

COMMUNICATIONS POLICY

BOARD APPROVAL: JULY 2016 BOARD APPROVAL: JULY 2018 BOARD APPROVAL: JANUARY 2022

NEXT REVIEW: 2026

1. INTRODUCTION

By collecting and sharing stories, images and videos about the people we work with, the Australian Himalayan Foundation can raise awareness about communities in the Himalaya, the type of work we do, and the impact of our work. In collecting, storing and sharing these images and stories, we have a responsibility to ensure that all content is collected and used ethically, honestly and sensitively, with respect for people's dignity and culture.

The Australian Himalayan Foundation follows relevant guidelines and principles in the ACFID Code of Conduct, Department of Foreign Affairs and Trade requirements, Australian Charities and Not for Profit Commission Standards, the Fundraising Institute of Australia Code of Ethics, and other relevant codes.

2. PURPOSE

The purpose of this Communications Policy is to provide a framework to ensure all communications, media and other public information published by and/or about the Australian Himalayan Foundation (AHF) and our work upholds our commitment to integrity, inclusivity and respect for all.

3. SCOPE

This Policy applies to all AHF personnel including AHF Board Directors, employees, volunteers, Ambassadors, contractors and program partners. It also applies to individuals or groups engaged on a short-term basis by AHF to assist with capturing, producing, sharing and promoting AHF communications. This includes but is not limited to photographers, visiting donors and fundraisers, and media personnel.

4. GUIDING PRINCIPLES

Transparency - In all communication with the public, AHF will act in an honest and transparent way. AHF will share appropriate information, in a timely and accessible manner, such as use of donated funds, financial statements and reports. We will not embellish, exaggerate, manipulate or alter meaning, facts, or context.

Inclusivity - AHF 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.

Compliance - All documents produced, for both internal uses and wider circulation, will comply with appropriate State and Federal laws, Department of Foreign Affairs and Trade (DFAT) policies and requirements, the ACFID Code of Conduct and Fundraising Charter, and the Fundraising Institute of Australia's Fundraising Code.

Integrity - AHF is committed to the values of partnership, respect and honesty and to the long-term effectiveness of aid and development. All public materials will be accurate and of high quality.

Consensual - AHF ensures that the use of images and messages portraying primary stakeholders is appropriate, accurate and consensual in line with AHF Guidelines (see below). (Refer to <u>Annex A</u>: AHF Guidelines for the Use of Images and Messages).

5. GUIDELINES

5.1 Collecting stories and images

- All AHF Directors, employees, volunteers, contractors and program partners must seek the appropriate permission and consent of primary stakeholders before collecting images, taking photos and documenting stories in the field.
- For children (under 18 years old) who are the beneficiaries of AHF-funded programs, permission must be provided by both the child and a parent/ adult guardian. (Refer to Annex B: The AHF Communications Permission Form.)
- In obtaining informed consent, AHF will ensure the person(s) involved understands:
 - Why their image story or personal details are being collected
 - Where and how they will be used and over what period of time
 - That their participation is entirely voluntary
 - That they do not have to be identified if they don't want to be
 - The potential risks and consequences of their image, name and words being published
 - That they may withdraw consent at any time, and that AHF will make all reasonable efforts to give effect to this request
- AHF will not identify a child by name or location in any AHF communications
- Advice should be sought from project partners on the appropriate permissions and on any potential risks related to using images and case studies.

AHF strictly prohibits any direct, unmediated contact between supporters and children (see *AHF Child Safeguarding* policy). All communication must be vetted by AHF to ensure child and supporter protection.

5.2 Storing data, stories and images

All case study data, stories and imagery will be stored on AHF's file servers and/or in the AHF office. AHF content will be stored with:

- Records of the origins of images and case studies
- Permissions, form of consent and copyright releases
- Key details including name, age, location, date, program association

• Photo data (such as file labels, meta data or text descriptions) do not reveal information about a child that could identify them, such as their name or location.

5.3 Publishing and sharing data, stories and images

AHF follows internal approval processes to ensure that public materials are checked for quality and accuracy, and they uphold our Guiding Principles (section 4).

When possible, AHF will endeavour to share the communication or publication with the person(s) featured.

5.4. ACCESSIBLE INFORMATION AND STAKEHOLDER ENGAGEMENT

The Annual Report will be prepared in accordance with the ACFID Code of Conduct guidelines and presented to all Members. AHF will also keep all Members, supporters and the broader community informed of its activities via: donor reports; the news section of the AHF website; quarterly newsletters (*Yakety-Yak*); quarterly Member communications; flyers and brochures; social media activities relating to AHF Ambassadors; and the Annual Report.

