PALMERA

Ethical Communications Policy

APRIL 2021, VERSION 1

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Introduction

Palmera Projects (**Palmera**) uses Images Stories in its promotional materials and communications through a variety of platforms to describe Palmera, its objectives and projects. Often, Images and Stories feature the people who are the direct beneficiaries of Palmera's projects in the communities that Palmera works (**Local People**).

Palmera also uses a range of platforms to provide detailed information to its stakeholders, whether this be donors, members, supporters or members of the general public. This includes the use of Palmera's website (on which it publishes information about its projects, operations and financial performance), social media platforms, regular e-newsletters updating Palmera's stakeholders on its activities as well as public presentations to stakeholders, its peers or the wider community.

Definitions and Terms

Term	Definition
Images	Moving or still representation of an individual in either film or digital media.
Palmera Activity	Any proposed or actual programme or project to which Palmera contributes funds.
Palmera Partner	Any implementing partner organisation engaged by Palmera in the delivery of a Palmera Activity.
Palmera Staff	All employees, volunteers, contractors, consultants, officers and directors of Palmera.
Partner Staff	All employees, volunteers, contractors, consultants, officers and directors of a Palmera Partner.
Publication	Anything made public by print, computer modem or program, internet, poster, brochure or pamphlet.
Story	Any written material or message about Palmera, its members, Palmera Staff, Palmera Activities or other work or Palmera Partners.

Our Commitment

Palmera is committed to the capturing and Publication of Images and Stories of Local People from the communities in which we work, in strict compliance with the Australian Council for International Development's (**ACFID**) code of conduct and in a manner that respects the dignity, values, history, religion and culture of the people portrayed (**Commitment**).

Palmera is also committed to being transparent in our work and accountable to our stakeholders and the broader community. In doing so, Palmera strives to ensure that its stakeholders and the broader community are provided with relevant, timely and accurate information about the organisation that is ethically sourced and presented in an accessible format.

Purpose

The purpose of this Ethical Communications Policy is to ensure that:

1. information related to Palmera's operations, decision making, finances, structure, policies, procedures and governance is transparent, accessible and communicated to stakeholders and the broader community;

2. Palmera disseminates accurate, truthful, timely as well as accessible information to its stakeholders and members of the public and complies with key policies of Palmera (including Palmera's Safeguarding Policy (**Safeguarding Policy**)); and

3. the use of Images and Stories portraying women, men and children from the communities in which we work, by Palmera in its promotional materials and communications, respects the dignity of Local People in accordance with Palmera's Commitment.

In furtherance of this purpose, this Policy includes an Ethical Decision-Making Framework (**EDMF**) for communications which explains how to make ethical decisions when creating and disseminating Publications.

Status of Policy

This Policy consolidates and replaces previous versions of Palmera's Policy on the Portrayal of Local People and Communications Framework (each a **Prior Policy**). Any reference to a Prior Policy in any document, policy, guidance of Palmera or any agreement entered into by Palmera (including agreements with Palmera Partners) will be taken as a reference to this Policy. This Policy will be disseminated to all Palmera Staff and Partner Staff.

Scope

This Policy applies to all Palmera Staff and Partner Staff. While all staff, volunteers and members are responsible for ensuring Palmera's communications are timely, accurate and ethical, certain Palmera Staff members and Partner Staff will have greater responsibility in ensuring compliance with this Policy and the EDMF. In particular, these will be persons who source Images and Stories, gather content and/or are involved in Publications, namely, communications staff, multimedia producers and media relations persons, program staff and marketing and fundraising staff.

This Policy also applies to members of the public who undertake do-it-yourself fundraising on behalf of Palmera.

Requirements for the Portrayal of Local People

Requirements for Gaining Consent to Capture and Use Images and Stories

There are inherent complexities in gaining consent from people in the context of aid and development. It is important that Palmera and the Palmera Partners are conscious of the power differences that people in communities may experience, and acknowledge possible vulnerabilities. Palmera must provide enough information for any person from whom it is seeking consent in order that they are able to make a well-informed decision without experiencing duress or pressure. It can be helpful to provide people from whom Palmera is seeking consent with examples of how a story or photo may be used, using visual aids wherever possible.

