AHRC Visibility Spotlight

Dear Organiser of an AHRC Event,

This document explains the steps needed to share pictures of your AHRC events with us for the AHRC Visibility Spotlight posts of ELSA International in compliance with data protection requirements.

If you have any questions, do not hesitate to contact director.ahrc@elsa.org for questions in relation to the AHRC or dataprotection@elsa.org for any questions on data protection.

How to prepare your event for the AHRC Visibility Spotlight

When you collect participant registrations for events that may involve photography, it is important to ensure that the existing consent form and Privacy Policy prepared by ELSA International are properly incorporated. Here is a concise explanation tailored specifically to **implementing this existing consent form and Privacy Policy into your individual event registration forms**. This helps ensure that any photos later shared with the International Board for AHRC Visibility Spotlight posts related to the Annual Human Rights Campaign are obtained and processed in a lawful, transparent and consistent manner. Please follow the steps below and the good practice example on how to do it in practice for your form.

If you collect consent on paper instead, the same steps apply. Section 6 explains how.

1. Ensure Visibility and Accessibility

The consent text and Privacy Policy must be clearly presented within the registration form, not hidden or optional to view. Participants should be able to easily read the policy before giving consent. For this purpose, you can include the Privacy Policy as a link or attachment to the form.

For the Privacy Policy, you can use the Template (found here). You only need to add your ELSA Group's details (ELSA Group, Address, E-Mail) to the Policy on pages 1, 4 and 9. Then you can create a PDF document out of it, save it on your Google Drive and link it to your form.

2. Explain the Purpose Directly in the Registration Form

Briefly restate the purpose of collecting and sharing photos:

- **To photograph and video record you**
  What we collect: Pictures and videos of you
- **To share these photos with ELSA International in order to use the above photographs for promotional purposes related to ELSA for up to 7 years. In particular, to use and publish the above photographs and videos of you in various media outlets, including but not limited to websites, social media, and promotional materials.**
  What we share and publish: Pictures and videos of you

Embedding this explanation ensures the context is clear at the moment consent is given. Also state that saying no does not affect participation in the event.

This consent covers taking photos and sharing them with ELSA International. It does not cover your Group publishing the photos on its own channels. If your Group wants to do that, ask for that consent separately.

3. Integrate Consent as a Separate, Explicit Step

Consent for photo use should not be bundled with general event registration. Include a dedicated question or signature section stating that the participant has:

- Read and understood the Privacy Policy;
- Given explicit consent for photos and videos to be taken;
- Given explicit consent for photos and videos to be shared with ELSA International and used for promotional purposes of ELSA, such as AHRC Visibility Spotlight posts.

This ensures compliance with data-protection standards and avoids any misunderstanding. Please make sure that the consent is:

- **Freely given**: Consent must be given voluntarily, without coercion or pressure. Registration and participation must never depend on giving consent;
- **Specific**: Consent should be obtained for specific purposes, not blank agreement; specify the purpose for which the legal basis is consent;
- **Informed**: Users need clear information about what they are consenting to (make sure to include all types of data collected, how it will be used, and who it will be shared with);
- **Unambiguous**: Consent must be indicated by a clear, affirmative action, such as clicking an "accept" option or ticking a box on a written form;
- **Equal prominence**: "accept" and "reject" buttons should be displayed with equal prominence and accessibility;
- **No pre-ticked boxes;**
- **Easily withdrawn**: It should be as easy to withdraw consent as it is to give it. Inform users how to withdraw consent;
- Written in **clear and simple language**.

Recommendation: In an online form, set up each of the two consent questions as a **multiple-choice question** (one answer only), not as checkboxes. With checkboxes, a participant can select both answers or neither, which leaves you without a clear record.

Confirming that the Privacy Policy has been read is not consent in itself, so it can be a required question. The two consent questions must always offer both a consent and a do-not-consent option.

4. Clarify Rights and Withdrawal Options

Even though the Privacy Policy already covers rights, the registration form should reiterate that:

- Consent can be withdrawn at any time, and participants can request removal of their photos.

Include the relevant contact information for privacy inquiries.

If someone withdraws consent after you sent their photos to ELSA International:

1. Confirm receipt to the person.
2. Stop using their photos and videos, and delete them from your own storage.
3. Note the withdrawal with your consent records (name, date, what was removed).
4. Inform your National Coordinator and director.ahrc@elsa.org without undue delay, and at the latest within one week, saying which event and, where possible, which files.

ELSA International will then remove the material from its storage and from future posts, and remove already-published posts in which the person can be identified.

5. Maintain Records

Organisers should ensure that the registration system stores a clearly identifiable record of the participant's consent (e.g. timestamped form response). This documentation is necessary in case ELSA International later needs to verify that appropriate consent was obtained.

