CLAN Communications Policy & Ethical Decision Making Framework for Communications

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1. Introduction

CLAN recognises the value in using various forms of communication including publications and social media to build more meaningful relationships within global communities, and empowering individuals to engage with others to build their support networks on a local and global scale. CLAN uses publications and social media to increase awareness, advocate, promote support services and events, and share engaging human interest stories to help people understand and engage in the work we do.

CLAN uses an Ethical Decision Making Framework (EDMF) to help make ethical decisions when creating and publishing communications content, in particular, where it might not be immediately clear if an image or story should be published. CLAN uses the framework at important moments during the storytelling process, noting that it is harder to make shared decisions when different people, with different sets of values are involved.

2. Purpose

CLAN's Communication Policy has been developed to inform employees and volunteers of CLAN about the rules around publications and, in particular, social media. It has also been developed to encourage and empower staff so they feel confident to participate in the development of articles and when online whilst being mindful of their responsibilities and obligations under CLAN's Code of Ethics and Professional Conduct Policy.

In addition to this and other guiding policies, the EDMF outlines key issues to be considered such as when discussions should happen, who should be involved and what to do if a decision cannot be made. Importantly the EDMF ensures that the collection of information, images and stories does not harm people or the environment. The ACFID Fundraising Charter provides compliance requirements in this regard and should be referenced when planning a fundraising communication.

3. Scope

This Communications Policy applies to all communications forwarded both internally of CLAN and externally when conducting the business of CLAN. It relates to academic publications, annual reports, newsletters, emails, blogs, website, and all forms of social media.

Social media are online services, platforms and tools that allow for interaction and/or participation as well as publishing, sharing and discussion of information. Social media provides an opportunity
to engage and interact with our various audiences and promote staff expertise. Critically, social media is an area, due to its immediacy in nature, where stories and images can be uploaded without due consideration to the potential harm, breach of privacy or lack of permission may not have been thoroughly given.

Examples of social media platforms include:
1)   Social networking and micro-blogging sites such as Facebook, Twitter, Pinterest, Instagram and LinkedIn
2)   Video and photo sharing sites such as Flickr and YouTube
3)   Online forums and discussion blogs, including comments on online news articles.

4. Definitions

TERM	DEFINITION
Communication	The imparting or exchanging of information by speaking, writing, or using some other medium, a means of sending or receiving information, such as phone lines or computers.
Social Media	Any conversation of activity that occurs online, where people can share information or data that might impact CLAN or the people who use our services.
Official use	When an employee, volunteer or supporter is using social media as a representative of CLAN with the relevant permission from CLAN Executive. Alternatively, when an employee or volunteer is posting from a social media account that is labelled as an official CLAN account, i.e. not a distinct individual.
Personal use	When an employee, volunteer or supporter is using social media as themselves, not officially representing CLAN as an organisation but identifying themselves as affiliated with CLAN through their online biographies, profiles or posts or through other digital platforms.
Ethical	Relating to moral principles.
Ethical Decision Making Framework	Describes steps that can be used to guide an individual in the project management profession through a process to make a decision when confronted with an ethical dilemma.
Unconscious bias	Triggered when our brain automatically makes quick judgments and assessments, which are influenced by our background, personal experiences, societal stereotypes and cultural context.
Dynamic risk assessment	The continuous process of identifying hazards, assessing risk, taking action to eliminate or reduce risk, monitoring and reviewing, in rapidly changing circumstances.
Stories	Help us explain everything in our experience from science to relationships, from feelings to memories, and from questions to objections. And with every story we hear, read, or listen, our mind makes cognitive and emotional connections that shape our perspective of the world.
Informed consent	When a contributor grants permission to publish their story with full knowledge of the possible consequences, including possible risks and benefits. Informed consent must be granted without duress.