These activities maintain and develop support for and involvement in AHF from the Australian community. All publicity, associated press releases, fundraising proposals and other fundraising documentation will be prepared to reflect this Policy and will describe AHF's work and operations with honesty, integrity and accountability.

5.5 FUNDRAISING COMMUNICATIONS

AHF fundraising communications will clearly state the purpose for which funds are being raised, how money collected will be used, how money collected in excess of the required amount will be spent, and any other information as required by appropriate Federal and State Legislation, the ACFID Fundraising Charter, ACNC Governance Standards, ACNC External Conduct Standards, DFAT standards, and the Fundraising Institute of Australia (FIA) Code of Ethics and Professional Conduct).

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 to development activities only.

Our identity including name, address and Australian Business Number will always be provided on fundraising materials.

5.6. SOCIAL MEDIA

AHF encourages employees, volunteers, partners and Directors to use social media channels as a way to connect with stakeholders and promote AHF's work. While social

media is important and valuable to AHF, there are some risks that should be kept in mind when using these tools.

Protocols

In social media, the lines can often be blurred between what is public, private, personal or professional. AHF's various social media profiles (Facebook, Instagram and LinkedIn) are part of a conversation between real people. Activity on these platforms will:

- Use good judgment in all situations;
- **Be respectful** and always treat others (including,co-workers, donors, volunteers, partners and beneficiaries) in a positive and considerate manner;
- Be responsible and have the best interests of AHF at heart at all times; remain a
 positive advocate of AHF's work. While employees, volunteers and Directors have
 the right to express themselves online, they should take individual responsibility
 for contributions as an AHF representative on AHF channels;
- **Do not post photos without permission** including of children without the permission of a parent or guardian;
- Adhere to a **tone of voice** that is always educational, inclusive, respectful, neutral and empowering;
- Be ethical, although some employees, volunteers, partners and Directors are approved to represent AHF in social media, they must specifically state that the views expressed in their personal posts are their individual views if it is not AHF generated content or messages they are posting; and
- **Be humble** as AHF's goal is to make a difference to the families, children, and people in the Himalaya, we stay focused on working to make an impact on those that need it most in the Himalaya region.

AHF welcomes constructive feedback and makes best endeavours to respond to comments on AHF social media channels as quickly as possible. However, AHF reserves the right to remove any comments that are inappropriate due to inappropriate language, attacks on a single person or group, unsupported accusations, or spam that explicitly promotes a product or service. The AHF also reserves the right to remove people that don't follow this policy from its social media page and report to Facebook or Instagram if required.

If contact information is available, the AHF will notify comment authors personally to advise that their comments have been removed. AHF reserves the right to ban repeat offenders.

5.7. MEDIA

The CEO and AHF Chair are the key spokespersons authorised to speak to the media on behalf of AHF. Where information or public comment is requested or required by other AHF personnel, the Head of Fundraising and Communications, or the CEO or AHF Chair shall determine the most appropriate person to respond. Other employees, Board members, Ambassadors and volunteers are advised to ensure they are properly briefed and guided by the Head of Fundraising and Communications, CEO or Board Chair before talking to the media on any issue.

Employees, Board Directors, Ambassadors, volunteers and third parties are encouraged to deliver public presentations that summarise AHF's work and our goals, provided that they make it clear where such presentations are or are not authorised by the Foundation.

Significant statements on behalf of AHF shall be made as authorised by the Head of Fundraising and Communications, CEO or Board Chair as detailed above. It should always be made absolutely clear whether the views put forward regarding any issue relating to AHF are those of the organisation or of an individual. At all times consideration should be given as to how the correspondence may affect AHF's reputation.

Any filming or taping of AHF's programs or of the organisation's proceedings by the media is subject to prior permission by the Head of Fundraising and Communications, CEO or Board Chair.

Where media queries involve requests for information that will require substantial staff resources, such work must be authorised by the CEO. It will usually be necessary to provide information in addition to that which is requested in order to set the facts and figures in context. Requests for detailed information of this nature, whether from the local or national media, should be referred to the Head of Fundraising and Communications.

5.8. COPYRIGHT

All material created by employees, volunteers and consultants of AHF in the course of their engagement, irrespective of whether it is created using AHF facilities or materials, or during normal working hours, will belong to AHF. What constitutes the course of engagement will be determined by: the employee's/volunteer's position description and usual duties; or the consultant's contract and Terms of Reference.

