



## **1 Purpose**

The Leprosy Mission Australia (TLMA) is accountable to God and to our partners, members and supporters for how we use our resources and how we present to the public. TLMA is committed to communicating awareness about communities, the type of work we do, and the impact of our work and to do this clearly, ethically, honestly and sensitively with due respect to the dignity, values, history, religion and culture of the people with whom it works. This policy seeks to fulfil this commitment and to be accountable and transparent in doing so.

## **2 Scope**

This policy applies to all staff and Board members of TLMA, and to temporary workers, volunteers, consultants, contractors, agents, and implementing partners. This Policy applies to TLMA's workplaces and projects globally.

This policy covers all communications, activities and materials produced or shared by TLMA representatives.

## **3 Responsibilities and Accountabilities**

### **3.1 The Board**

The TLMA Board are responsible for:

- creating a culture and providing governance guidance for TLMA in relation to public engagement;
- holding relevant Executive Directors accountable to this Policy.

### **3.2 Senior Management**

Senior management are responsible for:

- ensuring this Policy is upheld, regularly updated and will inform the Board of any concerns that may present risk to TLM, its personnel, beneficiaries, partners, reputation, operations or other activities;
- ensuring that appropriate risk assessment and mitigation controls are put in place and regularly reviewed;
- ensuring procedures, practices, plans and operations align with this Policy;
- ensuring that all entities and relevant personnel are trained in order to be aware of, and understand, this Policy and their responsibilities under it.

## **4 Transparency**

TLMA is committed to being transparent in our work and accountable to our stakeholders and community. TLMA strives to ensure that information related to its operations, decision making, finances, structure, policies, procedures and governance is timely, relevant and accurate and communicated in an accessible form to relevant stakeholders.

### **4.1 Open information**

TLMA is committed to principles of transparency in all of its operations. In practice this means that TLMA will actively share information about its work through its main communication channels. TLMA publishes key organizational data on our website:

- Constitution and Board composition;

- Vision, Mission and Values
- Annual Reports and audited financial statements for the last 10 years that meet the requirements of ACNC, DFAT, ACFID and all applicable accounting standards
- Key governance policies; and
- Program information, including summaries of evaluations are contained in Annual Reports

#### **4.1.1 How to request information**

Requests for information can be made to TLMA by phone, email, in-person, or via mail.

All requests for information will be dealt with as quickly as possible. Where TLMA is unable to make requested information available, we will provide the enquirer with an explanation of the reasons.

Any appeals related to denied information requests can be made using TLMA's complaints mechanism (See Complaints Policy on the website) or directly to the Chief Executive Officer.

#### **4.1.2 Information not able to be shared**

TLMA will not share information that breaches or compromises:

- TLMA's privacy policy;
- the safety and security of project participants, TLMA staff or TLMA partners or their associates;
- TLMA's communications and marketing strategy.
- TLMA will not provide information which it does not have and cannot obtain without incurring costs.

### **4.2 Communications**

TLMA is committed to keeping our supporters informed and proactively publishes information about our work. TLMA is committed to educating, informing and raising awareness among our supporters and the general public of the needs of people affected by leprosy and raising funds to meet those needs. Updates about TLMA programs are communicated to supporters via newsletters, magazines, social media, letters and phone calls as well as on the website. TLMA is committed to respecting peoples' privacy and non-harassment in the pursuit of explanations or comments from potential supporters.

All communications activities will operate within the ethics and standards set out in TLMA policies and guidelines, the Australian Council for International Development (ACFID) Code of Conduct and Fundraising Charter, the Fundraising Institute of Australia (FIA) Code, Department of Foreign Affairs and Trade (DFAT) Guidelines for the Australian NGO Co-operation Program (ANCP). TLMA will also abide by the communications commitments set out in agreements or contracts with institutional funders.

In our communications, publications and presentations, our portrayal of local people and supporters respects the dignity, values, history, religion and culture of the people portrayed according to the standards listed above. Appendix 1 sets out our criteria and practice for our communications.

TLMA uses training materials and risk review assessments to ensure adherence to ethical guidelines, particularly in regard to the collection of images and stories.

