

Nusa Tenggara Association

Communications Policy

v1.1 July 2021

Preamble

The mission of the Nusa Tenggara Association (NTA) is to alleviate the worst poverty in the province of Nusa Tenggara Timur, Indonesia. The NTA sponsors economic and social development activities selected by our sponsored communities, ranging from building water tanks and wells, through providing farming equipment and training to local farmers, to supplying books for schools and training local teachers. We partner with organisations that employ and provide training to over 20 Indonesian staff in West Timor and Flores. Several of our programs involve interaction with children and all of our programs impact children either directly or indirectly.

Overview

This document provides a general overview of the various forms of communications undertaken by Nusa Tenggara Association and a policy for Nusa Tenggara Association staff and volunteers.

All staff and volunteers who are engaged by Nusa Tenggara Association are expected to adhere to this communications policy.

Purpose

The purpose of this communications policy is to ensure:

- Nusa Tenggara Association adheres to essential regulatory requirements, and basic industry standards;
- Nusa Tenggara Association staff and volunteers comply with the Organisation's policies covering protection of children and vulnerable people;
- All external communications reflect Nusa Tenggara Association's Strategic Plan and values;
- There is an appropriate framework in which the right to privacy of children, families, teachers, principals and all other people with whom the organisation is working with are considered and respected; and
- There is an appropriate framework in which the right to privacy of Nusa Tenggara Association staff is considered and respected.

Definitions

Communication

Communication encompasses all forms of contact between representatives of Nusa Tenggara Association and others, including but not limited to: donors, partners, supporters, staff, volunteers, all recipients of support under any Nusa Tenggara Association programs and members of the general public utilising a range of communication tools.

Communication Tools

The sharing of information using the following Communications Tools constitute forms of contact:

- Visual – photos and videos;
- Verbal – conversations, including when attending meetings and telephone conversations;
- Digital Platforms - email, PowerPoint presentations, the website, social media including Facebook, Instagram, Twitter, WordPress;
- Written – formal correspondence, brochures, advertising, media releases, new articles, presentations, and other forms of promotion and information dissemination.

Internal Communication

All forms of communications that occur between representatives of Nusa Tenggara Association (staff, volunteers, board, consultants), that takes place as part of daily interactions with one another, and is not shared with any external stakeholders.

External Communication

Any form of communication undertaken by representatives of Nusa Tenggara Association to external individuals, groups and the general public.

Personal Information

Information regarding the personal lives of representatives of Nusa Tenggara Association, such as details regarding their family, friends, political and religious beliefs, and views and opinions on matters outside the scope of Nusa Tenggara Association operation.

Professional Information

Information that directly relates to the operations and activities undertaken by Nusa Tenggara Association, or is formed on the basis of those operations and activities.

Regulatory Authorities

There are a number of Government and independent organisations which Nusa Tenggara Association is required to report to, either as a result of voluntary subscription or in order to maintain a certain form of accreditation. These include the Department of Foreign Affairs and Trade, The Australian Council for International Aid and the Australian Charity and Not-for-profits Commission. The Nusa Tenggara Association also reports to major donors.

Overarching statement

Nusa Tenggara Association encourages free flowing communications across all aspects of its activities and actively seeks additional members of the public who will communicate in any way about Nusa Tenggara Association in any medium. However, Nusa Tenggara Association is mindful of the need for communications to be appropriate and respectful, in context and intent, as well as being honest and timely. Therefore it is essential that no material is published on behalf of Nusa Tenggara Association without the prior authorisation of the CEO, or his or her designated representative, including the Executive Officer and Operations Manager.

