



COMMUNICATIONS POLICY

APPLICABILITY: ACCI Missions & Relief Staff, Volunteers, Field Workers, Associates, Strategic Partners & Board Members (See Scope)

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INTRODUCTION

PREAMBLE

Good communication with our supporters is an essential component of the work of ACCI, our field workers and partners. Without good communication, it is difficult to maintain the support of donors, which in turn impacts our effectiveness and ability to achieve our goals. However, as crucial as our supporters are, protecting the interests, dignity and privacy of the communities, families and individuals we work with will always be our primary concern.

Promotions and communications should also not simply be a fundraising tool, but should also be viewed as a platform for informing and influencing the views and understanding of our networks in relation to the development and cross cultural ministry.

PURPOSE

The purpose of this policy is to provide clear guidance to ensure that our communications:

- accurately represent the vision, purpose and values of ACCI;
- act as tools that develop a healthy and balanced understanding of the issues we engage with; and
- above all protect the interests of our key stakeholders.

STATEMENT OF COMMITMENT

ACCI communications will:

- Respect human dignity and ensure the rights, safety and well-being of the people being portrayed.
- Ensure the collection of information, images and stories does not harm people or the environment.
- Reflect ACCI's values and beliefs, as outlined in the ACCI Vision and Mission Statement.
- Build public awareness, understanding and support for the purposes of international missions, development and relief.

SCOPE

This policy applies to all **ACCI Stakeholders** defined below.

- All ACCI **Staff** including but not limited to employees, contractors and consultants.
- All ACCI **Volunteers** including but not limited to office and event based volunteers.
- All ACCI **Field Workers**.
- All ACCI **Associates**.
- All ACCI **Strategic Partners** including any organisation receiving ACCI funding in Australia or abroad to implement activities including but not limited to community development, disaster response or non-development activities.
- All ACCI **Board Members**.

Note:

For the purpose of this policy, “ACCI Communications” includes all ACCIR (including Disaster Relief) and ACCIM marketing, fundraising and promotion materials and donor correspondences. It includes all images, film, stories, reports, online media, publications, website content and so forth.

GUIDING PRINCIPLES

ACCI complies with the following codes of conduct specific to promotions and fundraising:

- ACFID Code of Conduct;
- ACFID Fundraising Charter (See Appendix 1);
- DOCHAS Code of Conduct on Images and Messages
- Fundraising Institute of Australia’s Code of Ethics and Professional Conduct; and
- Extract from the Western Australia Department of Commerce: Voluntary Code of Practice for Public Fundraising (See Appendix 2)

1. ETHICAL GUIDELINES

1.1 PORTRAYAL OF LOCAL PEOPLE

ACCI aims to be highly conscious of how we portray people both in the language and images we use. Language and images should not only recognise the challenges and issues that people and communities face, but also show a positive way forward where individuals and communities are the key agents in their own transformation. ACCI encourages all partners to share communication material with those featured within images and stories.

In all communications, ACCI commits to:

- ✓ Presenting people, both adults and children, in a dignified and respectful manner.
- ✓ Giving due respect to the values, history, religion and culture of the people portrayed.
- ✓ Representing people in a holistic, accurate light with a sense of hope, highlighting their capacity and agency to impact their own future and act as key determinants in the development process.
- ✓ Highlighting and focusing on the context and complexity of a situation, rather than solely focusing on an individual's suffering.
- ✓ Use language free from labels and stigmas.
- ✓ Take care to avoid stereotyping certain groups (e.g. beware of the repeated use of images of particular ethnic groups, nationalities or genders when illustrating particular issues).
- ✓ Comply with local traditions and national laws in taking or reproducing images of people, children, objects or places.

In all communications, ACCI will avoid:

- ✗ Presenting people, including children, as helpless, dependent or to be pitied; where the donor or project is portrayed as 'saving' the subject. This requires assessment on an individual basis, but will generally eliminate images with crying, or unclad children which are deemed to be emotionally exploitive.
- ✗ Using any images or language which may be derogatory, discriminatory or violent.
- ✗ Using only images which contain just children to represent issues that affect the broader community. This is to avoid giving the false impression that the response to the issue needs to be directly targeted towards children in isolation from the rest of the community. Children should be shown with their families, their communities and/or siblings or other groups of children.

1.2 TRUTHFULNESS OF MATERIAL

ACCI aims to ensure that in all its communication the issues, communities and people we work with are represented and portrayed truthfully, accurately and in context. Project impacts should be reported truthfully, not exaggerated, and where there are multiple factors that contributed to the impacts, of which the project is one, this should also be communicated.

In all communications, ACCI commits to:

- ✓ Ensuring information, images and captions are truthful and represent the issue, person and community accurately.

- ✓ Ensuring images are used in context and are correctly attributed to programs and photographers. Disclosures should be used where there is risk of misunderstandings.
- ✓ Using images and interview content ideally within the year they are obtained, and ideally for a maximum of 5 years after which content should be archived and used only for historical pieces.