When a local person is featured in an Image or Story, the person obtaining the Image or information for the Story (being any member of Palmera Staff or Partner Staff or other individual associated with Palmera obtaining Images or Stories) must ensure that:

- Key figures in the Images/Stories are informed of what the Image/Story is being used for and how it may be used, and their permission is sought to obtain and use their Image/Story prior to its use in any Publication. Permission should be obtained in a way that is culturally appropriate and contextually sensitive.[1] In the event the person refuses permission, their Image/Story may not be obtained or used in Publications.

- Where the key figures in the Images/Stories are a child or children under the age of 18 years, the Safeguarding Policy must be complied with and the parent, guardian or other adult care giver of a child or children under the age of 18 years must give their consent prior to capturing and using the child(ren)'s Image and/or Story and that details have been explained as to how and where the Image/Story will be used. Where possible this information should be given in writing.

- The key figures in the Images/Stories understand that their Image/Story may be published for the purposes of the promotion of Palmera and its mission.

- The key figures in the Images understand that the Published Images/Stories may be seen by people all over the world and for many years after the initial Publication of the Images/Stories.

- The key figures in the Images/Stories understand that they can request Palmera to use a pseudonym when identifying them in any Publication.

- If the person obtaining the Image or information for the Story is a member of Partner Staff, the Palmera Partner has given verbal permission (whether verbally or in writing) for the Images/Stories to be sent to Palmera and to be used in Palmera promotional material and communications.

- Palmera Partners who provide photos within monitoring reports will specifically state where Images/Stories have not received permission for public use.

- The collection of Images and Stories should not harm key figures or any other person within the community and nor should it harm the environment.

Requirements for Publishing Images and Stories in Promotional Materials and Communications

Palmera has the right to edit any Stories submitted by Palmera Staff and Partner Staff and other individuals associated with Palmera who may capture Images or write Stories for Palmera, to ensure it complies with the requirements of this Policy.

All such material submitted to Palmera must be approved by a Project Manager (or a relevant member of Palmera Staff) prior to Publication to ensure strict compliance with the following obligations:

- Images and Stories of women and men, boys and girls will present them in a dignified, respectful manner, portraying them as equal partners in the development process.

- Images and Stories of children will portray them in a dignified and respectful manner and in accordance with the Palmera's Safeguarding Policy.

- Images and Stories will honestly portray the diversity of local people including age, disability and other marginalised groups.

- Images and Stories will honestly convey the context and complexity of the situations in which local people live and will not sensationalise the challenges faced in the recipient communities in which we work.

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[1] In the context in which Palmera works, where communities may be very poor and people illiterate, it is not necessary for Palmera to gain written consent. Rather, the onus is on Palmera and Palmera Partners to seek informed consent in the most culturally sensitive and appropriate way.

- Images and Stories of children should not include any identifying information of the child, including the child's family name, community or school name.

- Images and Stories of children should not portray children in isolation; instead, they should be portrayed as part of their community.

- Images and Stories will utilise pseudonyms to identify key figures in the Image/Story, where the person has requested Palmera to do so.

- Origins of any Images used will be known and any necessary permissions, including copyright releases, be held.

- Care will be taken to ensure that the use and Publication of Images or Stories of local people will not endanger the people they portray and if there are any such risks to local people portrayed, then those Images or Stories will not be published.

Where Palmera works with other NGO's or a broader international network, promotional materials should clearly distinguish between Palmera's work and the work of other NGO's or the network.

Ethical Decision-Making Framework

As noted above, Palmera is committed to the capturing and publication of Images and Stories of local people from the communities in which we work, in a manner that respects the dignity, values, history, religion and culture of the people portrayed.

