

Nasc Communications Policy

Nasc utilises communications and social media (e.g. Facebook, Twitter, the Nasc website, promotional material) for a wide range of reasons – to help raise awareness about issues impacting migrants, refugees, asylum seekers and ethnic minorities; to make commentary on current national or international policies which impact migrants, refugees, asylum seekers and ethnic minorities; to campaign for change in policies and legislation which negatively impact migrants, refugees, asylum seekers and ethnic minorities; to spread awareness in Irish society about the important contribution being made by migrants, refugees, asylum seekers and ethnic minorities living in Ireland; and to provide information to migrant, refugee, asylum seeker and ethnic minority communities about relevant news, upcoming events, changes in law and policy, etc.

Nasc adheres strongly to the principles of respect, dignity, equality, fairness, solidarity and justice when it comes to our communications. This means that all images and content posted on our website, in print material and on our social media sites conform to the highest human rights and ethical standards in relation to truthfulness, participation, non-discrimination, representation, and consent.

Social Media

Nasc welcomes and encourages the public's participation on our social media sites. We also know that not everyone who participates will always agree with us or support specific posts, and we welcome healthy, respectful debate and constructive criticism. However, our social media sites must also be protected as a 'safe space' for migrants, refugees, asylum seekers and ethnic minorities – and indeed all members of the wider community – to access and feel welcome and free from abuse.

Therefore, we do not tolerate –

- Discriminatory, inappropriate, offensive, abusive, bullying, defamatory or harmful language or hate speech (i.e. speech that targets people or groups based on race, ethnicity, religion, gender or any other protected status under Ireland's equality legislation)
- Comments or posts that threaten to harm individuals, groups or organisations
- Any personal information including but not limited to e-mail addresses, telephone numbers, mailing addresses, or identification numbers
- Commercial advertisements or solicitations of funds
- Endorsement or encouragement of illegal activities
- Anything that violates our Child Safeguarding Policy in respect to the protection and safeguarding of children, including posting images of or information about children without parental consent (see also the *Management of Images of Children, Young People and Vulnerable Persons* section below)

We moderate our social media sites on a regular basis. If we feel a user has violated our policy on social media participation, we will first give the user a warning. If the user repeats the behaviour, we will ban the user from our social media sites. If we deem the violation to be particularly severe, we will immediately ban the user with no warning.

If you would like to report a comment on Nasc's social media, or if you believe you have been banned inappropriately or in error, please contact Nasc via our social media messaging, or by email at info@nascireland.org or phone (021) 427 3594 and an individual staff member will follow up with you.

Our social media has been set up and is managed by Nasc for the purposes referred to above – users do not have an automatic 'right' to post whatever they want regardless of who it offends or harms. We reserve the right to block, ban and report any user we believe is not engaging with the ethos of our organisation, and this means respectful and constructive engagement that respects and promotes the dignity and equality of all. We appreciate your cooperation.

Management of Images of Children, Young People and Vulnerable Persons

Due to the nature of our work, Nasc does make some use of images of children, young people and vulnerable persons¹ in its online communications and promotional material. Nasc commits to adhere to the highest ethical and human rights standards in capturing, storing and publishing images of children, young people and vulnerable persons. The overarching purpose of this policy is to ensure children, young people and vulnerable persons are not inappropriately depicted in any image captured or published by Nasc.

All staff members or photographers commissioned by Nasc who are involved in capturing, processing, publishing or storing images of children, young people and vulnerable persons are expected to always act responsibly and with this objective in mind.

Definition: As referred to in this policy, a person's image means both still and movie images of a person held on any media. For the purposes of this document, the term "image" includes audio and video content. In this definition, it is also assumed that a person's image is an image of sufficient size and quality that it could be reasonably assumed that the person could be identified.

Nasc staff attending events with children, young people and/or vulnerable persons present, with the intention of taking photographs or capturing video, must alert the relevant authority and/or parent/guardian as appropriate, in advance of images being taken and will only proceed to film or photograph with the appropriate written consent. If a spontaneous or unplanned opportunity arises verbal consent can be obtained once it is followed by written consent before any image is stored or used. Staff members will also follow any restrictions or limits required by the event organisers (e.g. school).