5. Managing risk in communications

Managing risk to the reputation of CLAN and maintain trust in the organisation must be considered therefore risk considerations must be made to ensure value based, ethical and lawful decisions are made around posting information. While the concept of a dynamic risk assessment is typically used in an operations context, it is relevant to the more immediate forms of communication such as social media posting to ensure the risk to CLAN's reputation and status of trust is minimised as much as is reasonably practicable. If the situation is such that a decision cannot be satisfactorily made, use the below risk related questions as a guide, noting other risk issues may present, to tease out the issues and the Ethical Decision Making Framework (attached):

1) What consequences could individuals or groups face for contributing to CLAN's communication materials? Are the potential risks greater for certain groups or individuals that you work with? Do existing procedures help mitigate these risks?
2) Are there clear procedures in place for how content is collected, consented to an informed way and approved before publishing? Are existing procedures being followed consistently?
3) What risks do current processes for storing and filing images and information pose to CLAN or contributors, including children?
4) Are CLAN's policies and procedures well-understood and implemented by personnel involved at different stages of the communications process?
5) What role do partners or other third parties have in CLAN's communications process? Do they have the knowledge, capacity and experience to implement any relevant policies or procedures?
6) What areas of CLAN's operations are higher-risk and therefore likely to require additional checks and monitoring?
7) Are there risks to the well-being of staff or volunteers as a result collecting or being involved in communications work?
8) What risks could the sharing of material from third parties (e.g. news outlets) have for CLAN?
9) What are the potential reputational risks created by CLAN's communications materials?
10) Has CLAN had complaints or issues with its communications materials in the past that can be learnt from?

6. Guiding principles and conduct for social media

People who are employees, volunteers or supporters who do not identify themselves as being affiliated to CLAN are still counted as representing the organisation, as the nature of the online world means that they can be traced back to the organisation through their online presence.

Posts made during both official and personal accounts must:

1) Have approval from CLAN to use social media in an official capacity
2) Be presented in the approved style including colour, logo placement, font etc
3) Comply with the CLAN Code of Ethics and Professional Conduct Policy
4) Must not harm CLAN or any person or other organisation
5) Must not promote individual staff and/or volunteer businesses or money making ventures
6) Be cognisant of the influence of unconscious biases

7) Be subject to a dynamic risk assessment or if necessary a thorough risk assessment
8) Be cognisant of relevant legislation covering defamation, bullying and harassment.

CLAN employees and volunteers are encouraged to participate in social media. When interacting on social media sites, whether in an official or personal capacity, it is expected that every participant will comply with following behaviours:

1) Not criticise beneficiaries, colleagues, other service providers or CLAN, or the Australian Council for International Development (ACFID) and not for profit organisations who are signatories to ACFID
2) Respond to others' opinions respectfully and professionally
3) Not do anything that breaches the terms of employment – whether paid or unpaid as a volunteer
4) Not harass, bully or intimidate
5) Acknowledge and correct mistakes promptly
6) Disclose conflicts of interest where able
7) Not knowingly post inaccurate information
8) Link to online references and original source materials directly
9) Be polite, considerate, kind and fair
10) Ensure the activity does no harm
11) Champion CLAN and its services.

6. Official Accounts

An official account of an event or activity that represents CLAN should stipulate that within its bio, page or account description. An official social media page must be sanctioned by the CLAN Executive. The account must carry the following, or a version of the following words:

"This is the official account for CLAN"

followed by a brief description of CLAN and the purpose of the account relating to the particular social media platform.

When representing CLAN, staff and volunteers should:

1) Disclose that you are an employee or volunteer of CLAN and clearly state what you are representing
2) Ensure you adhere to the apolitical character of CLAN
3) Be aware of the terms and conditions of use governing the website upon which you upload or contribute material. These terms and conditions may determine the intellectual property rights and access to content that is uploaded to that particular website.

When providing information on social media on behalf of CLAN the information should:

1) Disclose only publically available information or other information that is authorised to be released
2) Offer only information, support or comment on topics that fall within an area of give responsibility
3) Provide a direct link to information where it is available
4) Ensure any content that is published is factually accurate and complies with privacy guidelines

5) Not disclose any information regarding the travel arrangements or whereabouts of CLAN staff or volunteers travelling to developing countries that may place the efforts of the travel or the CLAN representatives at risk
6) Be mindful of the diverse cultures in which CLAN operates.

8. Personal Accounts

Staff and volunteers should not rely on a site's privacy settings for a guarantee of privacy, and personal privacy settings should be adjusted according to individual needs. CLAN employees and volunteers who identify with CLAN on social media must understand potential risks as information given or statements made could be exposed and made public.

