

# Communications Policy

## Document History

Version	Date	Changed by	Description
0.10	01/11/2020	Swetha Prakash	Updated as per <b>ACFID</b> requirements
			Next review before annual board meeting

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## 1. Purpose

The purpose of this Communications Policy is to provide a framework for all Plus Education and its subsidiaries' communications, use of media, and related privacy considerations in keeping with its commitment to integrity, inclusivity, and respect for all.

## 2. Responsibilities

- 2.1** It is the responsibility of all Directors, employees, volunteers, contractors, and program partners to ensure that they comply with this Policy.
- 2.2** In all communications with the public, Plus Education will act in an honest and transparent way.
- 2.3** Plus Education is committed to accounting for cultural and social sensitivities in its communications and will be inclusive and respectful of all the people it works with.
- 2.4** All Plus Education staff, volunteers, representatives, consultants and partners are required to read, understand and follow the guidelines set forth by the ethical decision making framework, particularly in complex contexts.
- 2.5** All documents produced, for both internal uses and wider circulation, will comply with appropriate State and Federal laws, policies, and requirements, and the ACFID Code of Conduct as well as the ACFID Fundraising Charter (Annexure B).



### **3. Integrity**

#### **3.1 Public communication**

All public material must be quality checked to ensure accuracy and quality and reviewed by a third party before publication. The Head of Fundraising and Communications (or the CEO, in their absence) has primary responsibility for ensuring that all Plus Education publications and communications are accurate, up-to-date, accessible, respectful, and compliant with Plus Education policies (such as the *Child Protection*, and *Development and Non-Development Policies*).

#### **3.2 Media**

Plus Education ensures that the use of images and messages portraying primary stakeholders is appropriate, accurate and consensual. Images used by Plus Education of women and men, boys and girls in their communications will respect the dignity, values, history, religion, and culture of the people portrayed. Children will be portrayed positively as part of their community, with prior consent sought from their parents and/or guardian.

#### **3.3 Personnel**

All Directors, staff, volunteers, contractors and project partners must seek the appropriate permission and consent of primary stakeholders or their adult guardians (in the case of children) when collecting images, taking photos or videos and documenting stories in the field.

### **4. Accessible information and stakeholder engagement**

#### **4.1 Updates and dissemination of information**

Plus Education will keep all members, supporters and the broader community informed of its activities via its monthly newsletter as well the Plus Education Foundation website blog; flyers and brochures; social media activities relating to Plus Education and its work; and the Annual Report. Volunteers' contributions will be highlighted in Plus Education's newsletters/website as appropriate.

#### **4.2 Fundraising related communication**

Fundraising documentation will also clearly state the purpose for which funds are being raised, how money collected will be used, how money collected more than the required amount will be spent, and any other information as required by appropriate Federal and State Legislation. Fundraising materials will make a clear distinction between development and non-development activities. Where there is reference to both development and non-development activities, they will be reviewed to ensure that donors are provided with the choice of contributing only to development activities.



## 5. Privacy

**5.1** Plus Education is committed to protecting the privacy of personal information that the organisation collects, holds, and administers. Personal information is information which directly or indirectly identifies a person. Plus Education Foundation complies with the Australian Privacy Principles contained in the *Privacy Act 1988* in handling personal information collected from clients/beneficiaries, business partners, donors, members of the public and Plus Education personnel (including members, volunteers, employees, delegates, candidates for volunteer work and prospective employees).

**5.2** Plus Education recognises the right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other. Plus Education will:

- Collect only relevant information that the organisation requires for its primary function.
- Ensure that stakeholders are informed as to why information is being collected and how it will be used.
- Use and disclose personal information only for primary functions or a directly related purpose, or for another purpose with the person's consent.
- Store personal information securely, protecting it from unauthorised access.
- Provide stakeholders with access to their own information, and the right to seek its correction.

All staff, Board members, volunteers, consultants and project partners must observe these privacy guidelines in relation to any public information presented to the media or public.

