POLICY G020: MEDIA AND COMMUNICATION POLICY

Responsible person:	CEO	Version:	1.2
Approved by Board of Directors on:	27 February 2019	Scheduled review date:	February 2028

PREAMBLE

This policy was written by So They Can (Australian Entity) in Australia for use across all So They Can offices. So They Can operates six offices registered in each of Australia, Kenya, Tanzania, New Zealand, England & Wales and the USA, which are part of the So They Can Global Alliance. In this policy, 'CEO' means CEO of So They Can (Australian Entity). Unless specified otherwise the 'Board' refers to the board of So They Can (Australian Entity). This policy is intended for all So They Can staff, Board members and volunteers, in all 6 So They Can offices. So They Can procedures are consistent with So They Can policies.

POLICY

So They Can produces and distributes a range of media and communications material including but not limited to media stories, newsletters, flyers, appeals, photography, annual reports, website and social media (such as Instagram, LinkedIn and Facebook).

The key goals of our media and communications materials are to:

- contribute to raising awareness in Australia and globally of the challenges faced by our program/project participants and their communities;
- demonstrate transparency and accountability to our program/project participants, partners including government partners, donors, members, staff and volunteers and other interested parties;
- generate awareness of our programs, including sharing of results, impacts and evaluation reports and sources of funding;
- generate partnerships and networks with like-minded organisations;
- directly raise funds and promote fundraising events and appeals;
- showcase and publish our program work, including sharing of results, impacts and evaluation reports and
- strengthen profile and visibility of our organisation in order to achieve all of the above.

So They Can is committed to ensuring that all our media and communications materials are consistent with our purpose and values and that they acknowledge and attribute the Australian identity and that they provide a truthful, accurate and comprehensive picture of our organisation and programs. So They Can will ensure that all key communication materials include the Australian Aid identifier in conjunction with text that acknowledges the Australian Government and the Australian NGO Cooperation Program (ANCP). So They Can has procedures in place to ensure that images, messages and stories used in the public materials are obtained and used according to ethical principles, ACFID's Fundraising Charter and relevant So They Can policies and guidelines:

- Child Protection Policy
- Privacy Policy
- Fundraising Manual
- Non-development Activity Policy

- Guidelines on Ethical Photography (Annexure B) developed by So They Can to ensure that we use all images, videos and printed messages in communications in a way that portrays people in a manner that respects their rights, safety, dignity, values, history, religion, language and culture.

So They Can has developed an External Communications Compliance Checklist (Annexure C) to be used as a tool to ensure external communications comply with the requirements outlined in this policy.

PRINCIPLES

Positivity and dignity

So They Can has developed a set of Guidelines on Ethical Photography (Annexure B) to ensure that we use all images, videos and printed messages in communications in a way that portrays people in a dignified way that respects their rights, safety, values, history, religion, language, confidence and culture. We use positive depictions of people and their activities acknowledging their active role in aid and development.

Concealment of identity

So They Can will not use full names of photographed or interviewed people and will not disclose their exact location. So They Can will ensure that file labels, meta data or text descriptions do not reveal identifying information when sending images electronically or publishing images in any form. At all times So They Can will only use first name and broad location in all public materials and communications. So They Can will not identify survivors of sexual exploitation, gender-based violence or abuse as such. An individual's status as a person living with HIV, TB or any other serious health conditions will not be revealed without written consent.

Informed consent

We always seek people's informed consent before photographing or filming, or recording of personal or private information. For this purpose So They Can has developed a 'Consent to use images, and personal information' (Annexure A) that must be explained, agreed to and signed by the person whose photographs is to be taken or whose information is to be recorded or, in case of a child being the object, by his/her legal guardian. Translation into locally spoken language is available for people who do not speak or read English. The person giving consent must be informed about a procedure to withdraw their consent and contact information to do so.

Written consent is best practice, however when this is not possible verbal consent is acceptable. Verbal consent requires written documentation of the verbal consent by the photographer to be filed with the image. Only a parent or legal guardian can give verbal consent for a child.

Consent is always required from individuals and small groups, only a parent or legal guardian can consent for a child.

Where photographs are to be taken of a large group activity or public event then this will be announced in advance so that individuals may leave briefly if they do not wish to appear in the photographs. Consent is not required If individuals are not readily identifiable (face and identifying features) from the photograph and it seems unlikely that any damage or distress will result from such processing.

Consent is not required from public figures in public spaces and from large crowds in public spaces.

PROCEDURES

So They Can incorporates in its child protection training for staff and volunteers the risks to children using the internet and social media platforms, with a focus on gender, local and cultural contexts.