In all communications, ACCI will avoid:

- ✗ Oversimplifying the diversity of communities, individuals, and the context in which they live.
- ✗ Presenting any misleading or deceiving information or images that may create a false impression or misunderstandings.
- ✗ Exaggerating facts, sensationalising issues or making claims which cannot be fulfilled.
- ✗ Editing photos or film to alter context. If photos are edited to protect identities, this must be noted and explained.
- ✗ Using images in a 'generic' fashion to illustrate subject matter when there is in fact no connection between the image and the content of the material illustrated.
- ✗ Using images of nationals from one country to represent nationals from another country.
- ✗ Evoking a donor response in a manner that is manipulative and does not align with ACCI's values of integrity and transparency.
- ✗ Oversimplifying issues, their causes and solutions as this does not give the donor the opportunity to respond to and make an informed decision about their involvement based on the real circumstance and facts.

1.3 CONSENT FOR STORIES AND IMAGES

As a part of showing respect for the people and communities we engage with, we should seek permission from individuals before capturing or publishing people's images and stories. ACCI recognises that there are a broad range of factors that need to be considered when gaining consent and that not all circumstances will fit in a neat category. In such 'grey' circumstances, ACCI seeks to put the best interests of the person first and use common sense and wisdom. If in doubt about whether proper consent has been gained, it is safer to avoid using the image or story altogether.

Types of Consent

- The two different levels of consent are verbal and written.
- Both verbal and written consent should also be **informed consent**, which means that the person understands where the image/story will be used, what information will be revealed, and is given an opportunity to place stipulations around their story (e.g. such as not revealing identity, time limitation, or not being published on the internet).
- When gaining informed consent, ACCI encourages partners to use an example of the kinds of communication material produced, so that those involved understand how their image, information and/or story will be used.
- It is also important to make special considerations to those with higher vulnerabilities such as children, people with disabilities and survivors of exploitation, abuse and/or disasters and ensure they have the power and agency to make an informed decision.
- ACCI respects a person's right to refuse to be photographed or have their story recorded and will refrain from taking a photo or recording a story if the subject shows any reluctance or confusion. Subjects also have the right to withdraw permission, even after a story or photo is published.

Determining which Type of Consent

- Determining which consent is required is based on the nature of the image/story and the final output of the image/story.
- Verbal consent should almost always be gained, except in very limited circumstances where individuals cannot be clearly recognised or identified and therefore no consent is required.
- Written consent is required when:
 - Individuals are **identifiable**.
 - Note there is a difference between ‘recognisable’ and ‘identifiable’. Recognisable means that the subject could be recognised by someone that knows the individual but no other significant information is revealed. Identifiable means that additional information is revealed that would allow the person to be clearly identified, which could include information shown in the image itself (e.g. name badges, school uniforms, well known locations) or information accompanying the image when published (e.g. names, locations).
 - Subjects are also considered identifiable where substantial information about their story, testimony or circumstance is revealed, such as in a case study or interview.
 - Images/stories are of a **sensitive nature**, which includes:
 - Culturally sensitive, politically sensitive, taboo or high-stigma issues.
 - Clinical settings (e.g. hospitals, clinics, with midwives/nurses) or private settings (e.g. private home, classroom).
 - When a child is the sole subject of an image which accompanies a story of a sensitive nature and implies the issue pertains to the child.
 - Any situation where individuals may be put at risk or face stigma (refer to Section 1.5).
- When written consent is required, the ACCI Consent Form will be used (Appendix 3). In order to comply with the written consent requirement, it is recommended that:
 - Consent forms are translated into local language.
 - An interpreter is engaged and used for extensive photographic shoots or videography in order to explain and communicate the purpose of the photographs/footage and to gain informed consent.
 - A record be kept by the photographer/videographer for any photograph/footage taken for which written consent was not gained due to illiteracy, but for which informed verbal consent was gained. This record needs to be provided along with the images/footage to the ACCI media department.
- ACCI recommends that field workers and partners also develop similar guidelines and strategies around gaining appropriate consent for images and stories. Field workers and partners can use their own consent forms if they incorporate the information covered in the ACCI Consent Form (Appendix 3).

Summary of Consent

Circumstance	No consent	Verbal consent	Written consent	Examples
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Individuals are neither recognisable nor identifiable	✓			<ul style="list-style-type: none"> • Wide angle shot of people playing, working or participating in an activity. • Wide angle b-roll footage at a public location. • Images from creative angles that do not show people's faces or any defining features.
Individuals are recognisable		✓		<ul style="list-style-type: none"> • Group shots of people. • Portrait of a person with no other substantial information revealed. • Mid-length or close-up b-roll footage at a public location. <p><i>*Where people/locations do not meet sensitive or high risk criteria.</i></p>
Individuals are identifiable			✓	<ul style="list-style-type: none"> • Image that clearly identifies and provides substantial information about a person. • Image with captions including names. • Image that shows easily identifiable locations or landmarks. • Individual is the sole focus of a story/case study.
Images/stories are of a sensitive nature			✓	<ul style="list-style-type: none"> • Images of people with HIV/AIDS. • Images of families in their private homes. • Images of children in classrooms. • Images of children next to a story discussing orphaned and vulnerable children. • Image of a Christian in a country where they may face religious persecution. • Images of survivors of exploitation, abuse and/or disasters.