Images and Stories about the people Palmera works with play a vital role in helping Palmera raising awareness about poverty and economic exclusion, bringing to life Palmera's work to life and engaging supporters and the public

All promotional material and communications must accurately reflect Palmera's programmes, activities and mission. Text and Images should directly relate to the country, place, context and activities supported by Palmera.

In alignment with Palmera's development philosophy of creating sustainable livelihoods and social ventures in local communities in which we work by empowering social entrepreneurs in those communities, all Palmera promotional materials and communications will promote Palmera Partners and beneficiaries as active agents and not as passive recipients of aid.

Palmera's EDMF for communications explains how to make ethical decisions when creating and publishing Publications. It uses a framework of structured discussions at ethically important moments during the storytelling process to reduce the risks associated with storytelling and protect contributors. This EDMF sets out important questions and explains when these questions ought to be asked when capturing and publishing Images and Stories. It also explains who is responsible for having these discussions and what to do if a decision can't be made.

Ethically Important Moments

While all ethical issues should be considered throughout the storytelling process, there are times when certain issues are more important. Appendix A contains seven key 'ethically important' moments during the storytelling and publishing process, accompanied by key issues to discuss at those times.

Ethical Framework

Palmera's EDMF is set out in Appendix B, which presents five key ethical issues that are relevant for the capture and publication of its Images and Stories. These ethical issues should be discussed at the ethically important moments outlined above.

Availability of Information

Information that will be shared

Palmera will share all relevant information with its stakeholders, including Palmera Partners and the broader community, unless there are good reasons why information cannot be disclosed. Palmera will proactively publish information covering the following areas:

1. **Financial information**: Palmera will ensure that summary and complete financial reports are made available to all stakeholders. It publishes summary financial statements in its Annual Report in accordance with guidelines set by the Australian Charities and Not-for-profit Commission (**ACNC**) and the Australian Council for International Development (**ACFID**), which will be posted on Palmera's website. Full financial reports will be available on request.

2. **Governance Structure**: Palmera shares information regarding our governance structure, legal status and organisational purpose.

3. **Work**: Palmera disseminates information regarding its work and programs, including results and lessons to all stakeholders, including primary stakeholders, Palmera Partners and donors. This may be through regular e-newsletters, as well as information published on Palmera's website.

4. **Partnerships**: Palmera shares information on formal partnerships with Palmera Partners.

5. **Policies**: Palmera shares its organisational policies and procedures relevant to external stakeholders on Palmera's website.

Information that will not be shared

Palmera will not disclose information for the following reasons:

- **Privacy**: personal details and other information private to individuals will not be disclosed in accordance with Palmera's Privacy Policy;

- **Confidential**: information that is subject to a legal, commercial or contractual obligation ogf confidence will not be disclosed;

- **Intellectual Property**: in some instances, Palmera may not be able to share information as it will infringe on intellectual property rights or a third party;

- **Security**: Palmera will not disclose information where we consider the disclosure could jeopardize our ability to operate or compromise the safety of our staff and that of our partners;

- **Harm to operations**: Palmera will not disclose information that could damage or inhibit our operations or our work; and

- **Other**: Palmera will not disclose information that solely relates to internal administration or operating systems that are not relevant for external stakeholders.

Requesting further information

A request for information can be made by any of the following methods:

Term	Definition
Letter	Requests for information by letter should be addressed to:
	57 Chalmers Road

	Strathfield NSW 2261
	Australia
Email	Requests by email should be addressed to:
	abarna.r@palmera.org OR hello@palmera.org
Telephone	Requests by phone can be made by calling: +61 410 523 342
Website	Requests can also be made through Palmera's website: https://palmera.org/contact-us

Upon receipt of any request for information, Palmera will:

1. Acknowledge the requester's request for information

2. Confirm whether the information requested can be disclosed to the requester

3. Collate the information and send to the requester (or inform the requester the reasons why the information cannot be disclosed)

Guidelines for The Distribution of Information

Before the release or distribution of any public information to stakeholders or on any of Palmera's public platforms (including its website or social media platforms) or any public presentation, the persons or people responsible for the despatch of that information must ensure that:

Accuracy and quality of information

1. The statements made in the information (in particular statements in relation to specific projects, activities, funds raised or expended) are verifiable with respect to a primary source document (except for statements which are a matter of fact). For example, information in relation to outcomes of a project or programme should be verified against any project / programme reports submitted by the Palmera Partner.