Principles governing all communication

- **Transparency and accuracy:** Initiators of communications with stakeholders will take all reasonable steps to ensure that their messages in any form of contact are accurate and transparent at all times.
- **Timely and proactive:** Communications with stakeholders will be timely such that important and relevant information is communicated within a timeframe that takes into consideration the stake that the other party has in the matter. Similarly, where information becomes available to Nusa Tenggara Association which is relevant to a stakeholder, Nusa Tenggara Association will proactively look to make the necessary communication.
- **Sensitive and accessible:** The appropriate form of communication and the means of delivery will depend on the medium used. Some information may be appropriate for regular newsletters but other information may need sensitive communication to a specific individual. Reference should be made to the CEO or his or her representative as specifically delegated, including the Executive Officer and Operations Manager, to handle a particular matter for guidance where a matter is not perfectly clear.
- **Respectful:** In all interactions with others, Nusa Tenggara Association staff and volunteers are required to treat the party with whom they are communicating with the utmost respect for their dignity, values, history, religion, language and culture, and to protect their safety and rights. While employed by the organisation, Nusa Tenggara Association staff and volunteers must act as representatives both inside and outside the workplace, and take care to uphold the organisation's values, show respect and humility, and take all necessary measures to avoid offending others in all communications.
- **Privacy:** Nusa Tenggara Association will at all times respect the privacy of every individual and will not publish or in any way communicate personal information about that person without his or her permission and without him or her providing that personal information freely. It is acknowledged that at times there may not be clarity of whether that permission has been granted in the full knowledge of how it will be used and in such cases the test is whether or not that information could bring any personal harm, difficulty or notoriety from its publication, to them or members of their family or their associates.
- **Information that will or will not be communicated:** In addition to private information as referred to above, solicitous, malicious, defamatory or other unsubstantiated information will not be communicated. In all cases communications will confine themselves to Nusa Tenggara Association' activities representing its philosophy and values and will not deviate into areas that are not relevant to the organisation's objectives.
- **Communication timetables:** In general, communications will take place according to a pre determined timetable. This includes updates to donors about projects they have contributed towards, financial information in the form of Annual Reports, meetings of staff, the executive, Committee or the Board, or newsletters. However this policy does not override the need to provide information in a timely manner as stated above such that the regular reporting cycle may need to be augmented by matters of immediate import. Such decisions are to be taken by the CEO or his or her designated representative, including the Executive Officer and Operations Manager, in a particular instance.

Outgoing marketing communications

Nusa Tenggara Association strives for consistency and veracity in message with respect to all materials that are submitted to those who Nusa Tenggara Association wishes to engage in its activities. As such, key items of marketing material, including use of images, are to be approved by the CEO or his delegated representative, such as the Executive Officer and Operations Manager,

as he or she determines relevant for the particular circumstances. In all cases, marketing material will consider:

- Appropriate portrayal of local people: Nusa Tenggara Association will ensure that the use of images and messages portraying women and men, boys and girls in their communications respects the dignity, values, history, religion and culture of the people portrayed;
- Honesty and transparency application: Images and messages will honestly portray the diversity of local people including age, disability and other marginalised groups. Images and messages will also honestly convey the context and complexity of the situations in which local people live;
- Privacy application: Key figures in images will be informed of what the image is being used for and if possible, their permission obtained. Care will be taken to ensure that the identification of or use of images of local people will not endanger the people they portray. NTA will act consistent with the NTA Privacy Policy;
- Copyright: Origins of any images used will be known and any necessary permissions, including copyright releases, be held;
- Child Protection: In all instances Nusa Tenggara Association will ensure that the use of messages and images comply with its policies covering Child Protection;
- The collection of information, images and stories does not harm people or the environment;
- Applies to all information, stories and images collected for research, evaluation, and donor and supporter purposes; and
- Consistency with ACFID's Fundraising Charter.

Photography

Staff and volunteers should be mindful of the following if they are photographing or filming a child:

- Assess and endeavour to comply with local traditions or restrictions for reproducing personal images. If in doubt, queries are to be directed to the program team leader in the first instance or the Nusa Tenggara Association Operations Manager;
- Wherever possible, obtain consent from the child and a parent or guardian of the child. The intended use of the photograph or film should be explained to the parent or guardian of the child;
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner;
- Ensure images are honest representations of the context and the facts; and
- Ensure photograph or film labels do not reveal identifying information about a child when sending images electronically.

Compliance

Nusa Tenggara Association will comply with the visual identity guidelines supplied by its donors. For example, upon receipt of funding from the Australian Government Department of Foreign Affairs and Trade (DFAT), Nusa Tenggara Association will comply with the Visual Identity Guidelines supplied. Nusa Tenggara Association will ensure that any implementing partners that the organization may agree to work with will also comply with these guidelines.

Use of funding

Communications with donors or potential donors must clearly articulate how their funds will be used, highlighting the definition of restricted or unrestricted, and accord with the principles set out in the Fundraising Policy.