## 6. Guidelines for the Use of Images and Messages

- Present photographs, films, videos, DVDs and messages of women and men, boys and girls in a respectful manner, honestly portraying their personal experience and context and as partners in the development process.
- Avoid images or messages that manipulate the story to portray people in a pitiful way.
- Portray children positively as part of their community and in a dignified and respectful manner.
- Strictly avoid images of children where they are not adequately clothed and in poses that could be sexually suggestive.
- Ensure images are honest representations of the context and facts.
- Ensure that the collection of information, images and stories does not harm people or the environment.
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.
- Portray participants in activities which reflect their daily lives.



- Convey the context and complexity of the situations in which local people live. Images of people in vulnerable situations should focus more on the reasons for and the context of a situation, rather than on an individual's suffering.
- Honestly portray the diversity of local people including age, disability, and other marginalised groups.
- Inform key persons in images of what the image is being used for and obtain their permission. In the case of a child, obtain informed consent from the child and a parent or guardian before photographing or filming. An explanation of how the photograph or film will be used must be provided.
- Show some examples of the kinds of materials that are produced so that those involved understand how their personal details and story might be used.
- Ensure that the identification of or use of images of local people will not bring them into any danger.
- Take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child.



## Annexure A: Ethical Decision Making Framework for Communications

### 1. Purpose & Scope

An Ethical Decision Making Framework (EDMF) for communications is a tool to help our organisation make ethical decisions when creating and publishing communications content. It is designed to be used in ethically complex contexts where it is not clear if an image or story should be used.

This EDMF uses a framework of structured discussions at important moments during the storytelling process. It outlines key issues to be considered, when discussions should happen, who should be involved and what personnel should do if they are unable to make a decision.

This EDMF is to be followed by everyone who collects and publishes stories at Plus Education. That includes all staff, partners, volunteers and governing body members in India, Cambodia and Australia. The EDMF applies to visitors to our programs and any contractors and consultants who we engage. It also applies to other external parties who wish to use our stories, images, name or logo.

Our values are aligned with the [Australian Council for International Development's Code of Conduct](#). In preparing this document a range of external sources were reviewed. These include the [Australian Government Department of Foreign Affairs & Trade Guidelines](#) and the [ACFID Guide on creating an EDMF](#).

Plus Education's commitment:

- As an organisation we are committed to the use of images and messages in communications in a way that portrays the people we work with in a manner that respects their dignity, values, history, religion, language and culture, and is authentic to the context, person and terms of consent given.
- We acknowledge it can be difficult to put our values and communication principles into practice when sharing stories – especially stories dealing with historical trauma, injustice, and the acute learning crisis in developing countries.
- We also acknowledge that unconscious bias plays a huge part in decision making and because of its very nature, it is difficult to address and mitigate the risks that it causes.
- We recognise that stories and images can be powerful calls to action, but acknowledge the context in which we work and make every effort to not diminish or overly simplify what is a complex web of socio-cultural and historical effects.
- Inevitably we can face conflicting demands. Misunderstanding cultural norms and mismanaging storytelling content can harm the people we strive to support in Cambodia and our organisation more broadly. We recognize this risk and make an effort to present every story as truthfully as possible, without causing any harm to the parties involved.



## 2. Updates and Governance

The Head of Foundation has responsibility for the regular review and updating of the ethical decision making framework, at least once every two years. However, updates may be required more often. All decisions on updates or changes to the EDMF or communications policy will be made in conjunction with the CEO and be subject to approval by the Board of Directors.

### Related Documents

This EDMF is connected to other Plus Education policies and procedures, including:

- Communications Policy
- Gender and Discrimination Policy
- Child Protection Policy
- Human Rights Policy
- Complaints and Feedback Handling Policy
- Risk Assessment and Management Guidelines
- Fundraising Policy
- Code of Conduct
- HR Manual

## 3. Accurate Communications

Plus Education is aware of the need for our communications to be appropriate, in context and intent, as well as being honest and timely. The approval process for all images and messages is outlined in our communications policy. No material should be published without the approval from the CEO. Failure to comply with this policy constitutes a breach of our Code of Conduct.

