

## Media & Archival Retention Policy

Approved by: Prima Nota Committee

Effective Date: 08.12.2025

Applies to: All members, volunteers, contractors, partners, and participants

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### **1. Purpose**

This policy outlines Prima Nota's approach to the retention, use, and removal of photographic, video, and media materials created in the course of the organisation's community, cultural, and operational activities.

Its purpose is to:

- protect Prima Nota's historical records,
  - ensure compliance with Australian privacy standards,
  - safeguard creative and archival materials,
  - clarify what types of media may or may not be removed upon request.
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### **2. Scope**

This policy applies to:

- all public event documentation;
- all community workshops, rehearsals, festivals, and programs;
- all organisational activities photographed or filmed by Prima Nota;

- all digital assets published on Prima Nota’s website or social media;
- all grant-related documentation;
- all internal governance media.

It applies to current and former members, volunteers, participants, and partners.

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## **3. Definitions**

### **3.1 Personal Data**

Information relating specifically to an individual that is held for internal administrative purposes (e.g., contact details, membership forms, role-based portraits).

### **3.2 Public Event Documentation**

Images or videos taken at public, community, or open events where general participation is implied.

### **3.3 Organisational Archival Media**

Media that documents Prima Nota’s work, including group photos, festival participation, award ceremonies, multicultural collaborations, community events, and grant deliverables.

### **3.4 Role-Based Media**

Photos or content created specifically to represent an individual in an organisational capacity (e.g., committee introductions, facilitator profiles).

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## **4. Retention Principles**

Prima Nota retains media that:

- documents the organisation's activities;
- is required for grant applications or acquittals;
- contributes to historical archives;
- records community engagement, artistic output, or cultural collaboration;
- demonstrates organisational impact or growth.

Such media cannot be deleted upon individual request.

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## **5. Media Eligible for Deletion Upon Request**

Upon resignation or written request, Prima Nota may delete the following:

### **5.1 Personal Data**

Contact details, phone numbers, email addresses, residential addresses.

### **5.2 Role-Based Media**

- Committee introduction photos
- Solo headshots
- Biographies
- Portraits provided specifically for organisational representation

These will be removed within 30 days of the request.

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## **6. Media Not Eligible for Deletion**

The following cannot be removed upon request, whether the request is implied or explicit:

## **6.1 Public Event Documentation**

Photos and videos taken at:

- multicultural festivals
- parades
- community events
- council events
- Maslenitsa
- public performances
- open workshops

Even if an individual appears in the image.

## **6.2 Group Photos**

Any photograph or video featuring multiple participants, including:

- volunteer gatherings
- award ceremonies
- committee group shots
- gift presentations
- cultural collaborations

- social events related to Prima Nota operations
- group rehearsals

### **6.3 Organisational Archival Media**

Media required or used for:

- grant submissions
- grant acquittals
- annual reporting
- program documentation
- historical recordkeeping

### **6.4 Creative or Editorial Projects**

Such as:

- “Stories of Belonging”
- festival highlights
- photo essays
- storytelling campaigns
- promotional reels
- cultural documentation

This media becomes Prima Nota’s intellectual property at creation.

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## **7. Legal Basis**

Under the Australian Privacy Principles (APPs):

- Group photos at public or community events are not considered “personal data.”
- Individuals do not have a “right to erasure” for public documentation.
- Organisations retain copyright and editorial control over media they create.
- Archival and grant-related media must remain intact for minimum retention periods.

Prima Nota therefore is not required to delete group or event media under any circumstances.

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## **8. Requests and Responses**

All requests concerning media deletion must be submitted in writing.

Prima Nota will respond using the following language:

Group images and public event documentation do not constitute personal data and are not subject to deletion. These materials form part of Prima Nota’s creative and archival records and will remain published.

Once this response is issued, the matter is considered closed.

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## **9. Protection Against Harassment or Defamation**

If any individual engages in harassment, intimidation, or defamatory statements relating to Prima Nota’s media practices, the organisation may take further action, including:

- issuing a formal notice,
  - restricting communication,
  - invoking legal processes if necessary.
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## **10. Review**

This policy is to be reviewed annually by the Prima Nota Committee to ensure compliance with legal and organisational standards.