- Restricted Funds – all funds donated under contract with a restriction on use. Implications of use in application phase are not guaranteed, unless specified in signed documentation.
- Unrestricted Funds – funds that can be directed to any area that Nusa Tenggara Association chooses, including and not limited to operating expenses and overheads. Where funds may be used for a variety of purposes at the discretion of Nusa Tenggara Association (i.e. unrestricted funds), no assertions will be made that the funds will be used for a specific activity or activities. Rather the language used will make it clear that the charity will direct funds to the areas/activities in most need in order to ensure that operations are maintained and can grow as a result of donations. A link to the website will be provided where details of all activities can be obtained. An agreement will be drawn up for donors, which will encompass all of the points above. In campaigns or grant applications, examples of projects or activities may be used for illustrative purposes, but this does not guarantee a specific use unless the donor makes a specific request and Nusa Tenggara Association subsequently signs an agreement acknowledging our responsibilities in this regard.

Responses to requests for information

Requests for information should be passed to the relevant Nusa Tenggara Association representative or staff member as appropriate. If communicators are responding to a specific request for information and are not certain of the veracity of an assertion or do not have the requisite information, they will acknowledge their position and refrain from comment. Instead they will refer the matter to the appropriate person within Nusa Tenggara Association.

Communicators will also refrain from comment where they are being asked for an opinion or to speculate on an outcome unless they have been specifically allocated that area of responsibility by the CEO or the Board.

Responses to enquiries from the media

Media management is the responsibility of the Board in the first instance and delegated to the CEO or, in particular instances, to the person designated by the CEO, such as the Executive Officer and Operations Manager. Individuals are not authorised to respond to questions from the media on any subject unless as part of a particular campaign that has been approved by the CEO or the person designated by him or her.

Communications regarding other NGOs

While implicit already in this Statement and embedded in Nusa Tenggara Association' values, specific reference is made to communications relating to other NGOs. At times the actions of other NGOs may appear to be competitive or lacking the spirit aimed for by the philosophy or values of Nusa Tenggara Association. It is essential that no such appearance is given in any communications. On the contrary, recognition of the positive impacts from the work of others is always the stance to be taken. Communicants must ensure that communications are respectful and do not denigrate other agencies or make inaccurate or misleading public statements concerning their work for any reason including obtaining a reputational or other advantage for Nusa Tenggara Association.

Webpage

Nusa Tenggara Association will use its webpage to make key documents readily available to stakeholders and to advise on recent achievements.

The webpage will provide with:

- A description of Nusa Tenggara Association's vision and mission;
- Information on our activities in Indonesia;
- Details of Board and Committee members;
- Contact details for Nusa Tenggara Association;
- A copy of the annual report including the audited financial report;
- A copy of our current policies;
- Identification of the ability to lodge a complaint against Nusa Tenggara Association and a point of contact in that regard; and
- Identification of the ability to lodge a complaint for breach of the ACFID Code of Conduct.

Annual reporting

Nusa Tenggara Association will use its annual report as a key part of its accountability to all stakeholders. A written annual report will be produced and be made available as a downloadable document from the website to all stakeholders including staff, volunteers, supporters, partner agencies, and members of the public. Key stakeholders will be notified upon the publication of an Annual Report.

The annual report will provide stakeholders with:

- A description of Nusa Tenggara Association's vision and mission;
- A copy of the audited financial statement;
- A description of the most significant aid and development activities undertaken during the reporting period and their impact;
- A report by the management and CEO;
- Identification of the ability to lodge a complaint against Nusa Tenggara Association and a point of contact in that regard; and
- Identification of the ability to lodge a complaint for breach of the ACFID Code of Conduct with the ACFID Code of Conduct Committee and a point of contact in that regard.

Communications with in-country stakeholders

Nusa Tenggara Association is committed to communicating with in-country partners through regular meetings, most of which are held during the twice a year field visits. These meetings will be used to listen to, and discuss with, partners and recipients about activity progress, any issues and problems encountered, options for addressing issues and setting priorities for future efforts. These meetings are also used as an opportunity for partners and recipients to raise or report on matters including possible child protection issues, fraud and other complaints. Where possible, either the contact officer from NTA (Australia) or NTA (Indonesia) will participate in these meetings. Note: it is common for two teams to undertake the field visits simultaneously and where possible at least one of the contact officers will be placed with each team.

NTA Indonesia (NTA-I) and NTA Australia (NTA A) produce a report of key findings for each field visit and these are provided to partners and NTA Board and Committee members. These reports do not include information of a personal nature. Reports will be posted on the NTA webpage.

NTA-I undertakes field visits and reports in between the NTA A field trips. NTA-I and NTA A meet regularly using telephone facilities and regular reports are provided via email.