Please note that informed consent does not override evaluating the risk of situations. Each situation is required to be assessed using the 'managing levels of risk' table.

Children and Consent:

- When taking photographs or recording stories of a child under 14 years old, or a child aged 14-18 years old that cannot give informed consent, consent must be gained from a parent or guardian.
- Parents/guardians are not able to consent to children being photographed or participating in activities that are in breach of the ACCI Child Safeguarding Policy.

1.4 PORTRAYAL OF SENSITIVE ISSUES

Specific care should be taken when portraying sensitive issues or high risk populations such as the vulnerable children, survivors of abuse or exploitation and victims of disasters. These issues should be portrayed accurately, using language and images in accordance with relevant guidelines specific to these issues, and in a way that avoids depicting people into over simplified victim or villain roles.

Portraying children including orphaned, vulnerable or unaccompanied children

Children's situations often evoke particularly strong responses, however we must be careful not to exploit this and instead put the child's best interests and safety above the desire to share an impacting image or story.

In all communications, ACCI commits to:

- ✓ Respect the rights of every child including their:
 - Rights to protection from harm and retribution;
 - Rights to privacy;
 - Rights to have their opinions heard; and

- Rights to participate in decisions affecting them.
- ✓ Ensure that the best interests of each child are protected over any other consideration, including over advocacy for children’s issues and rights.
- ✓ Ensure children are presented in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- ✓ Take a child’s views into account in accordance with their age and maturity.
- ✓ Assess and comply with local laws, traditions or restrictions for reproducing personal images of children.
- ✓ Interview children in a sensitive manner and only when a parent or guardian is present.
- ✓ Present the context of the child accurately and the role or impact of the project in context of other supporting factors in the child’s life (e.g. family, community, local church or support group).
- ✓ Ensuring children’s private information is not made publically available including details of their specific location. Therefore, the GPS tracking function must be disabled on equipment when filming or photographing children.

In all communications, ACCI will avoid:

- ✗ Publishing a story or an image which might put the child, siblings or peers at risk even when identities are changed, obscured or not used.

Portraying people who are survivors of abuse or exploitation

Media and communication has the ability to be used as a positive tool for advocacy, but can also be used to inflict a “second victimization” upon victims or survivors by re-enhancing their feelings of violation, shame, disorientation, and loss of control.

In communications portraying survivors of abuse or exploitation, ACCI commits to:

- ✓ Only using content for a maximum of 2 years unless otherwise specified by the interview subject.
- ✓ Ensuring interviewers are properly trained to interview adult or child survivors of violence, abuse or exploitation. This may include need for the interviewer to be trained in psycho-social counselling.

Portraying people affected by disasters

During a disaster, especially in the initial response stage, extra care and sensitivity should be taken when collecting information, images and stories. We must be conscious that people affected by disasters are especially vulnerable during this time and may be experiencing trauma and shock.

In disaster relief communications, ACCI commits to:

- ✓ Taking extra consideration when asking survivors for informed consent, as due to their vulnerable state they may feel compelled to give consent and incorrectly presume that declining may impact their ability to access benefits.
- ✓ Never using stories or images if there are doubts around potential risks as it is also often very difficult in disaster situations to adequately assess risk of harm or stigma.

In disaster relief communications, ACCI will avoid:

- ✘ Asking survivors to share their stories for communication purposes in the immediate aftermath of a disaster. Generally, stories should only be recorded during this initial stage if a person tells their story without being asked and when you can ensure that they have freely given consent for the information they have shared to be used. The recovery stage of a disaster is a much better time to collect stories from survivors.

1.5 MANAGING LEVELS OF RISKS

Individuals or groups may be put at risk of stigma, reprisal, violence or rejection in their communities as a result of exposing their identity or story. A person’s safety, privacy and reputation should always be put above the value and importance of using their story or image.

In all communications, ACCI commits to:

- ✓ Assessing the risks of harm or stigma to the subject. When publishing stories or images, ACCI will follow the below guidelines regarding what can be revealed based on the level of risk of harm and stigma:

Risk Level	What Can Be Revealed
Low Risk:	Faces, full names and geographical location may be revealed.
Medium Risk:	Faces, pseudonyms (limited cases first names will be permitted) and vague geographical location may be revealed.
High Risk:	Faces and visuals to be concealed, pseudonyms to be used and locations will be changed.
Significant Risk:	ACCI will not publish any information or images when there is significant risk of harm and stigma. <i>The only exception is when an individual strongly expresses a desire for their story to be told and ACCI decides to respect the subject’s right to tell their story as an act of advocacy. In these cases, the subject must give written consent and fully understand the risks and how the story will be used. Great caution should be exercised in these situations.</i>

Note: Children are much more vulnerable to abuse and exploitation. For this reason, ACCI will consider all children to be ranked as medium or high risk and act accordingly in all promotions and communications activities.