9. Inappropriate Use

Inappropriate use of social media includes, but is not limited to:

1) Conducting a private business on CLAN's social media presence
2) Using discriminatory, defamatory, abusive or otherwise objectionable language
3) Stalking, bullying, trolling or marginalising any individual or group
4) Accessing or uploading pornographic, gambling or illegal content including extreme images of graphic content (blood and gore etc.) or information regarding dangerous activity including drugs, firearms etc.
5) Accessing sites that promote hatred or extreme/fundamental beliefs and values
6) Direct political affiliation, unless an individual is running for election (but only on a personal account)
7) Excessive debate on public policy, religion or cultural issues
8) Uploading information of a confidential nature, especially in regards to CLAN services or beneficiaries
9) Criticising CLAN or other organisation and our/their employees, volunteers or supporters
10) Activity that interferes with work commitments
11) Paid or unpaid endorsement of any kind, including in kind services or gifts
12) Activity that brings CLAN or the persons' professionalism or ability to act in a professional manner into disrepute.

It is the duty of everyone who is affiliated with CLAN to alert the CLAN Executive of any inappropriate content observed on social media. Legal consequences could result in a case where an offense occurs.

10. Complaints through social media

Complaints or negative comments regarding CLAN may be made through social media channels. Both official and personal users of social media are discouraged from arguing or refuting complaints or negative feedback through social media channels. This behaviour can antagonise or fuel further attacks on CLANs services, brand and/or reputation. In the event of a complaint or negative comment, it is important to address the comment as soon as possible with a version of the following: "Your feedback is important to help us improve the way we work. Please consider emailing info@clanchildhealth.org". Alternatively, the complainant should be encouraged to make a complaint to the President of CLAN or the CLAN Executive in accordance with the Complaint Management Policy.

11. Deleting Posts

Social media is fluid, two-way, busy and often self-regulating. Social media should be considered a form of two-way communication and a vehicle to listen to the 'wider' community views. Organisations that heavily control content on their social media pages or accounts through the deletion of disapproving content, significantly reduce the impact and usefulness of social media as a channel for the distribution of information.

CLAN will not delete posts that are complaints, or negative except when they breach any of the conditions outlines for employees, volunteer and supporters in the 'inappropriate use' section outlined in this document.

12. Guiding principles and conduct for emails

Every employee has a responsibility to maintain CLANs image, to use electronic resources in a productive manner and to avid placing CLAN at risk of legal liability based on email use. All messages distributed via CLAN's email system, even personal emails, are CLAN's property. There must be no expectation of privacy in anything that is created, stored, sent or received on CLAN's email system.

Emails can be monitored without prior notification if this is deemed necessary such as if there is evidence that emails are not adhering to the guidelines set out in this policy. CLAN reserves the right to take disciplinary action, including termination and/or legal action. Email is one of CLAN's communication tools and users are obliged to use this tool in a responsible, effective and lawful manner. Although by its nature email seems to be less formal than other written communication, the same laws apply. Therefore, it is important that users are aware of the legal risks of email:

- An email message may go to persons other than the intended recipient. If it contains confidential or commercially sensitive this could be damaging to CLAN
- Letters, files and other documents attached to emails may belong to others. By forwarding this information, without permission from the sender, to another recipient you may be liable for copyright infringement
- Email is a fast form of communication. Often messages are written and sent simultaneously, without the opportunity to check for accuracy. If emails are sent with any libellous, defamatory, offensive, racist or obscene remarks, the sender and CLAN can be held liable
- An email message may legally bind CLAN contractually in certain instances without the proper authority being obtained internally
- Email messages can carry computer viruses. If and email is sent an attachment that contains a virus, the sender and CLAN can be held liable. By opening emails and attachments from an unknown sender you may introduce a virus into CLAN's computer operations generally
- All personal data contained in emails may be accessible under Data Protection legislation and, furthermore, a substantial portion of emails to Government and other public bodies may be accessible under the *Government Information (Public Access) Act 2009* (NSW). Emails should always be regarded as potentially public information, which carry a heightened risk of legal liability for the sender, the recipient and the organisations for which they work.

13. Rules for email use

CLAN considers email as an important means of communication and recognises the importance of proper email content and speedy replies in conveying a professional image and delivering good customer service. Users should take the same care in drafting an email as they would for any other communication. Therefore CLAN wishes users to adhere to the following rules:

1) CLAN's name is included in the heading carried with every message sent by a CLAN employee. Emails reflect on CLAN's image and reputation. Therefore, email messages must be appropriate and professional.

2) CLAN's email system is specifically for legitimate business purposes. However, it is appreciated that it may be necessary at times to forward and receive emails of a personal nature. This is acceptable provided the content respects the guidelines in this policy. The sending of chain letters, junk mail, and jokes is prohibited. All messages distributed via the company's email system are CLAN's property.