## 5 Reference Documents

- Section 4.2 – ACFID Code of Conduct <https://acfid.asn.au/code-of-conduct>; Fundraising Institute of Australia <https://fia.org.au/fiacode/>; Section 8 of the ANCP Manual <https://dfat.gov.au/about-us/publications/Documents/ancp-manual.pdf>
- Section 4.2 – Communications Risk Assessment Checklist for communicating about participants
- Section 4.2 – Informed Consent slides for TLM GFRC, Informed Consent slide notes for TLM GFRC, Informed Consent – TLMI Informed Consent Forms and Guidance 2022 – guidance for staff.
- TLMI Safeguarding procedures
- Return to Senders (RTS) procedures guide
- Ethical Decision-making framework

## 6 Policy Review

This Policy will be reviewed in 5 years.

### Revision History

Version	Date	Author	Summary
5.0	10 December 2019	N Collard	New draft created for next revision
5.1	27 November 2023	A Newmarch	Policy updated to align with ACFID Code Self-Assessment requirements

### Document Approval History

Version	Date	Approved by
1.0	21 May 2012	TLMA Board
2.0	2 May 2016	TLMA Board
3.2	2 September 2017	TLMA Board
4.3	2 December 2019	TLMA Board
5.1	4 December 2023	TLMA Board

## Appendix 1

### Standards in Public Engagement, Communication and Fundraising

Our mission, “.... breaking the chains of leprosy, empowering people to attain healing, dignity, and life in all its fullness”, involves educating, informing and raising awareness among our supporters and the general public of the needs of people affected by leprosy and raising funds to meet those needs.

In our communications, education and fundraising activities we uphold standards of integrity and transparency. We demonstrate integrity in marketing and reporting.

**1. In our communication and appeals we will:**

- a. Accurately identify the organisation (name, ABN, address and purpose)
- b. Clearly state why the donations are being collected and what they will be used for
- c. Allow donors the ability to control the volume of communications which they receive
- d. Accurately portray the situation of intended recipients and the potential solutions
- e. Not overstate either the extent of the need or what a donor's response might achieve
- f. Not use guilt to leave potential donors feeling that their failure to respond to the solicitation will have greater consequences than the reality of the situation.

**2. In our communications, publications and presentations, our portrayal of local people and supporters will respect the dignity, values, history, religion and culture of the people portrayed.**

With regard to use of images and stories we will ensure:

- a. Before a contributor's image is used in any communication to supporters or donors, that there has been no pressure to contribute, that consent is sought before the contribution and that there has been a process of explanation to ensure informed consent. Where the subject is a child, consent will be sought from the parent/guardian.
- b. The TLM informed consent form will be in local language or translation provided at the time of acquisition and consent
- c. Contributors are told how their images and stories will be used
- d. Contributors will be given the opportunity to express preferences on how they are portrayed and how the story will be presented
- e. There will be opportunity to forego taking of an image or story without fear of reprisal and also the opportunity to withdraw the image or story
- f. Images and stories of contributors will be shared with them before publication where possible
- g. Images of subjects should present them in a dignified manner
- h. Images should be decent and respectful and not present contributors as victims
- i. Images should not depict contributors in a vulnerable or submissive manner
- j. People (especially children) should be adequately clothed in photographs and not in poses that could be interpreted as sexually suggestive
- k. The images and stories we use honestly portray the diversity of local people including age, disability, gender and religion
- l. The images and stories we use portrays the affected people (including children) in a

manner which respects their values, history, language and culture

- m. The use of paternalistic images, suggesting a “dependent/provider” relationship, should be avoided
- n. All images, information and stories are collected in a way which does not harm people or the environment
- o. Photographs should be used in context and should be a true representation of events
- p. Images accompanying stories of specific projects should be of the mentioned project whenever possible
- q. The images and stories that are used will not endanger the people they portray or their environment and will protect their safety and rights
- r. Images should be clearly labelled/captioned
- s. Captions related to images should be fair and accurate
- t. When the names of subjects are included in stories, articles or photos, only the first name of the person/persons are given in order to preserve confidentiality and protect identity. In the case of children, agreed upon pseudonyms will be used.
- u. Before publishing material, the content is reviewed and approved by the Marketing Manager and an International Program Department representative to ensure the material is communicated truthfully and ethically
- v. Images must not be visually altered or direct quotes changed or edited after they have been obtained
- w. At the end of the image/story acquisition, the contributor will be provided with a visual and written page to keep