2. OTHER GUIDELINES

2.1 GENERAL GUIDELINES

- ACCI will ensure we make clear the purpose of all donations.
- Identifying information about ACCI should also be included in key publications and our websites, including phone number, address, website and ABN.
- Generally, key ACCI publications will be read and/or discussed with the General Manager before being published.

2.2 DEVELOPMENT AND NON-DEVELOPMENT ACTIVITIES

- ACCI will clearly and consistently distinguish development activities from non-development and evangelism activities in both communications and practice.
- Any combined communication materials of ACCIR and ACCIM will specify the distinction between the two organisations, and clearly offer donors the option of supporting aid and development activities only.
- In all fundraising material, there will be clear communication regarding the tax deductibility of donations.

2.3 PARTNER ORGANISATIONS & AGENCIES

- ACCI will appropriately reference and credit any overseas partners and implementing agencies involved in activities, projects and disaster relief appeals.
- ACCI will ensure that when working in partnership with other organisations, these partnerships are mentioned and ensure our role in the project or initiative is not overstated.
- When using images of activities carried out by other organisations, we will ensure that they are credited even if implementing programs our behalf.
- ACCI will not denigrate other agencies or organisations by making false or misleading statements, but ensure communication is respectful of the role of other organisations and agencies.

2.4 ANNUAL REPORTING

An Annual Report will be made available to staff, stakeholders, partners, donors and the wider public.

The ACCIR Annual Report will contain the following:

- A statement of ACCI's mission and value;
- A financial summary report in addition to a plain language summary regarding financial health;
- Summary of activities;
- Details of Board of Management;
- A report by management;
- Statement of commitment to full adherence to the ACFID Code of Conduct; and
- Identification of the ways to lodge complaints, either against ACCI or regarding a breach in the ACFID Code of Conduct. Contact details must also be provided for each of the complaint options.

The information contained in these annual reports shall be an accurate reflection of ACCI's pursuits and achievements.

2.5 FINANCIAL INFORMATION

- ACCIR financial summary reports will be made publicly available each year in our Annual Report.
- Full financial statements for both ACCIM and ACCIR will be available for download from our website, and this will be made known in any published material that references financial summaries or other financial details.
- Fundraising/promotions and administrative costs will also be made available. ACCI will avoid giving donors the impression that there are no administrative costs incurred and will honestly disclose costs incurred in each donation program. For any programs where 100% of funds are directed to the program, ACCI will disclose how the administrative and overhead expenses are being covered.

2.6 LEGAL FUNDRAISING REQUIREMENTS

- ACCIR complies with all State and Federal laws on fundraising and on Australian Taxation Office rulings and regulations. ACCI is legally required to operate within each State's parameters, and acquire the appropriate registrations or exemptions.
- Each state has its own requirements for public fundraising registration. Accordingly, ACCI has a file of public fundraising requirements and various State contact details, which need frequent monitoring to ensure compliance.

Fundraising Contracts, Agreements & Third Party Services

ACCI typically does not make contracts or agreements with professional fundraisers to act on behalf of ACCI. In the event that third party fundraising is sourced, the following conditions will be met:

- All contracts and agreements with the third party will be put in writing. Expectations, responsibilities and obligations of each party will be clearly described in the contract and understood by each party.
- All contracts will meet applicable legislative, regulatory requirements and state/territory conditions.
- ACCI is to be acknowledged as the recipient of donations in all fundraising activities.

2.7 COPYRIGHT

- When publishing an image ACCI will ensure we have permission from the photographer or copyright holder. The name of the photographer and/or the source of the image must also be included.
- Whenever stock photography is used, ACCI will ensure that copyright laws have been followed. This may include:
 - Buying licences.
 - Gaining written permission.
 - Sourcing from websites which freely allow images to be used (e.g. Creative Commons).

2.8 MEDIA

- In all matters pertaining to discussions with the media it is the Director or the General Manager who will respond or appoint a given staff member to respond on their behalf.

- With regard to interviews granted to the media on any particular aspect of ACCI operations or policy it is preferable that a list of questions be submitted first which can then be answered in writing. If this is not possible an audio recording should be maintained of the interview for future reference.
- At all times the mission and core values of the organisation should be enunciated.

APPENDICES

APPENDIX 1: THE 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.

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.

APPENDIX 2: EXTRACT FROM THE WESTERN AUSTRALIA DEPARTMENT OF COMMERCE: VOLUNTARY CODE OF PRACTICE FOR PUBLIC FUNDRAISING

Before Commencing Fundraising

Members of the public provide funds in response to appeals to promote or aid a cause from which they may not obtain any personal material benefit, but usually do so on the understanding that some part of any donation or purchase is to go toward the aims of the organisation. In deciding whether to undertake a fundraising activity an organisation should ensure that it:

- raises funds only for a justifiable need;
- avoids offensive advertising or promotions; and
- respects the privacy needs of donors at all times.

Fundraising campaigns involve varying degrees of invasion of privacy. Therefore, respect donor privacy in all cases.

Do not sell or otherwise make available personal details of a donor for use in campaigns by other organisations without the permission of that donor.