3) All emails will carry a disclaimer stating that the email is intended only for CLAN use and if used for any other purpose a named person should be contacted immediately within CLAN.

4) Particular care should be taken when sending confidential or commercially sensitive information. If in doubt, please consult a member of the Executive Committee for guidance and use the Ethical Decision Making Framework (attached) to assist in making the decision.

5) CLAN confidential messages should be distributed to personnel only. Forwarding to locations outside of CLAN in these cases is prohibited.

6) Great care must be taken when attaching documents or files to an email. Letters, files and other documents attached to emails may belong to others. By forwarding this information, without permission from the sender, to another recipient you may be liable for copyright infringement. Again, if in doubt, please consult a member of the Executive Committee for guidance and use the Ethical Decision Making Framework (attached) to assist in making the decision.

7) Only send emails of which the content could be displayed on a public notice board. If emails cannot be displayed publicly in their current state, consider rephrasing them, using other means of communication, or protecting information by using a password.

8) Subscription to electronic services or other contracts on behalf of CLAN is prohibited unless you have the express authority from the Executive Committee to do so.

9) If you receive any offensive, unpleasant, harassing or intimidating messages via email or intranet you are requested to inform a member of the Executive Committee immediately for a determination on how to respond/react.

10) A hard copy of any important or potentially contentious communication, which you have received via email should be printed and filed appropriately.

11) Where important to do so obtain confirmation that the recipient has received the email.

12) Documents prepared by CLAN for clients, partners or project leads etc may be attached via the email however take care to ensure that the recipients are correct and permitted to receive the email and attached documents.

13) Users must spell check all mails prior to transmission.

14) CLAN reserves and intends to exercise the right to review, audit, intercept, access and disclose all messages created, received or sent over the electronic mail system for any purpose. Notwithstanding the CLAN's right to retrieve and read any electronic mail messages, such messages should be treated as confidential by other employees and accessed only by the intended recipient.

15) Employees are not authorised to retrieve or read any email messages that are not sent to them. Any exception to this policy must receive prior approval from a member of the

Executive Committee. However, the confidentiality of any message should not be assumed. Even when a message is erased it is still possible to retrieve and read that message.

14. Publications

This section of the policy refers to publications such as the CLAN annual report, CLAN newsletters, and academic or professional and peer reviewed publications.

CLAN's annual report is a document that is provided annually disseminated via the CLAN website and describes CLAN's operations and financial conditions. The front part of the report contains a combination of graphics, photos, and an accompanying narrative, all of which chronicle CLAN's activities over the past year and may also make forecasts about the future. The back part of the report contains detailed and audited financial information.

CLAN's annual reports have been delivered in a particular format that, while it has been used over time, is flexible to allow for improvement in the delivery of content and the style of presentation. Changes to the format and style are to be approved by the Executive Committee. Content for the annual report is collated across the reporting year.

CLAN's newsletter is generally provided on a quarterly basis and follows the same style guide as social media publications. The newsletter can be disseminated wholly via the CLAN website and email to CLAN members and Stakeholders and in part (short or abbreviated stories) through social media outlets. Content for the newsletter is collated across each quarter and is approved by the Executive Committee.

Typically CLAN's annual report and newsletter content involves telling a story with images in support of the written content. In these cases use the Ethical Decision Making Framework (attached) to help make decisions about how to present the story and the images. This is particularly necessary if there is doubt about content or images specially when the story and images relate to children and young people.

CLAN occasionally leads or participates in writing an academic paper or the preparation of professionally and peer reviewed documents. An example of a document CLAN has led the development of are the Child Friendly Rights Flyers. These rights flyers can be translated into other languages. In these cases, CLAN follows strict processes to ensure accuracy including use of native speaking subject matter experts with approval of final versions by lead partners in country. Rights flyers have a proven style and this is to be adhered to unless changes are made by the Executive Committee.

15. Website

The CLAN website is a publicly accessible website providing information and news about CLAN's activities. It enables on-line access to a large amount of information that CLAN has made publicly available.

CLAN's identity is important and as a communication tool of CLAN as such the website needs to express our values clearly. The structure of the site and how the user navigates it is of paramount importance so the organisation of the site should be made easy for the user. Good design is also essential to ensure that the material contained on the website is accessible to all. The content must be kept up to date. Out of date information will be

removed or updated by the System Administrators and the originating author will be informed.

