COMMUNICATIONS POLICY

APPLICABILITY:	HAF Staff, Volunteers, Strategic Partners & Board Members
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INTRODUCTION

PREAMBLE

Good communication with our supporters is an essential component of the work of Hillsong Africa Foundation (HAF), our volunteers, beneficiaries, and partners. Without good communication, it is difficult to maintain the support of donors, as well as potential volunteers and beneficiaries, 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 HAF;
- act as tools that develop a healthy and balanced understanding of the issues we engage with;
- above all protect the interests of our key stakeholders.

STATEMENT OF COMMITMENT

HAF 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 HAF's values and beliefs, as outlined in HAF's Vision and Mission Statement.

GUIDING PRINCIPLES

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

- Protection of Private Information Act
- Consumer Protection Act
- Electronic Communications Act

SCOPE

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

- All HAF **Staff** including but not limited to employees, contractors and consultants.
- All HAF **Volunteers** including but not limited to office and event based volunteers.
- All HAF **Board Members**.

Note: For the purpose of this policy, "HAF Communications" includes all (including Disaster Relief) HAF marketing, fundraising and promotion materials and donor correspondences. It includes all images, film, stories, reports, online media, publications, website content and so forth.

1. ETHICAL GUIDELINES

1.1 PORTRAYAL OF LOCAL PEOPLE

HAF 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.

In all communications, HAF 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, HAF 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 exploitative.
- 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

HAF 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, HAF 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. 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, HAF will <u>avoid</u>:

- 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 HAF'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. HAF 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, HAF 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.

<u>Types of Consent</u>

- 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, HAF 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.
- HAF 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 HAF Media Release Form will be used for Adults, the HAF Media Release Form (Minor) will be used for Minors. 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 HAF media department.

Summary of Consent

Circumstance	No consent	Verbal consent	Written consent	Examples
Individuals are neither recognisable nor identifiable	☐			• 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		☐		• 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. **Where people/locations do not meet sensitive or high risk criteria.*
Individuals are identifiable			☐	• 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			☐	• 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 18 years old, consent must be gained from a parent or guardian through the HAF Media Release Form (Minor)

- Parents/guardians are not able to consent to children being photographed or participating in activities that are in breach of the HAF Child Protection Policy.

1.4 PORTRAYAL OF SENSITIVE ISSUES

Specific care should be taken when portraying sensitive issues or high risk populations such as 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, HAF 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, HAF 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 victimisation” 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, HAF 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 the 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, HAF 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, HAF 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, HAF commits to:

- ✔ Assessing the risks of harm or stigma to the subject. When publishing stories or images, HAF 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:	HAF will not publish any information or images when there is significant risk of harm and stigma. *The only exception is when an individual strongly expresses a desire for their story to be told and HAF 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.*

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

2. OTHER GUIDELINES

2.1 GENERAL GUIDELINES

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

2.2 DEVELOPMENT AND NON-DEVELOPMENT ACTIVITIES

- HAF will clearly and consistently distinguish development activities from non-development and evangelism activities in both communications and practice.
- Any combined communication materials of HAF and Hillsong Church 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

- HAF will appropriately reference and credit any overseas partners and implementing agencies involved in activities, projects and disaster relief appeals.
- HAF 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 on our behalf.
- HAF 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 HAF Annual Report will contain the following:

- A statement of HAF's mission and values;
- Summary of activities;
- Details of Board of Management

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

2.5 FINANCIAL INFORMATION

- Fundraising/promotions and administrative costs will also be made available upon request. HAF 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, HAF will disclose how the administrative and overhead expenses are being covered upon request.

2.6 LEGAL FUNDRAISING REQUIREMENTS

- HAF complies with all National and Provincial laws on fundraising and taxation rulings and regulations. HAF is legally required to operate within each country's parameters, and acquire the appropriate registrations or exemptions.
- HAF is a SARS registered PBO and adheres to all the relevant requirements thereof.

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.

Fundraising Contracts, Agreements & Third Party Services

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.
- HAF is to be acknowledged as the recipient of donations in all fundraising activities.

2.7 COPYRIGHT

- When publishing an image HAF will ensure we have permission from the photographer or copyright holder. If the image is not taken by someone on our HAF Staff/Volunteer Team, the name of the photographer and/or the source of the image may also be included.
- Whenever stock photography is used, HAF 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 Managing Director 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 HAF 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.

APPENDIX 1: COMMUNICATION TOOL

Communication Tool (Source: ACCIR)

Checklist for obtaining and publishing communications content

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

SECTION 1: GENERAL QUESTIONS

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

SECTION 2: TIMEFRAME

Question:	Action:
When has the content been obtained?	❑ Within last year → Continue ❑ 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 ❑ 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:
Is the person recognisable or 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).*	❑ Person is barely recognisable (e.g. Wide-angle shots, b-roll footage, creative angle shots that do not show defining features) → No consent needed. Continue checklist to determine if consent is required for other reasons ❑ Person is only recognisable including: o No full name/s o No identification of any individual o No location name or image with identifiable features *(e.g. Signs, landmarks)* o No accompanying detailed case study → ensure informed verbal consent has been gained from adult or child's guardian. ❑ Person is identifiable, including any above details: → ensure informed written consent has been gained from adult or child's guardian *(Note: This could be part of an enrolment process)*
Does the story or image contain any sensitive or stigma issues: o Images of people with HIV/AIDS. o Images of families in their private homes. o Images of children in classrooms. o Images of children next to a story discussing orphaned and vulnerable children. o Image of a Christian in a country where they may face religious persecution. o Images of survivors of exploitation, abuse and/or disasters.	❑ If yes, → ensure informed written consent has been gained

SECTION 4: RISK MANAGEMENT

Question:	Risk
Consequences: What are some potential negative consequences of posting this image or story? Consider the risk rating of	Low (1) Where the outcome would have a little to no impact, which would be expected to last only a short time, if any. 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.

these consequences. *Consequences can be of physical, emotional, psychological, social, financial, individual or organisational nature*	
	Medium (2) Where the outcome would have some impact, which would be expected to last a short or medium length of time. 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 they weren't properly consulted which led them to believe that all the organisation cares about is getting money. As a result, the individual's family left the program.

	High (3) Where the outcome would have a high impact, which could be short, medium or long term. For example: An individual shares a testimony that includes information on the community's habits on a 'taboo' topic and when the community hears 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.
	Significant (4) Where the outcome would have a significant impact, which would be expected to have a short, medium, long, or life-long impact. 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.
Likelihood: What is the likelihood of these negative consequences occurring?	Unlikely (1) Somewhat likely (2) Likely (3) Very likely (4)

Add together both above scores: *NB: All the above consent processes still need to be in place, even if risk is deemed to be low.*	If score is: ❑ 2 – Low Risk → Continue At this risk rating - Faces, full names and geographical location may be revealed. ❑ 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. ❑ 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. ❑ 7-8 – Significant – Significant → HAF will not publish any information or images when there is significant risk of harm and stigma. *The only exception is when an individual strongly expresses a desire for their story to be told and HAF 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.*

SECTION 5: ADDITIONAL HIGH-RISK AREAS

Question:	Action
Does content include children who are identifiable ?	❑ If yes, ensure: → 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 → Children's 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?	If yes, ensure: → 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?	If yes, → 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 Best practice: → 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