Meetings are held with:

- Community groups (kelompok) and schools at least once per year;
- Relevant local in-country organisations (e.g. education, agricultural extension and planning) at least once per year;
- Partner organisations at least twice per year; and
- Regional community meetings once per year (covers most schools and kelompok).

Transparency Policy

Representative: Any person acting on behalf or under the name of the Nusa Tenggara Association including Board Members, volunteers, contractors, consultants, partners and staff.

The Nusa Tenggara Association:

- Is committed to being transparent in our work and accountable to our stakeholders and community. We are committed to disclosing timely, relevant and accurate information in an accessible format.
- Is committed to transparency and integrity in our financial management (see Financial Management Policy). This is demonstrated by external auditing of Nusa Tenggara Association finances by a registered company auditor. The resulting annual financial report is reviewed by the Board at the Nusa Tenggara Association annual general meeting and made available to all stakeholders on the Nusa Tenggara Association website.
- Shares information regarding our governance structure, legal status and organisational purpose.
- Will disseminate information about results and lessons to all stakeholders – primary stakeholders, partners and donors
- Shares information of formal partnerships with other organisations.
- Shares organisational policies that are relevant to stakeholders external to the organisation.

How to make a request for information

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

- email to enquiries@nta.org.au
- mail us a letter to PO Box 5080 Garran ACT 2605 Australia, or
- contact our local partner.

How to respond to requests for information

- Acknowledge the senders request for information once received. This may be by an email notification.
- Confirm that the information requested is on the approved list for distribution.
- Collate information and send to the requester.

Reviewing this statement

This statement will be reviewed every 5 years or as necessary to assess its effectiveness, appropriateness and accuracy.

Version control

NTA Communications Policy

Version	Date	Approved by Board	Details
1.0	April 2019	20 April 2019	Approved out of session
1.1	July 2021	July 2021	Inclusion of Transparency Policy, EDMF Framework plus other minor amendments

APPENDIX – ETHICAL DECISION MAKING FRAMEWORK FOR THE NTA COMMUNICATIONS POLICY

PURPOSE

The NTA Ethical Decision Making Framework for Communications Policy (EDMF) is a tool to guide NTA in the use of communication so that it aligns with NTAs Vision and Mission.

The EDMF commits to the use of images and messages in communications in a way that portrays the affected people in a manner that respects their dignity, values, history, religion, language and culture, and is authentic to the context, person and terms of consent given.

This EDMF is aligned to the Australian Council for International Development (ACFID) Code of Conduct Principles 6.2 and 8.1:

Commitment 6.2.1 – Members' communications are accurate, respectful, and protect privacy and dignity; and

Commitment 8.1.2 - Members report their compliance with the ACFID Fundraising Charter annually to their own governing body.

It is also noted that the following ACFID Code of Conduct Principles support ethical communications:

- Quality Principle 1 - Rights, protection and inclusion
- Quality Principle 2 - Participation, empowerment & local ownership
- Quality Principle 4 - Quality and effectiveness
- Quality Principle 6 - Communication
- Quality Principle 7 - Governance
- Quality Principle 9 - People & Culture

Any exemption to this EDMF must be approved by the Chief Executive Officer in writing.

TO WHOM DOES THIS APPLY

This EDMF applies to NTA Board Directors, committee members, employees, contractors and volunteers in relation to their work with/for NTA. The EDMF also applies to visitors to our programs, contractors, partner organisations and other external parties using our stories, images, name or logo.

NTA has processes in place to ensure the procedures and tools for seeking consent meet ethical guidelines are available in Bahasa Indonesian.

APPLYING THE EDMF

Making Ethical Decisions

The EDMF outlines the process to make ethical decisions when creating and publishing communications content.

This EDMF sets out the questions that ought to be asked throughout the storytelling process. The development of stories and articles often requires making judgement where there may be no clear “right of wrong” ethical decision. The EDMF assists in how to make decisions in such situations and who should be consulted.

NTA considers the risks associated with its communications activities and how they might impact on:

- Communities in which we work;
- Contributors;
- Staff and volunteers;
- The Board;
- Partners and contractors;
- Supporters and the general public; and
- The reputation of NTA and other ACFID members.

NTA recognises the following risks:

- Harm or damage to primary stakeholders through misrepresentation of their identity, culture, experiences, situation, or an event, or in any other way impacting on their dignity;
- Harm or damage to primary stakeholders by exposing their identity or information or breaching their privacy rights;
- Harm or damage to primary stakeholders by storytelling in a manner that results in moral judgement of them, their culture, or community; and
- Damage to the reputation of NTA as a result of one or more of the above.