Take care in ensuring fundraising is conducted in a friendly manner and recognise that it is the individual right of the members of the public to decide for themselves whether to donate, make a purchase, or not. Avoid aggressive conduct during fundraising campaigns. It can harm donor willingness to give in the long term.

Conducting Public Fundraising

This section discusses recommended practices and guidelines for the conduct of public fundraising.

- State clearly at all times the specific objective of the fundraising campaign and the proposal to be funded
- The aim of this guideline is to provide an informed basis upon which the public can base decisions to participate, and as a means of accountability to the public.
- Donations and purchases are made in good faith. Members of the public have a right to be assured that funds given in support of a specific purpose are in fact applied to that purpose. Accordingly, in any fundraising:
 - State the specific cause being funded on all promotional material;
 - Apply the funds raised to the purpose for which they were raised;
 - Upon receiving a request asking where funds received were applied, inform the donor or a purchaser; and
 - Keep records of donations and purchases made, and of where specific donations have been applied.
- When a donation or purchase is solicited, tell the donor or purchaser, how much of the funds raised will be used to meet the costs of raising the funds
- Ensure the organisation uses its best endeavours to be able to inform donors or purchasers of:
 - the projected costs associated with raising funds;
 - the net proportion of the funds raised which it intends will be returned to the objectives being funded; and
 - the actual costs incurred in raising funds and the net proportion returned to the objectives being funded.

In calculating these costs, make allowance for all direct and indirect costs to the extent that they can be ascertained, including but not limited to the following:

Fees or commissions, hire of premises or equipment, promotion or marketing costs, postage, printing/ artwork, prizes or other goods, telephone, stationery (including tickets), salaries and wages (both temporary and ongoing) and any related costs, reimbursements to volunteers and relevant ongoing overheads such as electricity, rent, building maintenance, general administration costs. Where an indirect cost cannot be ascertained, make a fair allowance for it.

On all promotional materials and on request, clearly disclose organisational details and any commercial fundraising contractors employed.

The public should have access to as much information on the organisation as possible. Promotional material should state:

- the name of the organisation;
- the street address and phone number of the organisation;
- its charitable collections licence number (if applicable);
- the permit number if a raffle or street collection is involved; and
- the name of any commercial fundraising contractor involved.

Identification of Collectors

Identify every collector by requiring them to wear a name tag which clearly discloses:

- the information contained in 3.3 (a) and (b);
- the name of the collector; and
- whether the collector is voluntary or paid.

Complaints

Establish procedures for handling complaints from the public and train office staff and collectors in handling complaints courteously.

If the refund of a donation is requested, consider making a refund where:

- the donation was made for a specific purpose but, at the time of the request, has not been applied to that purpose; or
- the request is made by the personal representative of a person of unsound mind; and
- the request is made within a reasonable time after the donation was made.

A refund could be made in any circumstances or for any reason which the organisation considers appropriate. Comply with a donor's or purchaser's request that they be excluded from any future mailings.

Raffles and Gaming

Raffles may be conducted amongst existing donors to or purchasers from the organisation by mail or direct solicitation.

Do not mail raffle books or tickets to members of the public who are not also existing donors to or purchasers from the organisation without first gaining their individual approval.

Ensure that any permit required under the Gaming Commission Act 1987 is obtained and that the raffle is conducted in accordance with the conditions of any such permit and the requirements of the Act.

Commercial Fundraising Contractors

Ensure that any contract with a commercial fundraising contractor is made in writing.

This section sets out some basic negotiating suggestions when establishing the terms of a contract.

Make sure the contract sets out:

- procedures by which the total donations will be paid into the organisation's accounts and not passed on through the contractor;
- the method of remunerating the contractor;
- how the costs of the fundraising to be conducted will be paid and by whom;
- the estimated return the organisation is to receive as a percentage of the gross funds raised;
- how any losses that occur will be allocated;
- the circumstances in which campaigns can be terminated and the procedures to follow for termination.

Ensure that:

- fundraising in aid of a registered charitable organisation has the prior written approval of that organisation;
- the organisation on behalf of which the funds are being raised has control of the process of accountability and handling of funds and the public statements to be made relating to any fundraising; and
- the organisation on behalf of which the funds are being raised has the right to conduct an independent audit of the funds raised and the expenses of raising the funds.

Accounting Procedures

All organisations and individuals covered by this code are required to produce accurate information relating to public fundraising to ensure accountability to donors. Records must be kept in such a manner as will ensure that funds raised from the public are properly accounted for and the results of fundraising activities are verifiable. This requires that certain accounting procedures and standards be adopted.

Information contained in the financial statements is an important factor in determining estimates of fundraising returns to be used in promotional materials for future fundraising campaigns, as well as to satisfy public enquiries into the organisation's fundraising costs.

A recognised accounting method is to be used.

Australian Accounting Standards must be complied with in the preparation of accounts.

Reporting Fundraising Income and Expenditure

Financial statements must include:

- a balance sheet; and
- an income and expenditure statement

The income section of the income and expenditure statement must:

- clearly describe each type of fundraising activity conducted and avoid the use of general terms such as "fundraising".
- list separately each different type of fundraising activity conducted. Do not aggregate the results of different types of fundraising activities. It is acceptable to aggregate the results of identical fundraising activities. For example, the revenue raised from three raffles conducted in a year may be aggregated.