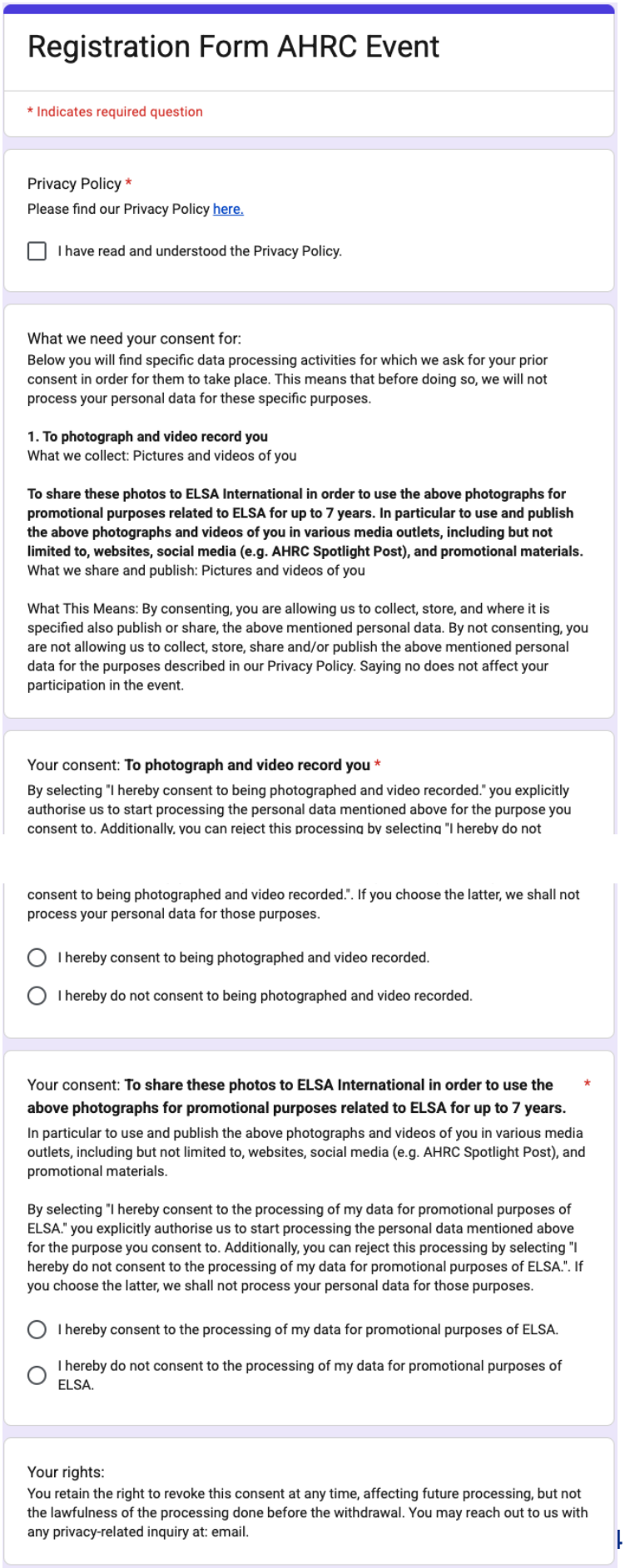
How long: keep the consent records for **7 years from the date of the event**, then delete them. ELSA International may use the photos for up to 7 years, and for that whole period your Group must be able to prove consent was given. If a complaint or dispute about the material is ongoing at the end of the 7 years, keep the relevant records until it is resolved.

What to keep:

- **Online form:** an export of the consent columns only (name, timestamp, Privacy Policy confirmation, the two consent answers).
- **Written form:** the signed forms, either the paper originals or scans of them.
- **In both cases:** the Privacy Policy PDF used for the event, a screenshot or blank copy of the form as participants saw it, and a note of any withdrawals.
- **Photos and videos:** keep them only as long as your Group needs them, and delete those of anyone who withdraws consent.

Where: in your Group's official account, never a personal one, with access limited to the officers who need it. Keep paper forms locked away, or scan them and shred the originals. As this period extends beyond several board terms, note the deletion date and include the location of the records in your transition materials.

Good practice example: Registration Form AHRC Event



Registration Form AHRC Event

* Indicates required question

Privacy Policy *

Please find our Privacy Policy here.

☐ I have read and understood the Privacy Policy.

What we need your consent for:

Below you will find specific data processing activities for which we ask for your prior consent in order for them to take place. This means that before doing so, we will not process your personal data for these specific purposes.

1. To photograph and video record you

What we collect: Pictures and videos of you

To share these photos to ELSA International in order to use the above photographs for promotional purposes related to ELSA for up to 7 years. In particular to use and publish the above photographs and videos of you in various media outlets, including but not limited to, websites, social media (e.g. AHRC Spotlight Post), and promotional materials.

What we share and publish: Pictures and videos of you

What This Means: By consenting, you are allowing us to collect, store, and where it is specified also publish or share, the above mentioned personal data. By not consenting, you are not allowing us to collect, store, share and/or publish the above mentioned personal data for the purposes described in our Privacy Policy. Saying no does not affect your participation in the event.

