



Informed Consent and Communication Resources Policy, 2021

Policy Statement

Transform Aid International (TAI) uses images and information about people and projects in communication, media, promotion, publications, education material and public awareness activities. TAI may also share images and information with likeminded organisations for their use to further the TAI vision.

TAI is committed to communication that respects the dignity, values, history, religion and culture of the people portrayed, both in Australia and overseas. One aspect of this respect is ensuring “Communication Resources” are collected, stored and used on a basis of “Informed Consent”, as defined within this policy.

Informed Consent requires participants to understand why stories are wanted about them, how the stories may be used and who the audience is likely to be. Consent must be freely given, prior to filming or interviewing, and based on an understanding of the opportunities and risks of sharing their story. Consent may be withdrawn at any time and participants can choose if they wish to be identified or not.

Scope and Purpose

The purpose of the Informed Consent and Communication Resources Policy is to provide guidelines in the ethical collection, storage and use of Communications Resources. This is a reflection of our mission, values, and approach to community development, and is in accordance with the current Australian Department of Foreign Affairs and Trade (DFAT) Guidelines and the Australian Council For International Development (ACFID) Code of Conduct.

This policy applies to “Staff”, including Board members. This Policy will be published to Staff through the intranet and/or to others as required. All individuals involved in collecting, storing and using Communication Resources must read this document. In the event of any uncertainty or questions over making ethical decisions related to gaining consent and capturing resources, staff must raise these with their manager/director. The final decision on all communication materials lies with the CEO.

The Informed Consent and Communication Resources Policy applies to TAI and any brands operated by TAI, including Baptist World Aid Australia (BWAA), the primary brand used for engaging Australian constituents. This policy refers primarily to TAI from this point.

Policy Objectives



TAI has the vision of “a world where poverty has ended and all people enjoy the fullness of life God intends”. This vision is based on principles of individual agency and respect for all people. The objective of this policy is to ensure these principles are upheld in the collection and use of all Communications Resources.

All communication will align with the policies and procedures set out by TAI, with particular reference to the Communications Policy.

Policy Detail

1 Informing participants of the uses of Communication Resources

As defined below, Informed Consent is permission granted by an individual to allow the collection and use of Communication Resources for expressed purposes and for an agreed period of time. To be considered informed, a “TAI Representative” or “TAI Partner” must provide a clear explanation of the reasons and intended uses of Communication Resources along with the opportunities and risk associated with sharing their story, tailored for each participant as necessary. For example, this could include translation of consent documents to the local language where appropriate, child friendly consent processes, and so on. Every participant has the right to choose whether to provide consent, and efforts should be made by the TAI representative to reduce any sense of pressure or duress, and give adequate time for participants to consider the risks and opportunities. Informed Consent must be freely given, and participants may withdraw their consent at any time.

Informed Consent is a part of our development work and a practical expression of our principles of individual agency and respect for all people. TAI considers that ownership of an image or story belongs to the contributor, and that they should determine how they are portrayed, if they are identified (where protection issues allow) and how their story is told. TAI Representatives are required to comply with this policy as a demonstration of our commitment to these principles, both to the project participants that we work with directly, as well as the project’s broader community.

As such, should TAI Representatives (including 3rd party contractors) wish to collect Communication Resources for their own use while in a project’s community (or travelling to and from a project’s community), the standards set in this policy apply. Any such resources obtained by TAI Representatives should therefore be collected using informed consent processes of their own.

Important TAI supporting documents for the practice of informed consent include the Collection of Communication Resources Procedure, the Informed Consent Explanation Guideline, the Informed Consent forms and the communication collateral pack.

In circumstances where it may not be possible to obtain informed consent, such as in certain emergency contexts, basic principles of dignity remain. In certain other cases, informed consent is not required, but is always recommended where practical: photos of Staff, photos of TAI partners, public figures in public, crowds in public, participants in public campaigns or programs, or people who are non-recognisable.

2 Children and Youth



TAI requires mandatory Informed Consent from a child's parent or guardian, in addition to gaining consent from the child/youth themselves.

TAI is committed to upholding the rights of children and youth, any person under the age of 18. We work to create environments that encourage children to give their opinion and adults to listen and take them seriously. We recognise a child's right to their privacy.

The need for Informed Consent is as important for children, but a particular focus for TAI to ensure consent is informed and obtained in an appropriate way for children, specific to their situation.

3 Ability to provide informed consent

Some people have limitations in their ability to provide informed consent. This may be due to their age, their health or their intellectual functioning. Language barriers are not recognised as a limitation as they can easily be overcome through translation.

For Informed Consent to be given the person must fully understand the information being explained to them. If the person does not understand what is being asked of them, even though every attempt has been made to help them understand it, they may be unable to provide consent. If this is the case a legal carer or guardian will need to provide consent on their behalf. If it is clear that the person will be unable to provide their own informed consent, consent should be sought from the carer or guardian from the outset. If no guardian or carer can be found, then no consent is obtained and the person's information and images cannot be collected.

