication department

## ANNEXES - CONSENT FORMS

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**PHOTOS AND VIDEO CONSENT FORM / RELEASE**

**(For adults)**

I, (name) \_\_\_\_\_

**HEREBY GRANT PERMISSION TO**

INTERSOS Onlus - Humanitarian Organisation representatives, to take and use: photographs and/or digital images of me for use in news releases and/or communications or educational materials. These materials might include printed or electronic publications, Web sites or other electronic communications. I authorize the use of these images without compensation to me. All negatives, prints, digital reproductions shall be the property of INTERSOS Onlus – Humanitarian Organisation.

I further agree that my name and identity may be revealed in descriptive text or commentary in connection with the image(s).

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Signature of Adult subject)

**PHOTOS AND VIDEO CONSENT FORM / RELEASE  
FOR MINORS (Children under 18)**

I, (name) \_\_\_\_\_ parent or  
official guardian of (child's name)

\_\_\_\_\_

**HEREBY GRANT PERMISSION TO**

INTERSOS Onlus - Humanitarian Organisation representatives, to take and use: photographs and/or digital images of the minor for use in news releases and/or communications or educational materials. These materials might include printed or electronic publications, Web sites or other electronic communications. I authorize the use of these images without compensation to me. All negatives, prints, digital reproductions shall be the property of INTERSOS Onlus – Humanitarian Organisation.

I further agree that the child's name and identity may be revealed in descriptive text or commentary in connection with the image(s).

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Signature of Parent or Guardian)

**PHOTOS AND VIDEO CONSENT FORM/COMMUNITY**

I, (name) \_\_\_\_\_ **OF** (Community or institution): \_\_\_\_\_ in (Location): \_\_\_\_\_  
\_\_\_\_\_

**HEREBY GRANT PERMISSION TO**

INTERSOS Onlus - Humanitarian Organisation representatives, to take and use: photographs and/or digital images of the minor for use in news releases and/or communications or educational materials. These materials might include printed or electronic publications, Web sites or other electronic communications. I authorize the use of these images without compensation to me. All negatives, prints, digital reproductions shall be the property of INTERSOS Onlus – Humanitarian Organisation.