Typically CLAN's annual report and newsletter content involves telling a story with images in support of the written content. In these cases use the Ethical Decision Making Framework (attached) to help make decisions about how to present the story and the images. This is particularly necessary if there is doubt about content or images specially when the story and images relate to children and young people.

CLAN's website is primarily a communication tool that will be viewed by its target audience. It is therefore essential that a professional image is portrayed. To ensure that the website maintains a consistent standard, content is approved by the Executive Committee prior to uploading. A master design has been created for the website and any change to this design standard must be approved by the Executive Committee. This master design includes CLAN's name, logo, colours and the menus and forms part of CLAN's corporate image.

System Administrator access is given to only those who have the authority and skill to add and delete and update the website and they are accountable to the Executive Committee. Day to day management of the website is under the direct supervision of the President and Vice President of CLAN. Google analytics is used to assess usage to adjust content and layout.

The following actions are not permitted on CLAN's website:

- Publishing of any information that identifies a child, young person or adult family member that will identify the child in any format unless express permission is given
- Publishing any information that results in harm to a child, young person or adult or to the environment
- Publishing any information that is defamatory in nature
- Publishing confidential or private information
- Publish any information that contains bad language, is offensive, vulgar, racist, sexist or libellous
- Linking pages to inappropriate internet sites. Links to internet pages from the intranet site should carry a warning that only those with internet access can get to the destination
- Publish any information that brings CLAN into disrepute
- Publish non-CLAN related material
- No other website is to established or maintain on a separate internet site purporting to represent CLAN.

16. Monitoring and Reporting

The Committee will monitor the risks and use of all forms of communication, in particular, social media that may impact positively and/or negatively on CLAN's reputation and activities. Management decisions will be made to support or to remedy social media activities.

17. Breach of Policy

Employees and volunteers who engage in communication deemed not be in the best interest of CLAN are in breach of CLAN's relevant policies and legislation are subject to determinations made by CLAN's Executive Committee.

18. Policy review

CLAN will undertake reviews of this policy and the Ethical Decision Making Framework bi-annually.

19. Associated CLAN documents

- Code of Ethics and Professional Conduct Policy
- Complaint Management Policy
- Workplace Health and Safety Policy

20. References

- NSW Law Society, Guidelines on Social Media Policies 2012
- Workplace Health and Safety Act 2011 (NSW)
- Workplace Health and Safety Regulation 2011 (NSW) Social Media.
- ACFID Ethical Decision Making Framework for Communications

CLAN Ethical Decision Making Framework in Communications (EDMF)

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1. Introduction

At CLAN, we aim to empower the communities we work with through our storytelling and communications content. We strive to empower and protect the people who share their stories with us. We are committed to depicting people and contexts authentically and truthfully. We value the importance of self-determination and are committed to working with all stakeholders in a way that upholds their dignity and respects their values, history, religion, language and culture.

Our vision is to improve the quality of life of for children living with chronic health conditions in resource-poor settings so they may enjoy healthy and happy lives. We bring this vision to life by carefully protecting those who share their stories with us, and amplifying the benefits of sharing stories with our supporters and the general public.

CLAN is a not-for-profit entity that takes a rights based, grassroots community development model that provides a strategic framework for action based on our five Pillars. As part of our work, we share some important – yet difficult – stories. Sometimes our stories will show injustice and harsh realities. We, and the people we work with, know these are important stories for the world to hear. However, inherent in undertaking these activities is a level of risk in relation to sharing these stories.

CLAN acknowledges it can be difficult to put our values into practice when sharing stories – especially stories dealing with trauma and injustice. We can face conflicting demands when collecting and sharing stories, and we acknowledge it's sometimes challenging to know exactly what 'dignity' and 'empowerment' mean in different cultural contexts. We also acknowledge that unconscious bias plays a huge part in decision-making – however, by its very nature, it is difficult to address and mitigate the risks that it causes.

Misunderstanding cultural norms and mismanaging storytelling content can harm both the people we strive to support, as well as our organisation. For example, children may be targeted by people seeking to abuse them. The personal reputation and confidence of people who've shared their stories may be damaged if their stories are misused and they may face retribution from their community. CLAN may suffer damage to our brand and reputation if we publish insensitive materials. These are just a few of the potential risks.