4 Thorough Informed Consent Briefing

Prior to the collection of any resource or interview with participants, both in Australia and overseas, the TAI Representative or TAI Partner must consider the ethical issues of sharing an individual's story (on their safety, empowerment and self-respect) and if acceptable to proceed, then discuss the issue of Informed Consent. This involves explaining the intended and possible uses of Communication Resources with examples; explaining the possible risks of sharing their story; explaining that there is no monetary compensation given for sharing of their story; and explaining the appropriate avenues for the participant to recall their Informed Consent. TAI Representatives should also explain that where images are used online, because of the permanency of the internet, some copies of their image may remain online even if they decide to withdraw their consent and TAI removes their images from its platforms. The TAI Representative or TAI Partner must also allow opportunity for the participant to consider and ask any questions or raise any concerns. Without a thorough Informed Consent conversation, Informed Consent cannot be considered to have been obtained.

All TAI Representatives who visit the field for resource collection will first be trained in how to conduct a thorough Informed Consent conversation, as well as taking part in ongoing training around issues relating to consent, power imbalances, unconscious bias, privacy and protection.

Where TAI Representatives feel there is an ethical issue where no clear right or wrong answer is obvious, they should discuss the issue with their manager/director, child safeguarding officers, and local partners and ensure that an ethically right decision can be made (without any remaining concerns) before proceeding. Where risks to the participant, concerns or lingering doubts exist, no communications materials will be sought or obtained.

5 Types of Informed Consent records

It is important that Informed Consent is recorded, retained, and linked to stored Communication Resources. However, it is critical that each of these records of consent be based on a thorough Informed Consent conversation with the participant.

There are three acceptable types of Informed Consent record listed below in order of preference:

5.1 Signed declaration of verbal Informed Consent

TAI Representative or TAI Partner may judge that Informed Consent is most appropriately or practically recorded by signing a declaration of verbal Informed Consent (e.g. participant does not speak English, participant does not have a high level of literacy, phone interviews and so on).

TAI Representative or TAI Partner must complete a thorough Informed Consent conversation with the participant, and then obtain their explicit verbal Informed Consent. A TAI Representative must sign a declaration of verbal Informed Consent relating to the specific set of Communications Resources. A TAI Partner may sign a declaration of verbal Informed Consent or confirm that Informed Consent was obtained through email communication. The declaration is to be retained and linked to the stored Communication Resources.

This is the organisation's preferred and recommended record of Informed Consent as it prioritises respect for the participant and puts them at the centre of the process.

5.2 Written Informed Consent



Following a verbal explanation of Informed Consent, the TAI form (where practical, in the participant's language) or a TAI Partner form is provided to re-state the key aspects of consent and provide fields for the date, the participant's details and the participant's signature.

When obtaining consent for a child, the form may be signed by the child as appropriate to the context but must be signed by their parent or guardian. An Informed Consent form tailored to children under the age of 12 has been created for use by TAI Representatives or TAI Partners as appropriate.

5.3 Filmed Informed Consent

A participant's explicit informed Consent may be captured on film, after a thorough Informed Consent conversation has been conducted. Such consent is to include a brief restatement of what has been discussed with the participant, as well as the participant's explicit Informed Consent. This approach is most useful when the Communication Resource is video footage.

6 Temporary storage of Communication Resources

TAI and their representatives are to make all reasonable endeavours to securely store Communication Resources whilst in-transit. From the time Communication Resources are collected to the time they are stored securely in the TAI systems, TAI representatives are to take all reasonable steps to protect Communication Resources from theft or misuse, such as:

- Storing Communication Resources on a password protected online library
- Storing Communication Resources on a password protected laptop, flash drive or external storage
- Physical securing storage devices

TAI representatives are also required to make all reasonable efforts to securely store Informed Consent records whilst in-transit, along with copies of any other permissions to collect Communication Resources and be able to produce these to demonstrate that the collection of Communication Resources is for legitimate reasons.

7 On-going storage and removal of Communication Resources



Communication Resources and Informed Consent records will be stored securely within the TAI Digital Asset Management (DAM) system for a period of 10 years. Security of the Communication Resources is ensured by limiting access to the DAM system to those TAI staff who require access, primarily Marketing and IT teams. The Marketing team will share specific Communication Resources with other parties in order to create communication or fundraising materials, in line with the Communications Policy and Fundraising Policy.