The expenditure section of the income and expenditure statement must:

- separately list the expenses for each type of fundraising activity listed in the income section;
- include all direct costs of fundraising in addition to a fair apportionment of relevant and identifiable indirect costs and overheads.

Note: Section 3 of this code lists some indirect and overhead fundraising costs.

The apportionment method must be clearly stated in the notes to the accounts and remain consistent from year to year. Where a change in the apportionment method occurs, this must also be clearly stated in the notes.

Disclosure: Make annual accounts publicly available at a nominal fee.

Receipting Donations: Receipt and record all donations.

Cash Handling

Cash handling procedures must require:

- two persons to be present for the processing of all unreceipted cash donations and money boxes;
- clear rules for petty cash management;
- the issue of a receipt and the retention of a duplicate, regardless of the amount involved, for any donations made in face to face fundraising outside the organisation's offices;

- money boxes to be sealed in a tamper proof manner, numbered and a record kept of where they are placed.

Cheques: All cheques must be signed by not less than two persons.

Auditing

- Prepare annual accounts and have them audited and submitted to the Committee within 4 months of the end of the financial year.
- Use an independent approved auditor to audit accounts, except where the gross value of funds raised in the year is less than \$2,000, where the audit may be undertaken by any independent person.
- Ensure accounts are signed by the auditor as well as a person responsible for their preparation.
- Comply with any conditions attached to licences issued under the Act in relation to approved auditors.
- Retention of Accounting Records
- Retain records for not less than 5 years.

Organisational Structure

Except in the case of one off fundraising, establish a structure which has the following elements:

- a formal constitution;
- an appointed public officer;
- a clearly defined and established board, committee or other management structure which has the authority and power to regularly review reports of fundraising activity and make and implement decisions as to the consequence of any such review.

Adoption of the Code

An organisation which adopts this code and applies the principles set out in it will:

- a) do so by formal resolution of the body referred to in paragraph (c) in section 7 of this code; and
- b) advise the Committee in writing of its decision to do so.

After advising the Committee, the organisation may include in any of its promotional or advertising material the statement: "[Name of organisation] complies with the Voluntary Code of Practice for Public Fundraising in Western Australia."

An organisation which has adopted and is applying the principles set out in this code will include with the annual accounts it submits to the Committee a statutory declaration concerning its compliance with the code.

APPENDIX 3: INTERVIEW AND IMAGE CONSENT FORM

The purpose of this form is to gain consent to interview and capture images of project beneficiaries and participants for use in ACCI publications/promotions. All content must be sourced according to the ACCI Communication Policy. Please Note: This form should be translated for non-English speakers.



PART 1: CONSENT OF SUBJECT

1.	I consent to my story and image being recorded and published in ACCI publications and promotional materials both in print and online. I understand that my story can be downloaded from the internet and may be accessed by anyone. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Only Print
2.	I consent to my story and image being used by ACCI for the next 5 years (or until I revoke my consent). <input type="checkbox"/> Yes <input type="checkbox"/> No – If no, please state how long you consent for your story and image to be used by ACCI: _____ (Note: In the case of survivors of abuse or exploitation, content will be used for a maximum of 2 years unless otherwise specified by the interview subject)
3.	I consent to ACCI using my name and the personal details I disclose in my interview in ACCI publications and promotional materials. <input type="checkbox"/> Yes <input type="checkbox"/> Yes, but I would like to OMIT the following details: <input type="checkbox"/> No <input type="checkbox"/> Name <input type="checkbox"/> Age <input type="checkbox"/> Specifics of any condition I may have <input type="checkbox"/> Location <input type="checkbox"/> Other (Please specify) _____

I wish to make the following extra requests:

PART 2: DETAILS OF SUBJECT

Name of person being interviewed/photographed: _____ Age (if a minor): _____

Location: _____ Project: _____

Signature of subject: _____ Date: _____

PART 3: PARENT/GUARDIAN CONSENT

- If the person is under 14 years old a parent or guardian must give consent.
- If the person is 14-18 years old but, in your opinion, is unable to give informed consent, a parent or guardian must also give consent.

Parent/Guardians name: _____

Signature of parent/guardian: _____ Date: _____

PART 4: ACCI STAFF/FIELD WORKER/PARTNER

MANAGING LEVELS OF RISKS:

When ACCI staff/Field Workers wish to use images or information about an individual, they should assess the risks of harm or stigma to the individual and act according to the table below in all promotions and communications activities.

As children are always more vulnerable to abuse and exploitation, **ACCIR will rank all children as medium to high risk.**

LEVEL OF RISK OF HARM OR STIGMA:	HOW TO ACT ACCORDING TO LEVEL OF RISK
LOW	Faces, first names and geographical location may be revealed.
MEDIUM	Faces, pseudonyms and vague geographical location may be revealed.
HIGH	Faces & visuals to be concealed, pseudonyms to be used and specific locations will not be revealed.