So They Can's Communications Manager is responsible for ensuring public materials and communications are accurate, truthful, up to date and meet all other requirements of this policy. He or she works closely with So They Can's Monitoring, Evaluation and Learning officers and program managers.

The Communications Manager is responsible for publishing these materials on So They Can's website, and/ or social media, in a timely manner or directly distributing them to targeted audience. The Communications Manager must periodically review So They Can's website and social media pages to ensure that the displayed information about the organisation and our programs is up to date and complies with So They Can's policies, branding and integrity, including acknowledging and attributing the Australian identity.

Communication about serious matters that may include change of strategic approach, staff changes at senior management level, emergency situations and measures or major milestones and the Annual Report, are subject to the approval of So They Can CEO.

The preparation and audit of So They Can's Annual Financial Report is the responsibility of So They Can's CFO and CEO. The CEO must approve the document before it is referred to So They Can's Australian Board of Directors for formal approval.

All public materials and communications must follow So They Can's Brand Guidelines developed to achieve consistency of messages and visuals across all communication channels. These guidelines provide directions on language, tone of voice, photography styles, colour scheme, design, key phrases etc.

RELATED DOCUMENTS

So They Can Child Protection Policy

So They Can Privacy Policy

So They Can Fundraising Manual

So They Can Guidelines on Ethical Photography and Collection of Personal Information

ACFID's Fundraising Charter

So They Can Brand Guidelines

Date	Version	Comment
February 2019	1.0	New global So They Can Policy
June 2021	1.1	Addition of commitment to acknowledgement of Aust. Government and ANCP and Comms. Checklist Policy review

February 2024	1.2	Review of preamble – change International to “Australian Entity”
November 2025	1.2	Addition of England & Wales entity into preamble
February 2026	1.2	Standard policy review, no changes February 2026

ANNEXURE A

CONSENT TO USE IMAGES AND PERSONAL INFORMATION

So They Can[1] in accordance with its Child Protection Policy, Privacy Statement and Ethical Photography Guidelines (all available at www.sotheycan.org) takes photographs and videos and records personal information and stories of its projects and participants. Images and stories are used in publications to continue to raise funds to support So They Can projects, and for publicity and promotional purposes.

OFFICE USE ONLY

Shoot date __ __ /__ __/ __ __ __ __

Shoot location

_____
_____
_____

Photo description

_____
_____
_____
_____
_____
_____

Photo number_____
_____

DECLARATION

I give permission for:

- images;
- videos; and/or
- stories and personal information

of me, and/or my child/ward as listed below, to be used by So They for publications and public relations activities. I understand the first name of me or my child/ward may be published with the image or story.

In particular I note this may include use in print and electronic media, including the internet and social media platforms.

I understand that So They Can will not be accountable should overseas recipients of the images breach Australian privacy laws and that I will not be able to seek redress under the Privacy Act. I have read and understand this notice, and consent to the collection, use and disclosure of my image, including disclosure to overseas recipients, as outlined.

Consent can be withdrawn at any time by notifying your local So They Can office, or via info@sotheycan.org.

Name:…… Signed: ……

Dated:……

Name: …… Class…… School……..

Name: …… Class…… School……..

Name: …… Class…… School……..

Name: …… Class…… School……..

[1] In this document So They Can refers any or all of the international So They Can entities registered in Australia, New Zealand, Kenya, Tanzania and USA

ADDITIONAL INFORMAT

ANNEXURE B

GUIDELINES ON ETHICAL PHOTOGRAPHY

Photographs and videos taken by So They Can staff or a photographer appointed by So They can should respect human dignity and ensure the rights, safety and well-being of the person or people being portrayed. This means:

- complying with local traditions or restrictions in taking or reproducing images of people, objects or places
- understanding national laws related to photography, filming and privacy rights
- gaining appropriate verbal or written informed consent before taking photographs or videos
- respecting a person's right to refuse to be photographed or video. If you sense any reluctance or confusion, refrain from taking the photo or video
- not causing harm. Individuals or groups may be put at risk of reprisal, violence or rejection in their communities as a result of exposing their identity or personal story through the publication of their photograph or broadcast of any video
- not misrepresenting the individual, situation, context and location of the photograph or video
- absolutely no payments or any other form of compensation being provided to subjects in exchange for their photograph or video to be taken or for their consent or signed release for publication or broadcast

Photographs and videos of issues that are culturally sensitive, politically sensitive or socially stigmatised must protect the identity and privacy of individuals.

- Do not identify individuals. Position the camera in such a way that faces and other unique characteristics cannot be discerned.
- Obtain informed written consent to use real names and locations in situations where disclosure could result in harm. Otherwise, remove detailed personal information such as names and locations in captions or any other associated documentation.
- Identifiable images of individuals should not be used to illustrate sensitive subject matter in such a way as to indicate that the individual is connected with the issue.