## 4. Making Ethical Decisions

Ethical decisions can be complex. When a situation has no clear 'right and wrong' answer, decision making can be difficult and require multiple conversations and deeper thought. More than one set of cultural norms and organisational values can equally apply to an issue, even if those norms and values are conflicting.

The process for coming to a decision on an ethical dilemma is set out in Sections 10, 11, 12 and 13. This EDMF includes a process which recognises and balances both donors and affected people but which gives primacy to the primary stakeholders.

## 5. Risk Assessment

Plus Education's approach to Risk management is outlined in our Risk Assessment and Management Policy. It details how risk is assessed according to an impact scale and a likelihood scale which combine to establish the risk priority and hence the importance of the relevant risk mitigation strategies.



In developing this EDMF, Plus Education has further considered the risks associated with our communication activities.

The risk matrix looks at individual cases of risk and how they might impact on:

- Contributors and the communities in which we work
- Staff and volunteers across the organisation
- Our governing body in Australia
- Our partners
- Supporters and the general public
- Overall activities of Plus Education
- The reputation of Plus Education and other ACFID members
- The legitimacy of the development industry as a whole

The Plus Education senior management team has the ultimate responsibility to identify and control risks on behalf of the Plus Education Foundation Australia Board and to discuss periodically the major risks with the Board.

## 6. Ethically Important Moments

This EDMF sets out the important questions we need to ask and explains when these questions ought to be asked throughout the storytelling and communications processes. It also explains who is responsible for having these discussions and what to do if a decision cannot be made. Below are seven ‘ethically important’ moments during the storytelling and publishing process, accompanied by key issues we could discuss at the relevant times.

Further details on how to address these ethically important issues are contained in section 11 and other pertinent policies.

	Moment(s)	Issues to Discuss	Who
Scoping	-Developing a storytelling concept -Scoping story leads	- Developing a storytelling concept - Assessing story leads	<ul style="list-style-type: none"> <li>• Project Manager</li> <li>• Program Officer</li> <li>• CEO</li> </ul>
Planning	-Planning a content-gathering trip or interview -Liaising with school authorities and community heads to arrange logistics	- What are the ethical considerations? - Is getting informed consent possible? (See Section 7c) - Protection of children and vulnerable persons (See Child Protection Policy)	<ul style="list-style-type: none"> <li>• Project Manager</li> <li>• CEO</li> <li>• Program Officer</li> <li>• HR Manager</li> </ul>



<b>Gathering</b>	- While on a content-gathering trip. This includes interviews for case studies, recording videos/ taking photographs	- Informed consent (See Section 7c) - Fuzzy boundaries / questioning (See Section 7f) - Power dynamics in the telling of a story (See Section 7a) - Power dynamics and voluntary consent (See Section 7c) - Connection to values - Privacy (See Section 7d) - Authorship and ownership (See Section 7d)	<ul style="list-style-type: none"> <li>● Project Manager</li> <li>● CEO</li> <li>● Program Officer</li> <li>● HR Manager</li> </ul>
<b>Post-gathering</b>	- Directly after gathering content in a school or community	- Documenting Informed consent or any challenges (See Section 7c)	<ul style="list-style-type: none"> <li>● Program Officer</li> <li>● Project manager</li> </ul>
<b>Design &amp; Creation</b>	- While creating materials to publish	- Connection to values - Honest portrayal (See Section 7d) - Authorship and ownership (See Section 7d) - Fuzzy boundaries (See Section 7f)	<ul style="list-style-type: none"> <li>● Project Manager</li> <li>● CEO</li> <li>● Program Officer</li> <li>● HR Manager</li> </ul>

## 7. Key ethical issues to be considered

Below we have listed some key ethical considerations which are relevant for our communications processes along with some questions to help us reflect on and discuss these issues as part of the decision-making process as outlined above. Some of these questions may be easy to answer while others are best considered in conversations with others, as outlined in the framework above.

### 7.1 Connection to values, principles and rights

- Is the conversation in keeping with our core values?
- Are we in keeping with our communications principles?