ETHICAL FRAMEWORK

Connection to values

NTA’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?

Rights of key figures

NTA is committed to protecting the rights of key figures in its communications

Human rights

- Have we put the best interests of the key figures first?
- Have we ensured we do no harm to the key figures during the story telling process?
- Have we treated the key figures with dignity and fairness?
- Have we respected the personal freedom and privacy of the key figures?
- Have we encouraged the key figures to freely express their thoughts and feelings?
- Have we ensured the content is accurate?

Children's rights

- Have we ensured the best interests of children have been put before the interests of adults and the NTA?
- 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

- 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

NTA puts the wellbeing of its stakeholders first. We explain how we protect our stakeholders in the Human Rights Policy, Privacy Policy and Risk Management Framework for NTA. All staff and stakeholders must uphold these policies. Our discussions around storytelling should ask:

Protection of life

- Could the key figure's life be put at risk by sharing their story?
- Do we know enough about the key figure's history to make a confident assessment of their safety?

Protection of health

- Could the key figure's health be put at risk by sharing their story?
- Could the key figure's risk being cut off from important services by sharing their story?

Protection of dignity

- Could we be putting the key figures or their community at risk of vilification or retribution by sharing their story?
- Have we considered how the key figure's family, friends and community might feel about the storytelling project?

Protection of identity

Publishing sensitive information about people can cause them harm and distress. To protect people, it is sometimes necessary to conceal their identity and/or other details when sharing their stories.

Informed consent

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 considerations should be considered when obtaining consent.

Correct information

- Have we provided the information needed for key figures to decide whether to consent to participate?
- Have we shown the key figures appropriate examples of how their story might be used (including where it may be published and who will see it)?
- Have we consulted with the right people (including children's guardians and community elders)?

Clear comprehension

- Do the key figures understand the risks and opportunities associated with sharing and publishing their image and story?
- Have we explained the storytelling process in a way the key figures understand (including children), using the best-possible language?
- Is there a single point of contact for the key figures to discuss the project and any consent issues?
- Is it easy for the key figures to discuss the project with us?

Voluntary consent

- Is there a power imbalance between the key figures 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 consent?
- If there is an element of duress, how can we address it?
- How can we ensure the key figures can say no to being involved in the storytelling project?

Privacy

NTA values and upholds the privacy of its key figures. All staff, directors, partners and volunteers must abide by our privacy policies. There are also context-related issues that arise in relation to privacy in the capture of Images and Stories. Our discussions should ask:

Protection

- Have we adequately protected the privacy of the key figures?
- Have we discussed how the key figure's story may expose them to the public?
- If appropriate, have we adequately concealed the name, location and visual identity of the key figures?

Information storage

- Have we safely and securely stored the key figure's personal information?
- Do the key figures understand how their personal information is stored and used?

Access to information

- Who has access to the key figure's information and are they aware of who can access it?
- Have we explained how the key figures can access their personal information, make

amendments to their story and withdraw consent?

Authorship and ownership

NTA respects the right of key figures to control their stories. We also respect the right of the contracted writers and photographers to moral ownership of their works. Consistent with our Privacy Policy the following should be considered 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?
- Do we ensure contributors and content creators understand their legal rights?

Roles and responsibilities

- What are the different roles of those involved in the storytelling project?
- Does everyone in the project understand their role and others' expectations of them?
- How do different people involved in the project see the purpose of the storytelling project?
If there are different perspectives, how do we manage any conflicts?

Where to go for help

Making decisions about some of these issues can be difficult. There may be times when we can still be unsure whether an image, story or information should be used even after discussing the key issues and reviewing other policies and guidelines.

During the entire storytelling and publishing process we revisit 3 key questions:

1. If I share this story, will this person be safe?
2. If I share this story, will this person be empowered?
3. If I share this story, will this person feel respected – by themselves and others?

In the first instance the following people should be consulted for clarification:

- In Australia – Chief Executive Officer, Executive Officer, Operations Manager, Secretary
- In Indonesia – Founder NTA Indonesia, Program Manager NTA Indonesia, Regional Manager NTA Indonesia (in Flores)

The Chief Executive Officer will discuss any issues relating to the use of an image, story or information with NTA's staff and members and will make the final decisions relating to communication materials.

Breach

A breach of this Policy may result in disciplinary action that may involve severance from the organisation.

Contact

Executive Officer

enquiries@nta.org.au

Telephone 0406930835