Photographs or videos of people with special needs are to be taken with particular care, compassion and protection of privacy.

- Photograph or videos all people with respect and dignity. Special care and compassion must be exercised with vulnerable subjects.
- Survivors of sexual exploitation, gender-based violence or abuse are not be identified as such.
- An individual's status as a person living with HIV, TB or any other serious health conditions must not be revealed without informed written consent.
- An individual's engagement in sex work or other socially marginalised or criminalised (or criminal) activities must not be identified.
- Care must be taken in photographing or filming people in times of crisis. Do not exploit an individual's vulnerability at times of trauma or grief.

Photographs or videos of children taken for work related purposes must adhere to standards arising from So They Can's Child Protection Policy. Before photographing or filming a child, staff or contractors must obtain informed consent from the child and a parent or guardian and explain how the image or video will be used. In group situations such as a classroom, confirmation of previous parental consent is to be obtained from a school principal or senior teacher. In addition:

- before photographing or filming a child, assess and comply with local laws, traditions or restrictions for reproducing personal images
- ensure photographs, videos and DVDs present children 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
- images must be honest representations of the context and the facts
- file labels must not reveal identifying information about a child when sending images or videos electronically.

ANNEXURE C

EXTERNAL COMMUNICATION COMPLIANCE CHECKLIST

Communication title:	
Date published:	Responsible person:
Compliance criteria	**Criteria check**
Alignment with So They Can's vision and mission	☒
Gender, disability, child protection sensitive language	☐
Consistency with other So They Can communications (website, social media, Annual Report)	☒
Consistency with up to date MEL data	☐
Alignment with So They Can's brand guidelines (tone of voice, personality)	☐
Contains So They Can's key messaging	☐
NON-DEVELOPMENT ACTIVITY POLICY	
All communications and promotional materials clearly separate between aid and development and non-development activities – all non-development activities must have a comment "According to the DFAT definition this project is considered a non-development activity" *Currently we have no projects classified as Non-development*	☐
Fundraising solicitations which include references to both aid and development and non-development activities provide the choice of contributing to aid and development activity only	☐
SOCIAL MEDIA AND COMMUNICATIONS POLICY/ ETHICAL PHOTOGRAPHY GUIDELINES:	
If you are not 100% sure whether or not an image/story/personal information meets the following criteria it is essential for you to seek opinion of at least one another senior So They Can staff such as the CEO, COO or Country Director	
Informed consent for images, videos and recordings of personal stories (for children from a parent or a guardian)	☐
Is this a serious communication (relating to change	

of strategic approach, staff changes at senior management level, emergency situations and measures or major milestones and the Annual Report)? If yes has it been approved by CEO?	No ☐Yes ☐ ☐
Positivity and dignity All images, videos and printed messages portray people in a dignified and positive way that respects their rights, safety, values, history, religion, language, confidence and culture.	☐
Concealment of identity This communication does not use full names of photographed people and does not disclose their actual location.	☐
File labels, meta data or text descriptions do not reveal identifying information when sending images electronically or publishing images in any form.	☐
Photographs, videos and recordings present children 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	☒
ACKNOWLEDGEMENT OF AUSTRALIAN GOVERNMENT SUPPORT	
Acknowledgement of Australian identity and contribution of contribution by Australian Government (in Australia and in-country)- combination of logo and written/verbal text as per following examples: • [NGO] is accredited by the Australian Department of Foreign Affairs and Trade (DFAT), responsible for managing the Australian Government's development program. [NGO] receives support through the Australian NGO Cooperation Program (ANCP). • [NGO] is accredited by the Australian Department of Foreign Affairs and Trade (DFAT), responsible for managing Australia's development program. To maintain accreditation, [NGO's] systems, policies and processes are rigorously reviewed by the Australian Government. [NGO] receives support through the Australian NGO	☐

Cooperation Program (ANCP). • In [Financial Year], [NGO] was supported by the Australian Government through the Australian NGO Cooperation Program (ANCP). • [NGO /Project] is supported by the Australian Government through the Australian NGO Cooperation Program (ANCP). • [NGO /Project] receives support from the Australian Government through the Australian NGO Cooperation Program (ANCP). • [NGO] acknowledges the support of the Australian Government through the Australian NGO Cooperation Program (ANCP). • With support from the Australian Government through the Australian NGO Cooperation Program (ANCP), [Project/NGO]. If the reference is online, the words Australian NGO Cooperation Program should link to the ANCP webpage on the DFAT website.	