Employees and volunteers of AHF should ensure that every publication of AHF including any books, newsletters, brochures, reports and computer software contains the following statement:

© Australian Himalayan Foundation, [Year of creation of material]

5.9. FUNDING PARTNERSHIP RECOGNITION

AHF is committed to promoting and recognising the Australian Government, private sector and individual donor support for their support of our international projects and programs. Examples include:

- encouraging and inviting visits by Australian officials and major donors;
- keeping Australian Embassy and High Commission personnel informed of work funded by the Australian Government and other major Australian funding bodies;
- ensuring beneficiaries understand where support is coming from;
- labelling and badging of project materials;
- ensuring signage used in-country acknowledges partner support; and
- ensuring that media releases refer to activities and achievements supported by funding partners (unless they have requested anonymity).

Specific approaches for acknowledging the Australian identity and support of the Australian Government, in line with DFAT's *Visual Identity Guidelines*, will include:

- the Australian Aid identifier on the AHF website
- Acknowledgement in quarterly newsletters that feature the ANCP-funded project/s
- all publications including the Annual Report
- Relevant event promotional material
- relevant social, digital media and e-marketing campaigns
- traditional print and radio media where it is permitted and relevant
- other donor reports on ANCP-funded project/s (e.g. for corporate donors end of financial year reports, end of project reports, and annual reports).

A wide range of activities (for example speeches at AHF supporter events, the work of AHF Ambassadors, and individuals involved in AHF fundraising treks) will represent a range of platforms to acknowledge the support of the Australian Government.

AHF will meet all requirements under DFAT contracts. This includes notification to DFAT whenever we become aware of information that may pose a reputational risk to AHF, its program or to DFAT as soon as AHF becomes aware of such information.

5.10. IN-COUNTRY PARTNERS

All program and project partners will be requested to comply with this Communications Policy through *Project Agreements*. AHF will provide partners with training and support to ensure they understand and can comply with their obligations regarding transparency and communication. Program partners are also supported in the development of their own policies and procedures for the collection and use of images and stories.

If partners are collecting images from the field, then AHF Communications Permission Form should be used. All communications developed by partners should reflect the above guidelines and all activities must be communicated to the public and the communities in which they work in an accurate and honest fashion.

AHF partners that receive ANCP funding will acknowledge the support of DFAT, and will follow DFAT's *Visual Identity Guidelines*, in public communications such as press releases, newsletters, annual reports, websites and project signage.

AHF will seek to ensure that program partners make a separation between development and non-development activities in fundraising material, other public communications and in program reporting. Ongoing dialogue between AHF and its partners will reinforce the definitions of development and non-development activities and the need for a separation between development and non-development activities.

5.11. COMPLAINTS

AHF welcomes feedback from all stakeholders, including our members, supporters, the Australian community, and partners and primary stakeholders in the countries in which it works. AHF's *Complaints and Whistleblowing Policy* and Complaints Handling Procedures will be made available on the AHF website. In other key communications, such as the Annual Report, AHF will ensure it is clear how complaints may be lodged.

Further, as AHF adheres to the ACFID Code of Conduct, it draws to the attention of its donors, supporters and members of the public that complaints can be made directly to ACFID if it is believed that AHF has breached any aspect of the ACFID Code of Conduct.

6. ROLES AND RESPONSIBILITIES

AHF's Board Directors are ultimately accountable for this Policy and all AHF organisational policies.

AHF's CEO has prime responsibility for ensuring that:

- Board Directors, employees, volunteers, Ambassadors, contractors, program partners and other representatives are familiar with their obligations under this Policy; and
- any breaches of this Policy are dealt with appropriately.

AHF Employees

The Head of Fundraising and Communications has primary responsibility for ensuring that all AHF publications and communications are accurate, up-to-date, accessible, respectful and compliant with this Communications Policy, and other related AHF policies (such as the *Child Safeguarding Policy; Privacy Policy* and *Development and Non-Development Policy*).

The Head of Fundraising and Communications also ensures that all public communications and all fundraising practices are developed in line with the ACFID Fundraising Charter, ACNC Governance Standards, ACNC External Conduct Standards, the

Fundraising Institute of Australia (FIA) Code of Ethics and Professional Conduct, and DFAT Standards.

All employees have a particular role in being aware of how they represent AHF in public. This includes the need to exercise good judgement and common sense in publishing on social media and always taking care not to purport to be representing the views of AHF. Employees are accountable for what they communicate.

REVIEW OF POLICY

AHF's Communications Policy will be formally reviewed every five years to assess its relevance and effectiveness and ensure it meets current standards and legislation. The Head of Fundraising and Communications will manage the review.