#### *Human Rights*

- Have we put the best interests of the contributor first?
- Have we respected the personal freedom and privacy of the contributor?
- Have we given the contributor control over how they are portrayed? In the case of a child have we also given the parent/guardian control?
- Have we ensured the content is accurate?
- Have we translated the piece (where appropriate) accurately?
- Does the story accurately portray the context and underlying issues we are looking to address while not being sensationalised?





- Does the story properly draw a connection between the subject and the issue?
- Are the power dynamics properly considered in the telling of this story?

#### *Children and Vulnerable persons' rights*

- Have we ensured the interests of Plus Education have not been put ahead of children?
- Have we adequately protected children and vulnerable persons?
- Have we respected the rights of all to dignity and respect?

#### *Women's rights*

- Have we considered how women are portrayed?
- Have we considered how gender-role stereotyping is portrayed?
- Have we given an adequate voice to women?

#### *Disability rights*

- Have we given people with disabilities the opportunity to contribute to this story where relevant?
- Have we considered how people with disability are portrayed?
- When published, will this story be accessible to people with disabilities?

## **7.2 Protection**

Plus Education puts the wellbeing of its stakeholders first. We explain how we protect our stakeholders in our Child Protection Policy, Gender and Disability Policy, Privacy Policy and Risk Assessment & Management Policy. All staff and relevant stakeholders must uphold these policies. There are no exceptions. However, there are also context-related issues that arise in relation to protection. These are:

#### *Protection of life*

- Could the contributor's life or safety be put at risk by sharing their story?

#### *Protection of dignity*

- Could we be putting the contributor or their community at risk of vilification?
- Have we considered how the contributor's family, friends and community might feel about the communications content?

## **7.3 Informed consent for images and messages**

Plus Education's informed consent process is clearly defined and outlined in our Communications Policy above. All staff and stakeholders must follow this process. There are no exceptions. However, there are also context-specific issues that arise in relation to informed consent.



These are:

#### *Correct information*

- Have we provided all the necessary information to the person providing consent?
- Have we shown the person providing consent examples of how the story might be used (including where it may be published and who will see it)?
- Have we consulted with the right people (including children's guardians, teachers and community members)?

#### *Clear comprehension*

- Does the contributor or the person giving consent fully understand the risks associated with sharing and publishing the story?
- Have we given the individuals involved enough advance notice about the project?
- Have we explained the communication process in a way the contributor fully understands (including children where practical), using the best possible language?
- Is there a point of contact at Plus Education for the individuals to discuss any issues during or after the process?

#### *Voluntary consent*

- Is there a power imbalance between the contributor and the organisation or individual staff members?
- If there is a power imbalance, can we articulate it?
- If there is a power imbalance, how can we reduce it?
- Does a power imbalance prompt the interviewee to make assumptions or allegations?
- Can we authenticate any allegations?
- Is there an element of duress in the contributor's consent?
- If there is an element of duress, how can we address it?
- Are we confident that the contributor understands that they are able to withdraw their consent at any time?

## **7.4 Privacy**

Plus Education values and upholds the privacy of those who contribute to our communications. All staff, governing body members, partners and volunteers must abide by our Privacy Policy. However, there are also context-related issues that arise in relation to privacy. These are:

#### *Protection*

- Have we adequately protected the privacy of the contributor?
- Have we discussed how the contributor's story may expose them to the public?
- If appropriate, have we adequately concealed the name, location and visual identity of the contributor?



### *Information storage*

- Have we safely and securely stored the contributor's personal information?
- Does the contributor understand how their personal information is stored and used?

### *Access to information*

- Who has access to the contributor's information and are they aware of who can access it?
- Have we explained how the contributor can access their personal information, make amendments to their story and withdraw consent?

## **7.5 Authorship and ownership**

We respect the right of contributors to control their stories. We respect the right of contracted writers and photographers to moral ownership of their works. While we always abide by our Privacy Policy, there are some discussions that can help us understand our responsibilities regarding authorship. These are:

### *Authorship*

- How will contributors be acknowledged when publishing their stories?
- Does acknowledgement of authorship have implications for the privacy or anonymity of contributors?
- What ethical obligations do contributors and content creators have to the truthful representation of stories and data? To the best of our knowledge are they telling the truth?