¹ For the purposes of this policy, vulnerable persons can mean a "vulnerable adult", which is a person aged 18 or older who may be at greater risk of abuse or neglect or who may be unable to take care of him or herself, or unable to protect him or herself against 'significant harm' or 'exploitation'. This may be as a result of mental or other disability, age or illness. It can also refer to the definition of a vulnerable person in an asylum context, as defined in Article 21 Directive 2013/33/EU, which can include: minors, unaccompanied minors, disabled people, elderly people, pregnant women, single parents with minor children, victims of human trafficking, persons with serious illnesses, persons with mental disorders and persons who have been subjected to torture, rape or other serious forms of psychological, physical or sexual violence, such as victims of female genital mutilation.

Nasc staff will provide an assurance that any images captured will only be used with the express permission of the event organisers and/or parent/guardian. Staff are recommended to carry identification and be prepared to offer an explanation for the work, if working in public or private places particularly where spontaneous or unplanned images are recorded.

Nasc will only capture images of children, young people and/or vulnerable persons at events when instructed to do so by the staff member in charge of this at the event. At such events, efforts must be made to ensure that attendees are aware that filming may take place.

All images captured by Nasc are the property of Nasc and cannot be used by individual staff members for personal use.

Images of children, young people and vulnerable persons will only be used by Nasc to illustrate the nature of the organisation's work. Images of children, young people and vulnerable persons will not be lent or issued to third parties without the appropriate written consent (i.e. of the individual and/or the parent/guardian and child, if over 13).

Nasc will only use images of children, young people and vulnerable persons in print or online (on websites or social media pages) where express written consent of the individual or the parent/guardian and the child if aged over 13 years has been obtained. This includes: Nasc website, Facebook, Twitter, other social media and online platforms, print publications and promotional material.

Nasc will not identify or name individuals in captions accompanying an image without securing the express written consent of the individual or the parent/guardian and the child if aged over 13 years.

Images of children, young people and vulnerable persons posted to Nasc's social media platforms (e.g. Facebook) by followers should conform to the standards Nasc maintain for their own images. Images posted by followers or contributors in breach of Nasc's image policies will be removed.

General guidelines to be followed in all cases:

- Where possible images should capture groups rather than individual activities
- Image capture should generally be of children, young people and vulnerable persons at events, in class or at play
- No images should be taken of children, young people and vulnerable persons that would breach their privacy or impinge upon their personal dignity (changing rooms, bathrooms, use of physical aids) etc.
- When taking images, staff should not in any circumstances capture any images of children, young people and vulnerable persons in distress or embarrassment
- The children, young people and vulnerable persons should be appropriately dressed.

Storage of images of children, young people and vulnerable persons

Nasc will take reasonable and practical steps to protect images of children, young people and vulnerable persons. Physical images and physical storage media involving images of children, young people and vulnerable persons will be stored in secure filing spaces in the Nasc office. Digital files involving images of children, young people and vulnerable persons will be stored in line with our data protection policy.

Copyright

Nasc, the Migrant and Refugee Rights Centre owns the copyright of all images taken by its staff members or photographers commissioned by Nasc on its behalf. Nasc recognises the copyright of the originators of an image and will use said images only under the terms of its usage agreement. Consent may be withdrawn at any time by the individual, parent/guardian or child in writing for future use of an image.

Third Party Usage

Nasc will provide rights to reproduce people's images that it owns to approved third parties (e.g. national/local media) only where additional usage written consents have been secured from the subject of the image, the relevant school/parent/guardian (as appropriate) and the child if aged between 13 to 18 years of age and where a manager has given written permission, having specifically checked, and is reasonably convinced that the image or images will be appropriately used and protected.

The overarching purpose of this procedure is to ensure that children, young people and vulnerable persons are not inappropriately depicted in any image provided by Nasc to third parties and that as far as possible those third parties will handle such images responsibly.

All staff members involved in capturing, processing, publishing or storing images of children, young people and vulnerable persons are expected to act at all times responsibly and with these objectives in mind

~ The Nasc Team