2. All other statements of intention, opinion, belief or aspiration by Palmera are made on a reasonable basis and have been reviewed by the CEO.

3. Prior to the publication or distribution of any information to stakeholders and/or the public, the form and content of the information has been reviewed by the CEO or a person with delegated authority from the CEO.

4. Any statements made by another person or made on behalf of that other person appearing in the information is being disclosed in the information with the consent of that person.

Timeliness of information

1. Any updates to be provided to stakeholders are provided in a timely manner and contains the most up to date information available to Palmera at the time of publication and/or distribution of that information.

2. Any major developments with respect to Palmera's projects, its activities or operations which are material from the point of view of a donor, member and/or supporter must be communicated to those persons in a prompt manner.

Accessible

1. Information which is directed at donors, members or supporters is sent directly to them either electronically (via an email address provided) or physically (using a residential address provided).

2. Information which is for the general public is uploaded on to one or more of Palmera's online platforms, including its website or social media platform.

Ethical communications

1. In addition to the Requirements for the Portrayal of Local People set out above, Palmera must also seek to uphold the privacy of its contributors and other stakeholders in preparing and distributing public communications. Any such public communications must be in compliance with Palmera's privacy policies.

2. Palmera's public communications and communications with stakeholders must also abide the ACFID's commitment to principles of fairness and cooperation. Accordingly, Palmera must not seek to make statements about other ACFID members with the intention of creating a reputational or other advantage to themselves.

Reviewing This Policy

Date	Version	Review Description	Reviewed By	Approved By
April 2021	1	Original	N/A	Board of Directors

Appendix A

Ethical moments

Moment	Issues to Consider
When scoping a story	Connection to Palmera's values and mission Protection of key figures Respectful and accurate portrayal
When planning to gather content	Informed consent Protection and privacy of key figures Respectful and accurate portrayal
While gathering content	Informed consent Connection to Palmera's values and mission Protection and privacy of key figures Authorship and ownership Respectful and accurate portrayal
Directly after gathering content	Informed consent Protection of key figures
While creating the content	Connection to Palmera's values and mission Protection of key figures Respectful and accurate portrayal Authorship and ownership
At Publication	Connection to Palmera's values and mission Protection and privacy of key figures Respectful and accurate portrayal Informed consent Authorship and ownership
After Publication	Informed consent Authorship and ownership

Appendix B

Ethical framework

Ethical Issues	Questions to consider
Connection to values	*Palmera's values* • Does the Image or Story uphold our value of integrity and honesty? • Does the Image or Story respect those with who we work? • Are we being transparent about our contribution? *Human rights* • Have we put the best interests of the key figure(s) first • Have we ensured we 'do no harm' to the key figure(s) during the storytelling process? • Have we treated the key figure(s) with dignity and fairness? • Have we respected the personal freedom and privacy of the key figure(s)? • Have we encouraged the key figure(s) to freely express their thoughts and feelings? • Have we given the key figure(s) control over how their identity and thoughts are portrayed in their story? • Have we ensured the content is accurate? *Children's rights* • Have we ensured the best interest of children have been put before the interests of adults and our organisation? • Have we adequately protected children? • Have we respected children's rights to dignity and fairness? • Have we attempted to reduce stereotyping of children? • Have we treated all children equally? *Women's rights* • Have we carefully considered how women are portrayed? • Have we considered how sex-role stereotyping is portrayed? • Have we given voice to women? • Are we empowering girls and women through this story? • Have we considered the unique protection needs of women in this story? *Disability rights*