**3. In our commitment to our donors, we will ensure that:**

- a. Donors are informed about the purposes for which funds are being raised and have access to information about the programs supported by their donation
- b. We have available reports that document the outcomes and progress of the projects which are supported by donations
- c. We provide training and presentation materials to volunteers to ensure that presentations accurately reflect the work carried out by The Leprosy Mission
- d. Where fundraising programs are designed to benefit development and non- development activities, we provide choice, allowing donors to contribute to either activity
- e. Our communications to donors does not violate our Privacy Policy
- f. The Public Engagement Policy is made available to donors on the website
- g. Donors receive feedback through appeals, magazines, updates, social media, the TLMA website and personal communication regarding results of activities and new learnings

**4. To ensure that we attain best practice and maintain our legal and regulatory obligations in fundraising we will:**

- a. Ensure key fundraising staff are members of the Fundraising Institute of Australia and periodically attend relevant training
- b. Conduct, at a minimum, annual training workshops for staff involved in fundraising that cover regulatory requirements and best practice
- c. Provide induction training covering this policy to any volunteer or agent engaged in fundraising on behalf of TLMA

- d. Ensure that anyone engaged in soliciting funds on behalf of TLMA, has documentation that confirms their bona fides and identifies them as paid staff, volunteers or agents of the organisation
  - e. Ensure that whenever we use agencies or third party organisations to assist with or fundraise on our behalf, these relationships will be governed by written contracts that specify the expectations, responsibilities and obligations of each party.
  - f. Ensure that Return to Sender mail is logged in the Customer Service Register and if no success of recovery after a reasonable attempt is made to contact the addressee, then the record is to be marked – Do Not Mail by Reason of Unknown.
  - g. Continue to service customers with trading catalogues until they are also categorized as Return to Sender at which point they will also be marked - Do Not Mail by Reason of Unknown.
5. **In our communications we will comply with the ACFID Code of Conduct, being particularly conscious that:**
- a. We will not engage in activities which bring the sector into disrepute
  - b. Any communication regarding another NGO or partner will be factually accurate and will not intentionally or otherwise mislead
  - c. We will collect and use information ethically, ensuring that communications are accurate, respectful and protect privacy and dignity
  - d. Any communication regarding other ACFID members will not make statements with the intention of creating a reputational or other advantage to TLMA
  - e. A copy of this policy will be provided to agencies, consultancies or individuals who advise or assist TLMA in their public engagement, communications or fundraising activities
  - f. As a signatory to ACFID, TLMA will comply with ACFID's revised Code of Conduct (effective 1 June 2017), which stipulates that communication will consistently show evidence of the separation of development and non-development activities. This will occur in programming, expenditure reporting, fundraising, advocacy campaigns
6. **Whenever an appeal or fundraising initiative is designated for a specific project, we will include in the appeal a footnote that states "Should this appeal be oversubscribed, excess funds shall be applied to general funds, where they may be distributed to similar projects."**
- We will, to the best of our ability, match the size of our marketing effort to the size of the fundraising goal.
7. **In our communications we will acknowledge the support of the Australian Government for ANCP-funded projects, in accordance with the DFAT Branding Guidelines and the ANCP Manual, by:**
- a. Providing written and verbal recognition of this support
  - b. Using appropriate logos, including the Australian Aid Identifier, and other standardised wording
  - c. Having a disclaimer in all publications that the use of Australian Aid and DFAT funding and logos does not imply that the Australian Government endorses the views or information contained in our publications
  - d. Communicating about Australian aid and the ANCP through our social media accounts, including events and achievements
  - e. Embracing broader opportunities to promote and acknowledge the Australian Government's support