There are four exceptions to storing Communication Resources in the DAM system:

- 7.1 Child Partner forms** are stored securely on the TAI network, with folder access limited to staff administering Child Sponsorship and the IT Department. These profiles are integrated with the CRM and wider IT system, complicating centralisation into the DAM system. Child profiles are printed for reporting to supporters, managed by the Regular Giving Team and processed by volunteers onsite.
- 7.2 Very large files** such as RAW photo files or unedited video footage, as they are too large to store online. These files are stored on physically secured external hard drives, stored securely and accessible by the TAI IT Administrator or TAI Executive. The TAI IT Administrator provides these hard drives to relevant TAI staff, primarily Marketing, as required.
- 7.3 International Programs reports containing photos** are stored securely on the TAI network, with folder access limited to International Programs, Marketing and the IT Department. Such reports are reviewed by Marketing to identify Communication Resources that may be used in future communication or fundraising, and are subsequently stored on the DAM system. However, all reports must be retained and accessible by International Programs for the management of programs.
- 7.4 TAI documents and presentations containing photos** are stored on the TAI networks, however contain only Communications Resources that align with the Communications Policy and the Informed Consent and Communications Resources Policy.
- 7.5 Removal of images from TAI systems will take place after 10 years of storage.**
- 7.6 Removal of images where consent is withdrawn.** TAI will promptly remove all versions of images from its online channels as well as versions stored in DAM and other locations, where a participant decides to withdraw their consent.

8 Storage of Informed Consent Records



To ensure that Informed Consent has been granted for Communication Resources collected by a TAI Representative, Informed Consent records will be tied to digital assets in one of two ways:

- 8.1 **A specific informed consent record from an individual or group linked to a specific asset:** For assets deemed to be focusing narrowly on an individual or small group of individuals (two or three people, or a family). This is the type of asset that will generally be used in TAI communication to tell a specific story, such in fundraising communication.
- 8.2 **A collection of informed consent records linked to a number of related assets:** For assets deemed to be less specifically focused on an individual or small group, in that:
 - 8.2.1 These are isolated assets (for example, one or two photos capturing people who provided informed consent but were not a focus in resource collection), or;
 - 8.2.2 These show individuals or groups, but not as the focus of an image, or;
 - 8.2.3 These consist of a larger group of people (more than three)

Such assets are unlikely to be a focus or 'hero' image used in TAI communication, and will often be part of a large number of varied photographs from a community visit.

9 Use of Communication Resources without linked Informed Consent Records

From 1st July, 2016, all new Communication Resources sourced by TAI will only be stored in the DAM system and used in communication if they are linked to associated Informed Consent records or do not require Informed Consent, as set out in this Policy.

Communication Resources dated prior to 1st July 2016 and stored in the DAM system but without linked Informed Consent records may be used in communication. This recognises the commitment of TAI Representatives and TAI Partners to obtaining Informed Consent but acknowledges the inconsistent retention of Informed Consent records prior to this date.

Communication Resources sourced outside of TAI and without Informed Consent records may be stored in the DAM system and used in communication, providing:

- 9.1 They are sourced from partners, networks or coalitions that TAI staff believe uphold high standards of Informed Consent.
- 9.2 They are sourced from parties that own the copyright and provide permission for use.

Such resources will be recorded in the DAM system as externally sourced.



Responsibilities

Responsibility for the strategic management of the TAI Informed Consent and Communication Resources Policy in the Organisation will lie with the Director of Marketing and Communication.

Responsibility for the operational management of the TAI Informed Consent and Communication Resources Policy will lie with the Communication Manager, Communication Specialists and International Programs Managers.

The importance of adhering to this policy will be addressed with all relevant staff as part of the induction process at commencement of their employment.

This policy will be available on TAI's intranet.

This policy will be reviewed triennially, or sooner as required.

Definitions of the Informed Consent and Communication Resources Policy

Communication Resources: any information or assets about or featuring an individual, group, project or community associated with the work of TAI that may be used in TAI communication to supporters and stakeholders. Communications Resources include but are not limited to photographs, videos, direct quotes, stories and statistics.

Informed Consent: an agreement by an individual to participate in an activity of collecting a Communications Resource and provide permission to use the Communications Resources for the expressed purpose, and for an agreed period of time. Informed Consent is based on a clear explanation of the intended use of Communication Resources and the implications of this use. Informed Consent must be freely given.

Thorough Informed Consent Conversation: a conversation which explains the intended and possible uses of Communication Resources; the possible risks of these uses; the fact that there is no monetary compensation given to a participant for the sharing of their story; and the appropriate avenues for the participant to recall their Informed Consent at any given time. The TAI Representative or TAI Partner must also allow opportunity for the participant to ask any questions or raise concerns.



Staff: employees, Board members, volunteers, trainees and contractors.

TAI Representative: any Staff, any 3rd party contractor (for example photographer, videographer, writer, or graphic designer) and any supporter on TAI supporter trip to a project.

TAI Partner: a local organisation funded by TAI to carry out aid and development projects.

Related Policies and Procedures

- Communication Policy
- Fundraising Policy
- Social Media Policy
- Collection and Storage of Communication Resources Procedure
- Informed Consent Forms
- Verbal Consent Declaration
- Informed Consent Explanation Guideline
- Uploading Assets to the Digital Asset Management System working instruction
- Proofreading Procedure
- Publications Procedure
- Maintaining Website Content Procedure
- Brand Social Media Procedure
- Communication Compliance Checklist
- PSEAH Policy
- Child Safe Policy

External References

The TAI Informed Consent and Communication Resources Policy and related procedures are underpinned by the ACFID Code of Conduct and DFAT Guidelines.