Is the person a survivor of abuse or exploitation:

- Yes No

Is there a risk of harm or stigma to the person if this story is published?

- No
- Yes, Medium Risk - If yes, please state below the reason why and any recommendations:
- Yes, High Risk - If yes, please state below the reason why and any recommendations:

Signature of Staff/Field Worker/Partner: _____ Date: _____

APPENDIX 4: COMMUNICATION TOOL



Communication Tool

Checklist for obtaining and publishing communications content

See ACCI Communications Policy for more information. If you are unsure about any of the below factors, please discuss with an ACCI staff member before obtaining and/or publishing content.

SECTION 1: GENERAL QUESTIONS

Question:	Action:
<input type="checkbox"/> Is all information, images and captions truthful ? <i>Represents the issue, person and community, context and complexity accurately</i>	<input type="checkbox"/> All boxes ticked → Continue checklist <input type="checkbox"/> Not all boxes ticked → Do not use image or story
<input type="checkbox"/> Have you ensured that material is not used to mislead audience to false impressions or misunderstandings? <i>Facts are not exaggerated; issues are not sensationalised, and claims are not made that cannot be fulfilled</i>	
<input type="checkbox"/> Are all individuals represented in a dignified and respectful manner ? <i>Respect given to the values, history, religion and culture of those portrayed</i>	
<input type="checkbox"/> To your knowledge, have all local laws or traditions been abided by ?	
<input type="checkbox"/> Has content been attributed to relevant programs and photographers (if relevant)?	
<input type="checkbox"/> Is the image or story free from stigmas, labels and stereotypes ?	
<input type="checkbox"/> Is the material displayed in a hopeful lens ? <i>Highlighting individual and community's capacity and agency to impact their own development process</i>	

SECTION 2: TIMEFRAME

Question:	Action:
When has the content been obtained?	<input type="checkbox"/> Within last year → Continue <input type="checkbox"/> Between 1 or 5 years ago → Consider renewing consent if needed → Do not use if the person has specifically stated on consent form a time period which has expired <input type="checkbox"/> 5 years or older → Re-consider use. Ideally only use for historical pieces → Do not use if the person has specifically stated on a consent form a time period which has expired

SECTION 3: CONSENT

Question:	Action:
<p>Is the person recognisable or identifiable?</p> <p><i>Recognisable means that the subject could be recognised by someone that knows the individual but no other significant information is revealed</i></p> <p><i>Identifiable means that additional information is revealed that would allow the person to be clearly identified, which could include information shown in the image itself (e.g. name badges, school uniforms, well known locations) or information accompanying the image when published (e.g. names, locations).</i></p>	<ul style="list-style-type: none"> <input type="checkbox"/> Person is barely recognisable (e.g. Wide-angle shots, b-roll footage, creative angle shots that do not show defining features) <ul style="list-style-type: none"> → <u>No consent</u> needed. Continue checklist to determine if consent is required for other reasons <input type="checkbox"/> Person is only recognisable including: <ul style="list-style-type: none"> ○ No full name/s ○ No identification of any individual ○ No location name or image with identifiable features (e.g. <i>Signs, landmarks</i>) ○ No accompanying detailed case study → ensure informed <u>verbal</u> consent has been gained from adult or child’s guardian. <input type="checkbox"/> Person is identifiable, including any above details: <ul style="list-style-type: none"> → ensure informed <u>written</u> consent has been gained from adult or child’s guardian (<i>Note: This could be part of an enrolment process</i>)
<p>Does the story or image contain any sensitive or stigma issues:</p> <ul style="list-style-type: none"> ○ Images of people with HIV/AIDS. ○ Images of families in their private homes. ○ Images of children in classrooms. ○ Images of children next to a story discussing orphaned and vulnerable children. ○ Image of a Christian in a country where they may face religious persecution. ○ Images of survivors of exploitation, abuse and/or disasters. 	<ul style="list-style-type: none"> <input type="checkbox"/> If yes, <ul style="list-style-type: none"> → ensure informed <u>written</u> consent has been gained

SECTION 4: RISK MANAGEMENT

Question:	Risk
<p>Consequences: What are some potential negative consequences of posting this image or story? Consider the risk rating of these consequences.</p> <p><i>Consequences can be of physical, emotional, psychological, social, financial, individual or organisational nature</i></p>	<p>Low (1)</p> <p>Where the outcome would have a little to no impact, which would be expected to last only a short time, if any.</p> <p>For example: Someone is recognised in a photo and story about an agricultural project they are involved in, by a member of the same community who had not heard of this story before it was published but has no real negative effects.</p>
	<p>Medium (2)</p> <p>Where the outcome would have some impact, which would be expected to last a short or medium length of time.</p> <p>For example: An organisation running a community-based program publicised an image and story about one of their beneficiaries. This individual didn't like how they were portrayed and felt like</p>

