

Image Rights & Safeguarding Policy

Photography, video and personal images of the people we serve and work with

This policy sets out how everyone acting for LUkraine - staff, volunteers, board members, contractors and partners - must handle photographs, video and other images of identifiable people. It exists because our work brings us close to people in vulnerable situations, including children and families affected by war. Their dignity and safety come before any communication objective.

WHAT YOU MUST DO (IN ONE LINE)

Ask first, explain where the image will appear, get consent (from a parent for a child), keep people's dignity, store images safely, and never reuse an image for something the person did not agree to.

1 · Purpose and scope

The purpose is to protect the people in our images, to comply with Luxembourg and EU law, and to give colleagues clear, practical rules. It applies to all images collected, stored, edited, published or shared by or on behalf of LUkraine, on any channel (print, website, social media, reports, press, presentations, merchandise).

2 · Why this matters

An image of an identifiable person is personal data. Publishing it without a proper legal basis can breach data-protection law and the person's right to their own image, and - for people fleeing war - can create real safety risks for them and their relatives. Getting this right protects them first, and protects LUkraine second.

3 · Legal framework (Luxembourg)

- **Dóchas Code of Conduct on Images and Messages** (Dóchas — exact edition/year to verify): the sector-standard ethical code for development and humanitarian organisations photographing and communicating about people, promoted in Luxembourg by the Cercle de Coopération des ONG de Développement. LUkraine adopts it as its primary ethical reference for imagery and messaging — dignity, truthful captioning, informed consent and no staging — alongside the legal bases below, which govern the lawfulness of processing rather than the ethics of the image itself.
- General Data Protection Regulation (EU) 2016/679 (GDPR) and the Luxembourg Law of 1 August 2018 on data protection: an image of an identifiable person is personal data; processing needs a lawful basis, normally the person's consent.
- CNPD guidelines on the right to one's image (Commission nationale pour la protection des données, 2018): consent must be specific to each use and channel; consent for a printed publication does not cover online use; the burden of proving consent lies with the organisation publishing the image.
- Minors: for a child, consent must come from the parent or legal guardian; the child's own agreement is also sought. Luxembourg keeps the age of valid consent for information-society services at 16. [to verify - exact articles]
- Right to one's image and private life (droit à l'image), protected under privacy law and Article 8 ECHR. [to verify - exact civil-law reference]
- Copyright: the photographer or author holds rights over the photograph itself under the Luxembourg Law of 18 April 2001 on copyright and related rights; we secure the right to use any image made by a third party. [to verify - exact articles]

Statutory references marked [to verify] are to be confirmed with counsel before this policy is finalised. The obligations below follow the Dóchas Code, the CNPD guidance and the GDPR, and do not depend on those exact statutory citations.

4 · Core principles

- Dignity first - people are shown as human beings with agency, never reduced to their suffering.
- Informed consent - people understand what they are agreeing to before we photograph or publish.
- Do no harm - if an image could put someone at risk, we do not use it, even with consent.
- Data minimisation and purpose limitation - we collect only the images we need, and use them only for the purpose consented to.
- Accountability - we can show, for any published image, that we had the right to use it.

5 · The rules

ALWAYS	NEVER
Obtain informed consent before photographing or filming anyone, and explain where the image may appear (print, website, social media, press).	Never publish an identifiable person - especially a child - without valid, specific consent for that use and channel.
For a child or a person unable to consent, obtain consent from the parent or legal guardian, and seek the child's own agreement.	Never use imagery that exposes someone to reprisal, trafficking, stigma or identification of a protected location.
Show dignity and agency: portray strength, not only suffering. Caption truthfully; never stage or misrepresent.	Never use close-ups of distress for shock value, or imagery that dehumanises the person shown.
Store images securely, limit access to those who need it, and keep the signed consent with the image record.	Never keep consent-less material in shared libraries, or reuse an image for a purpose the person did not agree to.

6 · Consent - how we collect it

- Use the LUkraine image-consent form. Consent must be specific: it lists the uses and channels (website, social media, press, printed report) the person agrees to.
- Written consent is our standard, because the burden of proof is on us. Keep the signed form with the image record.
- For children and persons unable to consent: obtain the parent's or legal guardian's written consent, and respect the child's own wishes.
- Members, staff and volunteers who appear in our images are asked to renew their consent once a year.
- Right to withdraw: anyone may withdraw consent at any time; on request we stop further use and remove the image where reasonably possible.

7 · Children and vulnerable persons

Extra caution applies. Never publish a child's full name together with an identifiable image without guardian consent. Avoid any detail (school, address, location) that could identify where a child can be found. When in doubt, do not publish - ask the Direction.

8 · Storage, access and retention

- Store images in access-controlled LUkraine locations; do not keep them on personal devices or personal accounts.
- Limit access to colleagues who need it for their work.
- Keep an image only as long as needed for the consented purpose, then delete it; delete immediately on a valid withdrawal or objection.

9 · Third parties, photographers and copyright

- When a photographer or partner supplies images, agree in writing that LUkraine may use them, and for which purposes.
- Credit authors where required, and never remove a copyright notice or watermark without permission.

10 · Social media

Posting an image on social media is a publication and needs the same specific consent as any other channel. A consent given for one platform or campaign does not automatically extend to another.

11 · Roles and breaches

- Every colleague is responsible for following this policy in their own work.
- The Direction (Operations) oversees the policy, holds the consent records, and decides doubtful cases.
- Report any suspected breach or a lost or leaked image to the Direction without delay, so we can act to protect the person concerned.

Acknowledgement - mandatory reading

This policy is compulsory reading for everyone joining LUkraine. By signing below you confirm that you have read and understood it, and that you will apply it in your work. Please sign and return this page to the Direction.

I have read, understood and agree to follow the LUkraine Image Rights & Safeguarding Policy.

Full name	
Role / team	
Date	
Signature	

Return to: the Direction (Operations) · LUkraine asbl.