LEGISLATIVE AND REGULATORY FRAMEWORK

- Australian Privacy Act 1988
- ACFID Code of Conduct and Fundraising Charter
- The Fundraising Institute Australia (FIA) Code
- ACNC Governance Standards and External Conduct Standards
- DFAT Child Protection policy and associated guidelines
- DFAT Guidelines, Logo and Style Guide, and ANCP Manual

AHF Related Documents

AHF Privacy Policy

AHF Complaints and Whistleblowing Policy, and Complaints Handling Procedures

AHF Development and Non-Development Policy

AHF Child Safeguarding Policy

AHF Prevention of Sexual Exploitation and Abuse Policy

AHF Conflict of Interest Policy

ANNEX A: AHF 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.
- Inform key persons in images of what the image is being used for and obtain their permission
- When photographing or filming a child, please obtain the permission of the child and if
 possible a parent/guardian. See point below regarding children who are part of an
 AHF-funded activity.
- If a child being photographed is part of an AHF-funded activity, informed consent must be obtained from both the child and a parent/adult guardian* preferably before photographing or filming; definitely before using. See Annex B: AHF Communications Permissions Form.
- Portray children (under 18 years old) positively as part of their community and in a dignified and respectful manner.
- Do not create images of children where they are not adequately clothed and in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and facts.
- 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.
- 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.
- Ensure that those whose situation is being represented have the opportunity to communicate their stories themselves. E.G. Use local spokespersons to show that local people are actively involved in development or humanitarian work.

Note also, a "guardian" does not mean any adult that may be associated with the child. For example, a guardian is not a teacher or principal.

¹ Common sense should apply - a very small child will not be able to give written or verbal informed consent for their image to be taken or filmed. Therefore, the child's parent or guardian must provide the informed consent on their behalf. If an older child gives informed consent for their image to be taken or filmed, their parent or guardian must also give their informed consent.

ANNEX B: AHF Communications Permission Form CHANGE STORY AND VIDEO FOOTAGE – PERMISSION TO PUBLISH

For children (below the age of 18), who are beneficiaries of an AHF-funded project, please obtain permission from the child and the parent/ guardian (in writing or verbally), and also follow the guidelines in Annex A above.

Partner and project:		
Community/location:		
Interviewee Name: ²		
Pseudonym required? ³		
Address/contact:		
Interviewer:	Date:	

I give consent for my / my child's story and all still and moving images of me/ my child to be:

- used by AUSTRALIAN HIMALAYAN FOUNDATION for educational, fundraising, promotional and marketing material; and/or
- provided to any third party, including but not limited to partners, media organisations and not-for-profit organisations for the purposes of communicating, promoting and marketing the Australian Himalayan Foundation works.
- The stories and images may be used in various media formats including online media, social media, print, newspaper, report, video, public displays, television and electronic means of communication (eg. email) and in any edited form. I

² For children (under 18) in AHF-funded projects, list the name/s, and the name/s of the parent/guardian signing for them.

³ If possible, in the interview check with the person or their parent/guardian if a pseudonym is required. Even if declined, before publication re-check with the partner/interviewee if anonymity is required.

waive any rights and claims, present and future, to any fees or royalties or other benefits whatsoever for or in connection with the use of the Images.

- I understand that my involvement with Australian Himalayan Foundation's work will not be affected by my decision to give or refuse permission.
- If I wish to withdraw permission for my / my child's story and/or images to be used, I must inform the Australian Himalayan Foundation. I understand that if I withdraw permission, the Australian Himalayan Foundation will cease any future new publication or use of the story and images, but they may appear in printed and electronic material which has already been produced or disseminated.
- I understand that the Australian Himalayan Foundation will make all reasonable
 efforts to ensure that any use of my / my child's story and images will be used
 sensitively and will comply with the Australian Himalayan Foundation's
 Communication Policy and values by upholding my / my child's dignity and
 protecting me / my child. The Australian Himalayan Foundation will ensure images
 and stories are accurate and authentic, and where sensitivities exist, anonymity
 will be used.
- If AHF staff or representatives are using a camera with an in-built location identifier, we will ensure it is turned off prior to taking the photograph.
- AHF will always ask your permission before we take your/ your child's photograph
 or interview you/them. If you do not want photos taken or to be recorded, you/
 your child will not be photographed or recorded.

I have read or had explained to me the information about photographs, videos and audio recordings.	Yes No
Are you happy for you/ your child to be photographed or recorded?	Yes No

Name of person whose image is taken:	Signature of person whose image is taken:*		
*For persons under 18 years, the child and if possible a parent/guardian must give permission. If the child is a beneficiary of an AHF-funded project, both the child AND their parent/guardian must give informed consent by signing here, or verbally.			
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Name of legal representative, parent or guardian	Signature of legal representative, parent or		
if individual is under 18:	guardian if individual is under 18:		
Address:	Email address:		
State: Postcode:	Phone:		
Description of photo:			
Date of photo taken:			
If verbal consent was given but the person did not sign the form please tick here:			