Your consent: **To photograph and video record you** *

By selecting "I hereby consent to being photographed and video recorded." you explicitly authorise us to start processing the personal data mentioned above for the purpose you consent to. Additionally, you can reject this processing by selecting "I hereby do not consent to being photographed and video recorded.". If you choose the latter, we shall not process your personal data for those purposes.

○ I hereby consent to being photographed and video recorded.

○ I hereby do not consent to being photographed and video recorded.

Your consent: **To share these photos to ELSA International in order to use the above photographs for promotional purposes related to ELSA for up to 7 years.** *

In particular to use and publish the above photographs and videos of you in various media outlets, including but not limited to, websites, social media (e.g. AHRC Spotlight Post), and promotional materials.

By selecting "I hereby consent to the processing of my data for promotional purposes of ELSA." you explicitly authorise us to start processing the personal data mentioned above for the purpose you consent to. Additionally, you can reject this processing by selecting "I hereby do not consent to the processing of my data for promotional purposes of ELSA.". If you choose the latter, we shall not process your personal data for those purposes.

○ I hereby consent to the processing of my data for promotional purposes of ELSA.

○ I hereby do not consent to the processing of my data for promotional purposes of ELSA.

Your rights:

You retain the right to revoke this consent at any time, affecting future processing, but not the lawfulness of the processing done before the withdrawal. You may reach out to us with any privacy-related inquiry at: email.

1. Ensure visibility and accessibility through linking the Privacy Policy.

2. Integrate "I have read and understood the Privacy Policy".

3. Explain the purpose directly in the registration form.

4. Integrate consent "To photograph and video record you".

5. Integrate consent for sharing and promotional purposes.

6. Clarify rights and withdrawal options.

6. Written Consent Forms

Use a written form when people register on site, when the event has no online registration, or for guests who did not fill in your form. A signed form is as valid as an online one if it follows sections 1 to 5.

- **One form per person.** Do not use a shared sign-in sheet with consent columns, as everyone signing after would see other people's choices;
- **Prepare it in advance:** fill in the event title, date and your Group's details, and add the QR code linking to your Privacy Policy;
- **Collect it at registration,** before the event starts;
- **Check each form as you collect it.** An answer left blank counts as no. If both options are ticked, ask the person to correct it, or count it as no;
- **Help the photographer:** you can give people who declined a discreet marker, such as a coloured sticker;
- **After the event,** list who said yes to both questions and use that list when selecting photos. Store the signed forms as described in section 5.

7. Speakers, Guests and Officers

Everyone identifiable in a photo you send us needs to have consented, not only registered participants.

- **Speakers, guests and partners** usually do not fill in the registration form. Send them the consent wording by email before the event and ask for a written reply, or ask them to sign the written form on the day.
- **Walk-ins** sign the written form at the entrance.
- **Organisers and photographers** who appear in photos must also give consent.
- **Brief the photographer:** before the event, tell the photographer who did not consent, whether consent was collected online or on paper.
- **People in the background** who did not consent: crop them out or leave the photo out. Before taking a group photo, invite anyone who has not consented to step out of the picture.

8. Special Cases

If consent for ELSA International was not collected before the event. You can still send us photos if you obtain consent afterwards. Email the participants who appear in your selected photos with the wording from section 2 and ask them to reply yes or no to each consent question. Only people who reply yes to both may appear in what you send us; no reply means no. Keep the replies as your consent records. This consent covers sharing and publication only and does not retrospectively establish a legal basis for taking the photographs. For future events, ensure that consent is collected before the event.

Groups outside the EU/EEA. ELSA International processes all Spotlight material under the GDPR, so please follow this guide as the minimum standard. Also check your national data protection law and any national rules on using a person's image.

9. What to Send with Your Photos

For every event, send us proof of how you collected consent, not the consent records themselves:

- the completed Privacy Policy PDF used for the event;
- a screenshot of your online form's consent section, or a scan of the blank written form (or both, if you used both).

Please do **not** send signed forms, registration exports or lists of participants. Those stay with your Group (section 5). Only send photos and videos of people who said yes to both consent questions.

The AHRC team checks the documents for each event. If they are incomplete, we will contact your National Coordinator. Material without proof of how consent was collected will not be published.

The deadline, submission form and folder structure are announced for each edition of the AHRC Visibility Spotlight.

10. Check Before You Send Your Photos

- ☐ Your Privacy Policy is completed with your Group's details and linked in your form (or available on paper).
- ☐ Your form has two separate consent questions, each with a consent and a do-not-consent option, and nothing is pre-ticked.
- ☐ Consent was collected from participants, speakers, guests and officers.
- ☐ The photographer knew who did not consent.
- ☐ Only people who said yes to both questions appear in the photos you send.
- ☐ Consent records are stored in your Group's official account for 7 years from the event.
- ☐ The completed Privacy Policy PDF and proof of your consent form are included with your photos.