



Safeguarding & Content for Family Holiday Charity

1 Who this policy is for and what it covers

- 1.1 The subjects for this policy includes families, but also referrers, supporters, partners, suppliers, staff members, trustees and any other volunteers.
- 1.2 Content includes but isn't limited to stories, interviews, quotes, feedback, photography, video, audio and so on. Content could be used in a range of ways, for example websites, social media, printed matter and so on to promote the mission of the charity, and for fundraising.

2 Key principles of content capture for Family Holiday Charity

- 2.1 Content capture, including interviews could be with charity staff members or retained freelancers or contractor.
- 2.2 Both staff members and retained freelancers must complete annual safeguarding training (or provide evidence of ongoing safeguarding training from a reputable professional body).
- 2.3 Staff members should not use their personal mobile devices or other means (such as social media) to contact subjects, particularly families.
- 2.4 Content capture may take place over the phone, or face to face.
 - If a face-to-face meeting takes place, staff, freelancers and interview subjects should take steps to protect themselves and each other, and not undertake the activity alone.
 - When creating content with families in particular, a suitable chaperone is required. This would typically be a member of staff.
 - In the case of any children being involved in content creation, the chaperone must be a parent, guardian or referrer who is able to advocate for the child/children.
- 2.5 Subjects must be suitably prepared by Family Holiday Charity for the activity which includes understanding where and how content may be used. Ahead of the activity taking place they should also what will be asked or happen and agree to take part (including agreeing to be interviewed).
 - It must be explained to subjects how they can opt out of the content activity or have a way to say they are uncomfortable with activity or questions being asked.
 - Where a subject is being videoed, recorded or photographed, additional explanation will be required to ensure the subject understands where and how the recordings or images may be used and for what purposes.
- 2.6 Content cannot be used unless Family Holiday Charity has written permission/consent form that shows that the subject has understood the process, and that the subject agrees to the content/interview etc. The subject must also have selected where and how they are comfortable with the content being used from the options presented to them.
 - Where possible, it is best practice for completed stories or content to be shared with the subject (particularly where interviewing families) before use, so they are clear about how information is being explained and presented.
 - The permission form can be completed in paper format or via an online link.

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- 2.7 Before content is used by any team members, the permissions for the use of the content must be checked.

3 Working with freelancers, contractors and other suppliers

- 3.1 Contractors (freelancers or third party) who interview subjects including families are currently asked to self-declare any convictions or reasons why they are not suitable to work directly with vulnerable people as part of the recruitment process.
- 3.2 Retained story-telling freelancer(s) are required to complete the same safeguarding training that Family Holiday Charity staff undertake (an online course, and face-to-face training).
- If the individual can evidence training via another source, they may be exempt from this requirement. The Designated Safeguarding Lead for Family Holiday Charity will approve any alternative training.
- 3.3 Where appropriate, freelancers may also be asked to undertake a basic DBS check.
- An standard/enhanced DBS check may be required for specific projects if this is part of the project agreement or there are special circumstances which identify this as an appropriate measure to take.
- 3.4 A signed data-sharing and or non-disclosure agreement is also required for retained freelancers.

Practical Considerations

4 Content capture, including interviews, via telephone

In line with the Key Principles identified above, which all apply, the following is worthy of note:

- 4.1 Telephone interviews can take place on a 1:1 basis, no chaperone is required
- 4.2 Family Holiday Charity staff members must use provided office systems to speak to interview subjects – for example the BRIA telephone system. Staff must not use their personal mobile devices to speak to families in particular.
- 4.3 Retained freelancers and contractors can their own personal devices, and the treatment of data and personal information around this is covered in the non-disclosure/data agreement that forms part of their contract.
- 4.4 If the activity is being recorded to assist with, for example, writing a transcript, the subject must have given verbal consent to the recording taking place. It's a requirement that the recording is deleted after the call transcripts have been written up

5 Content capture, including interviews & video via face-to-face meeting

In line with the Key Principles identified above, which all apply, the following is worthy of note:

- 5.1 Additional consideration and time must be given to the preparation of the subject where video production in particular is concerned, for example around the implications of images being shared in parallel with stories. This activity must take place well ahead of the session

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being booked in, and when the session commences to ensure the subject is fully informed and freely giving their permission.

- 5.2 Interviewers should ensure a suitable person is present with them and, for family interviews, should also ensure their interview subject is suitably chaperoned.
- 5.3 Family Holiday Charity staff must not use their own personal devices for any filming or recording unless they have gained the prior permission of their director, the designated safeguarding lead or deputy designated safeguarding lead.
- 5.4 Retained freelancers and contractors will often have been hired for this activity because of their ability to provide specialist equipment. The treatment of data and personal information around this is covered in the non-disclosure or data agreement that forms part of their contract.
- 5.5 If the activity is being recorded to assist with, for example, writing a transcript, the subject must have given verbal consent to the recording taking place. It's a requirement that the recording is deleted after the call transcripts have been written up

6 Interviews and video with third parties including the media

In line with the Key Principles identified above, which all apply, the following is worthy of note:

- 6.1 Additional considerations are required in preparing subjects for content for use with third parties and the media.
- 6.2 In particular, there should be a discussion about how the charity does not have control over the content and what this may mean in the event the subject were to change their mind or rescind permission.

Sharing stories and content

- 7 Sharing stories and content brings additional responsibilities. The Key Principles highlight that the charity will ensure content is used only when express written permission has been granted. Additional considerations include:

7.1 Anonymisation

- In some cases it will be necessary to anonymise the story to protect the subject, particularly where sensitive information is included or where identifying information could make the family more vulnerable – for example, locations, timelines, specific medical conditions and so on.
- Some subjects may prefer to use an alternative name (pseudonym) – where this is the case, staff members using content need to be very clear about the real subject and alternative names being used.

7.2 Using content provided by families

- Family provided or user-generated content is subject to the same processes as content created via other means. If it is provided, it must be stored and managed in line with the relevant permissions provided. For example, if a family changes their mind, the content can be recalled, or if no third-party permission is granted, cannot be used with a partner.

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- Where a family posts and tags Family Holiday Charity on social media, the charity has no control over any third parties who may opt to use the content.
- Where a family has provided quotes or information as part of their feedback from a holiday, this information can be used without additional permission so long as the quotes are anonymous, and the quote contains no identifying features or information.
- This content will be processed by the relevant parties (Income & Engagement team, Content Executive) and processed in line with the permissions policy to ensure the content is subject to the same management controls as other content (eg where and when it can be used).

7.3 Permissions

- Permissions are requested for the use of a story for 3 years (from the date permission is granted). If the charity wishes to continue to use that content after that time, a new set of permissions is required from the subject

7.4 Change of heart: A subject can change their mind about content being used at any time.

- The permission form states that we will do all we can to remove materials, but where things are in print or are in circulation where we have no control, we cannot guarantee to rescind these.

7.5 Categories of permission: Permission is requested in several categories.

- These categories reflect the reality of how content is practically used by the charity, and are shown in the permission form which is linked here:
<https://familyholidaycharity.org.uk/policies-and-downloads/photo-story-and-media-permission>

Document Review:

This document is reviewed annually, unless otherwise required.

Date for next revision: January 2023.