	<p>they weren't properly consulted which lead them to believe that all the organisation cares about is getting money. As a result, the individual's family left the program.</p> <p>High (3) Where the outcome would have a high impact, which could be short, medium or long term.</p> <p>For example: An individual shares a testimony that includes information on the community's habits on a 'taboo' topic and when the community hear this story through the publication, many community members avoid this individual and stop buying from their small business. This results in the individual being marginalised and having emotional ill health for some time.</p> <p>Significant (4) Where the outcome would have a significant impact, which would be expected to have a short, medium, long, or life-long impact.</p> <p>For example: An individual speaks out against gender inequality in their community and is then targeted in a brutal attack which results in hospitalisation, long term physical and psychological impacts.</p>
<p>Likelihood: What is the likelihood of these negative consequences occurring?</p>	<p>Unlikely (1) Somewhat likely (2) Likely (3) Very likely (4)</p>
<p>Add together both above scores:</p> <p>NB: All the above consent processes still need to be in place, even if risk is deemed to be low.</p>	<p>If score is:</p> <ul style="list-style-type: none"> <input type="checkbox"/> 2 – Low Risk → Continue At this risk rating - Faces, full names and geographical location may be revealed. <input type="checkbox"/> 3 - 4 – Medium → Consider ways to minimise or mitigate risk including considering what can be revealed. At this risk rating - Faces, pseudonyms (limited cases first names will be permitted) and vague geographical location may be revealed. <input type="checkbox"/> 5 – 6 – High (with no significant boxes ticked) → Consider ways to minimise or mitigate risk including considering what can be revealed. At this risk rating - Faces and visuals to be concealed, pseudonyms to be used and locations will be changed. <input type="checkbox"/> 7-8 – Significant – Significant → ACCI will not publish any information or images when there is significant risk of harm and stigma. <i>The only exception is when an individual strongly expresses a desire for their story to be told and ACCI decides to respect the subject's right to tell their story as an act of advocacy. In these cases, the subject must give written consent and fully understand the risks and how the story will be used. Great caution should be exercised in these situations.</i>

SECTION 5: ADDITIONAL HIGH-RISK AREAS

Question:	Action
Does content include children who are identifiable?	<ul style="list-style-type: none"> <input type="checkbox"/> If yes, ensure: <ul style="list-style-type: none"> → The best interest of each child is protected over any other consideration → Children are adequately clothed and in poses that could not be seen as sexually suggestive → Childrens views have been taken into account (in accordance to their age and maturity). → If interviewing, interview has been conducted sensitively with children, only when a parent/guardian is present → Private information of children is not shared online and tracking function on equipment when capturing children is off → Special care has been taken during risk assessment
Does the content include survivors of exploitation or abuse?	<p>If yes, ensure:</p> <ul style="list-style-type: none"> → Special care has been taken during risk assessment → Person is not identifiable → Content has been obtained within 2 years (unless otherwise specified by individual/s involved) → Interviewers are properly trained to interview adult or child survivors of violence, exploitation or abuse
Does the content include survivors of disasters?	<p>If yes,</p> <ul style="list-style-type: none"> → Special care has been taken during risk assessment → Ensure, consent has been gained sensitively and consideration taken for those potentially being in a vulnerable state → Survivors of disaster understand that they do not have to share information or their story in order to benefit from disaster relief efforts → Special care has been taken during risk assessment <p>Best practice:</p> <ul style="list-style-type: none"> → Interviews have not been conducted in immediate aftermath of a disaster, unless an individual offers their story freely and with consent for the information/content to be shared

EXAMPLES:



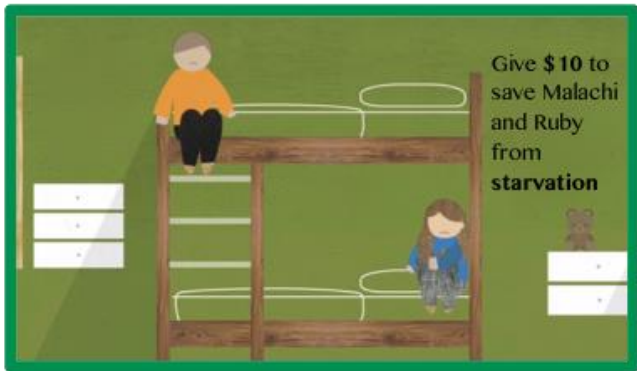
“Naomi has joined a working group run by our partners in Cambodia and has been able to grow a large veggie patch to provide for her family. We are thankful for all our donors who have supported Naomi on this journey through giving to ACCI”

Explanation:
This blurb does not show any substantial information and portrays the pictured family as empowered and with the capability to determine their own development

“Naomi and her family live in shocking conditions in the slum of Smor San in Phnom Penh, but with the help of ACCI donors she has been able to get out of extreme poverty and grow a veggie patch to care for her family. But her son Joseph is still in need of a sponsor so that he can go to school and be able to get a job in the future”

Explanation:
This blurb portrays the pictured family as very needy and with no agency. It calls on donors to be the saviours of the story. It also shares the community in which they live, which is not needed and put this family at risk

Explanation:
This poster is not context specific, does not show the complexity of issues and is portraying these children as extremely needy, where donor is put in a saviour position



Choice of photo shows children in context with their family looking empowered

Due to photo of family being in their private home, written consent would be needed, even if no identifiable information is shared

