

Informed Consent and Communication Resources Policy

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, where they will be used and who the audience is likely to be. Informed 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 Consent may be withdrawn at any time and participants can choose if they wish to be identified or not.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 Communication 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. 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.

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 Communication 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 Implementing Partner must:

- Provide a clear explanation of the reasons and intended uses of Communication Resources
- Use examples to visually demonstrate how photos or video will be portrayed (where applicable)
- Highlight the opportunities and risk associated with sharing their story

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 TAI's 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.

Documents that support the practice of informed consent include :

- Collection of Communication Resources Procedure
- Informed Consent Explanation Guideline,
- Informed Consent forms and;
- The Informed Consent toolkit.

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, formal Informed Consent documentation is not required, but informal permission is always recommended where practical for photos of Staff, photos of TAI Implementing 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 be overcome through translation.

If the participant 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 deemed appropriate, a legal carer or guardian is allowed 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

Pre-Collection Ethical Considerations

Prior to the collection of any resource or interview with participants, both in Australia and overseas, the TAI Representative or TAI Implementing 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.

Training

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. This training will be conducted by the marketing team.

The Consent Conversation

This involves explaining the intended and possible uses of Communication Resources with the informed consent toolkit; explaining where stories and media may be published, and the possible risks of sharing their story. The conversation also includes 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.

The TAI Representative or TAI Implementing Partners 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 and therefore images collected by TAI will be void and deleted.

Opt-in and-out options

To ensure that participants have agency over what can be collected and where that can be distributed—TAI staff and partners must follow the prompts on the informed consent forms. Participants will have the ability to determine in what formats their story can be published (physical publication and/or digitally), and what may be collected (story, voice, photos and videos).

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. TAI will endeavour to articulate and visually demonstrate this concept in the most culturally appropriate way possible, with the assistance of visual aids.

Informed Consent Toolkit

TAI representatives are recommended to use the informed consent toolkit assets to accompany informed consent conversations. TAI will provide a visual informed consent kit and examples to representatives to ensure participants are informed in the most accurate way possible. This visual resource will consist of a visual guide to informed consent, and a collateral booklet with physical and digital examples.

Digital Informed Consent

In acknowledgement that digital literacy and understanding is different across contexts, TAI representatives are advised to consult partner staff before story collection to gauge how participants may interact with the internet, if at all. The use of the resource pack and visual script will outline how photos or videos that go online can be accessible by many people world-wide.

Participants will be given the opportunity to opt-out of digital content to reduce their personal digital footprint and the potential risks of images being published online.

Ethical issues

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. All consent types must be attained for compliance reasons. It is advised that TAI staff ask local partners which type of informed consent recording method is most appropriate. For example, for participants who have learnt how to spell their names through partner programming, signing forms despite being illiterate could be empowering. However, in some contexts, there is negative association with the signing of legal documents.

It is advised therefore to discuss this before entering a new community to determine how informed consent will be recorded.

5.1 Written Informed Consent

Following a verbal explanation of Informed Consent, the TAI form (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.

5.2 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 on the consent form. If TAI representatives or partners do not have a form in local language, it is advised to use the verbal informed consent method.

TAI Representative or TAI Partner must complete a thorough Informed Consent conversation with the participant, and then obtain their explicit Informed Consent verbally. A TAI Partner may also 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.

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 informed consent forms are not available. For storage reasons is not as practical to hold video informed consent, and therefore is advised when forms are not available to record consent via video.

5.4 If physical forms are lost

There may be instances where informed consent documentation is lost in transit. If this occurs, forms can be filled out in retrospect as a verbal informed consent form with participant details.

In rare instances, a statutory declaration can be made in lieu of documented forms, signed by the TAI representatives who undertook the resource collection and informed consent process.

5.5 Partner-specific Guidelines

Implementing Partners may have their own informed consent policy coverage—either through safeguarding or communication standards. Requirement of compliance with TAI's Informed Consent and Communications Resource Policy are set out in the Project Agreement. TAI may monitor the application of informed consent practices in relation to TAI Communications resources during regular monitoring activities.

TAI will assess and support Partners to socialise and implement their own policies using TAI's and DFAT's (when required) Policy and Code of Conduct as a minimum standard.

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.

For in-person resource collection, TAI representatives must make all reasonable efforts to securely store physical Informed Consent records whilst in-transit, and create digital copies of documentation and save to the organisations digital filing system while in country. These copies should be destroyed from personal devices once uploaded online. Any photographs of participants once uploaded securely online should also be deleted from personal devices within 60 days of travelling.

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.

TAI may archive Communication Resources for historical purposes, however clause 7.6 is enduring, i.e., TAI's desire to keep photos or videos for historical purposes will not override specific requests to withdraw consent. Archived images will not be retained for public use, but for internal educational purposes. This could include evidence of meaningful projects for development training purposes, to have recollection of visits to the field with key figures and employees, or to celebrate internally the aid and development achievements the organisation has seen over the past 60+ 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 five 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.

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.

- 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.
- 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

Images will be stored securely on TAI's Digital Asset Management (DAM) system with informed consent form linked. No images will be saved to the DAM without informed consent. **Use of Communication Resources without linked Informed Consent Records**

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

- 8.1 They are sourced from partners, networks or coalitions that TAI staff believe uphold high standards of Informed Consent.
- 8.2 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 National Engagement.

Responsibility for the operational management of the TAI Informed Consent and Communication Resources Policy will lie with the Marketing Manager, marketing team 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.

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.

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
- Social Media Policy
- Collection and Storage of Communication Resources Procedure
- Informed Consent Forms
- Informed Consent Explanation Guideline
- 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.

Document Control Information

Informed Consent and Communications Resources Policy	
Owner	Director of National Engagement
Master Copy	Policy QA Coordinator
Date created	15/01/2016
Date last reviewed	15/9/2023
Approved by Director of National Engagement	4/12/2023
Approved by Board	27/05/2016
Date next Review	26/07/2026

Date	Version	Revision Description	Reviewed by
15/01/2016		Drafting commenced	Marketing Manager
22/01/2016	1	Reviewed by a cross-functional working group for initial feedback and updated	Marketing Manager
07/03/2016	2	Draft reviewed by cross-functional working group and updated	Marketing Manager
08/04/2016	3	Recommendations from selected members of cross-functional working group implemented	Marketing Manager
11/05/2016	4	Following review by Executive: Update 'Scope and Purpose' to reflect organisational motivation for policy Update Section 3 to clarify that communication resources are not <i>collected</i> unless informed consent is obtained New section: Section 5: 'Temporary storage of Communication Resources'	Marketing Manager
27/05/2016	5	Board approval. Effective dates added.	Marketing Manager
28/06/2016	6	Section 1 updated to reflect responsibility of TAI Representatives beyond of project participants.	Marketing Manager
02/04/2020	7	Reviewed with updates throughout; addition of Thorough Informed Consent; following review by Director Community Engagement	Communication Specialist; Policy QA Coordinator
26/07/2021	8	Updated in line with EDMF and ACFID Remedial actions	Director of Marketing and Communication



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12/08/2022	9	Updated Section 7 to include the archival process for historical purposes	National Engagement Manager, Marketing
15/9/2023	10	Changes to informed consent preference, include section of use on opt-in-and-out approach, informed consent toolkit usage and digital informed consent, removing outdated procedures	National Engagement Manager, Marketing