Ethical Issues	Questions to consider
	• Have we given people with disabilities the opportunity to contribute to this story?
	• Have we considered how ableism has affected this story?
	• Have we carefully considered how people with a disability are portrayed?
	• When published, will this story be accessible to people with disabilities?
Protection	Palmera is committed to putting the wellbeing of its villagers and communities first. This is evident through its Safeguarding Policy, Gender Equality and Social Inclusion Policy and this Policy. In furtherance of this commitment, Palmera should also consider in the Publication of any Image or Story:
	Protection of life
	• Could the key figure(s)'s life be put at risk by sharing their story?
	• Do we know enough about the key figure(s)'s history to make a confident assessment of their safety?
	Protection of health
	• Could the key figure(s)'s health be put at risk by sharing their story?
	• Could the key figure(s)'s risk being cut off from important services by sharing their story?
	Protection of dignity
	• Could we be putting the key figure(s) or their community at risk of vilification or retribution by sharing their story?
	• Have we considered how the key figure(s)'s family, friends and community might feel about the storytelling project?
Informed consent	As noted in this Policy, key figures must provide their informed consent to be captured in any Image or Story. Permission should be obtained in a way that is culturally appropriate and contextually sensitive. The following are considerations that arise when obtaining such consent / permission:
	Correct information
	• Have we provided all the necessary information to the key figure(s) so they can decide whether to consent to participate?
	• Have we shown the key figure(s) appropriate examples of how their story might be used (including where it may be published and who will see it)?
	• Have we explained different ways the key figure(s)'s identity can be revealed and concealed?
	• Have we consulted with the right people (including children's guardians and community elders)?
	Clear comprehension

Ethical Issues	Questions to consider
	• Does the key figure(s) fully understand the risks and opportunities associated with sharing and publishing their Image and Story?
	• Have we given the key figure(s) enough advance notice about the project so they have time to consider the risks and opportunities?
	• Have we explained the storytelling process in a way the key figure(s) fully understands (including children), using the best-possible language?
	• Is there a single point of contact for the key figure(s) to discuss the project and any consent issues? Is it easy for the key figure(s) to discuss the project with us?
	Voluntary consent
	• Is there a power imbalance between the key figure(s) and the organisation?
	• If there is a power imbalance, can you describe it?
	• If there is a power imbalance, how can we reduce it?
	• Is there an element of duress in the key figure(s)'s consent?
	• If there is an element of duress, how can we address it?
	• How can we ensure the key figure(s) can say 'no' to being involved in the storytelling project?
	• How can we ensure the key figure(s) can withdraw their consent at any time?
Privacy	Palmera values and upholds the privacy of its key figure(s). All staff, directors, partners and volunteers must abide by our privacy policies contained in our Organisational Policy. There are also context-related issues that arise in relation to privacy in the capture of Images and Stories:
	Protection
	• Have we adequately protected the privacy of the key figure(s)?
	• Have we discussed how the key figure(s)'s story may expose them to the public?
	• If appropriate, have we adequately concealed the name, location and visual identity of the key figure(s)?
	Information storage
	• Have we safely and securely stored the key figure(s)'s personal information?
	• Does the key figure(s) understand how their personal information is stored and used?
	Access to information
	• Who has access to the key figure(s)'s information and are they aware of who can access it?

Ethical Issues	Questions to consider
	• Have we explained how the key figure(s) can access their personal information, make amendments to their story and withdraw consent?
Authorship and ownership	Palmera respects the right of key figures to control their Stories. We also respect the right of contracted writers and photographers to moral ownership of their works. While Palmera will abide by its privacy policies in its Organisational Policy, the following considerations should be had during the capture and Publication of Images and Stories:

Authorship

- How will contributors and content creators be acknowledged when publishing their stories?
- Does acknowledgement of authorship have implications for the privacy, anonymity or confidentiality assurances given to contributors?
- What ethical obligations do contributors and content creators have to the truthful representation of stories and data?

Copyright

- Who owns the copyright of our storytelling content?
- Are there any conflicting copyright claims for storytelling materials we've published (or seek to publish)?
- How do we ensure contributors and content creators understand their legal rights?