### *Copyright*

- Who owns the copyright of our communications content?
- Are there any conflicting copyright claims for communication materials we have published (or are seeking to publish)?

## **7.6 Fuzzy boundaries**

The communications process is often built on relationships, and sometimes the network of relationships is complex. We acknowledge that relational boundaries between contributors, content collectors, program staff and others can become blurred. In addition, the stories they create may be used to serve multiple purposes, such as fundraising, advocacy, and community engagement. This blurring of roles and purposes is referred to as 'fuzzy boundaries'.

We acknowledge there is the potential for the content collector role to become blurred in processes that involve building rapport with contributors. We also acknowledge that this potential is intensified in storytelling projects where content creators spend significant periods of time engaged in schools and communities. Questions asked should relate to responsibilities, boundaries and the central message of the communications piece.



Our discussions should ask:

*Content-creator responsibilities*

- How should we develop a relationship with the contributor?
- Should we explore how our unconscious biases affect this project? How might we change the storytelling process as a result of exploring our unconscious biases?
- What are the responsibilities that fall directly on the content creator?

*Other people's responsibilities*

- What are the different roles of those involved in the storytelling process?
- Does everyone in the project understand their role and others' expectations of them?
- How do we respond to any blurred roles and relationships during the course of the project?

*Blurred boundaries*

- How do we respect the personal relationships (and possible friendships) developed during the project?
- How do we respond to any blurred roles and relationships during the course of the project?
- What impacts do blurred roles have on the ethical conduct of the project?
- Can content collectors, contributors or others become personally over-invested?

## **8. Decision-making and uncertainty**

Making decisions about some of these issues can be difficult. There may be times when we are unsure whether an image, story or information should be used even after discussing the key issues and reviewing other policies and guidelines. If you have discussed the questions outlined above and need more information to make a decision, contact the Head of Programs, Head of Foundation or the CEO.

The final decision on all communications lies with the CEO.



## **Annexure B: ACFID Fundraising Charter**

**The ACFID Fundraising Charter requires that Members will have processes and procedures in place to ensure that:**

- Decisions to accept or reject donations support the purpose of the organisation.
- Legislative requirements for fundraising are met.
- The privacy of Donors, consistent with the Privacy Act, are met.
- Free, prior and informed consent is obtained for all images and stories.

**All fundraising materials will be truthful and:**

- Include the organisation's identity including name, address, ABN and purpose.
- Accurately represent the context, situation, proposed solutions and intended meaning of information provided by affected people.
- Clearly state if there is a specific purpose of each donation.
- Avoid material omissions, exaggerations, misleading visual portrayals and overstating the need or what the donor's response may achieve.

**If outsourcing fundraising activities, Members will ensure that:**

- Contracts are in place which meet all relevant legislative and regulatory requirements.
- Specific expectations, responsibilities and obligations of each party are clear and in writing.
- Members are identified as the beneficiaries of the funds.
- Contractors are clearly identified.

**Images and messages used for fundraising will not:**

- Be untruthful, exaggerated or misleading (e.g. not doctored, created as fiction or misrepresenting the country, etc.).
- Be used if they may endanger the people they are portraying.
- Be used without the free, prior and informed consent of the person/s portrayed, including children, their parents or guardians.
- Present people in a dehumanised manner.
- Infringe child protection policies and in particular show children in a naked and/or sexualised manner.
- Feature dead bodies or dying people.
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**Members have a clear ethical decision-making framework in place which aligns with the values of their organisation and the Code and includes:**

- A commitment to portraying affected people in a way that respects their dignity, values, history, religion, language and culture.
- A process that integrates a range of key staff in the organisation (e.g. communications, planning, child protection and CEO) in decision-making where appropriate
- Clear responsibilities for approval for public use of images and messages.
- A process which recognises and balances both donors and affected people but which gives primacy to the primary stakeholders.