This EDMF is one element in a suite of tools to reduce these risks, as far as possible. We seek to prevent harm from occurring and this EDMF is a proactive means of mitigating those risks and supporting ethical decisions about our communities.

2. Purpose

This EDMF aims to ensure our communications content is of the highest ethical standard. This means all stakeholders are respected and protected, and trust in our organisational is maintained. The EDMF aims to ensure our organisation is using best-practice communications methods that minimise the risks related to storytelling and publishing.

3. Scope

This EDMF must be followed by everyone who collects and publishes stories at CLAN, including all staff, volunteers, partners, staff and governing body members. It includes our offices in Australia and in other countries where we work. The EDMF applies to all visitors to our programs, and contractors and consultants such as freelance writers, designers, multimedia producers, fundraising consultants, partner organisations and other external parties using our stories, images, name or logo.

Images and messages developed for the purpose of fundraising must have free, prior and informed consent of the person/s portrayed including children, their parents or guardians.

4. Our values

Everything our organisation does is built on our values. For our foundations to remain strong and for our actions to be ethical, we must continue to look to our values in our everyday work.

Ethical principles relating to the treatment of human beings are codified in a number of widely- accepted documents, such as the *Nuremberg Code* (1947), the United Nations' *Declaration of Human Rights* (1948), the *Declaration of Helsinki* (1964), the *Belmont Report* (1979), and the United Nations' *Convention on the Elimination of All Forms of Discrimination Against Women* (1979), *Convention on the Rights of the Child* (1989), *Convention on the Rights of Persons with Disabilities* (2007) and *Declaration of the Rights of Indigenous People* (2007).

At their core, these policies include the fundamental rights of human dignity, autonomy, protection, safety, maximisation of benefits and minimisation of harms. While originally stemming from biomedical and human rights contexts, these principles have been adapted beyond these early contexts and rise above disciplines and methodologies. We accept them as basic to any endeavour relating to storytelling ethics and they are explored in our EDMF.

CLAN's values underpin our approach to storytelling and help us to be honest and respectful of people's dignity and right to privacy. Our values ensure our communications are empathetic to story subject matter and importantly in being truthful and respectful do not over emotionalise, extrapolate the facts: CLAN's values are:

- Honesty – CLAN acts honestly and truthfully so that public trust is protected and donors and beneficiaries are not misled
- Respect - CLAN acts with respect for the dignity of our organisation and with respect for the dignity of donors and beneficiaries
- Integrity – CLAN acts openly and with regard to our responsibility for public trust. We disclose all actual or potential conflicts of interest and avoid any appearance of ethical or professional misconduct

- Empathy – CLAN works in a way that promotes our purpose and encourages others to use the same professional standards sand engagement. CLAN values individual privacy, freedom of choice and diversity in all its forms
- Transparency – CLAN reports transparently about the work we do the way donations are managed and disbursed and cost and expenses in an accurate and clear manner.

CLAN's values are aligned with the Australian Council for International Development's Code of Conduct of which we are a full signatory and our EDMF is connected to other CLAN policies contained within the On-line Handbook, including:

- Communications Policy & Ethical Decision Making Framework in Communications
- Child Protection and Safeguarding Policy
- Privacy Policy
- Risk Management Policy
- Disability Inclusiveness Policy
- Gender Equality Policy
- Code of Ethics and Professional Conduct.

5. Making ethical decisions

CLAN's EDMF for Communications explains how to make ethical decisions when creating and publishing communications content. It uses a framework of structured discussions at ethically important moments during the storytelling process, with the aim of creating focused discussions that improve practice. It also aims to reduce risks associated with storytelling and protect contributors.

Ethical decisions can be very complex. When a situation has no clear 'right and wrong' answer, decision making can be difficult. Even more difficult is making ethical decisions when affected by unconscious biases. And everyone holds unconscious biases.

More than one set of cultural norms and organisational values can equally apply to an issue, even if those norms and values are conflicting. This makes decisions difficult, as individuals and teams are forced to choose.

This EDMF sets out important questions and explains when these questions ought to be asked throughout the storytelling process. It also explains who is responsible for having these discussions and what to do if a decision can't be made.

Ambiguity and uncertainty are part of any ethical decision-making framework, and we encourage exploration of ethically grey areas. Indeed, this exploration is the most important part of the process. Our discussions help us to reach further outward, toward a fuller understanding of our contributors' lives and contexts – and also of our own unconscious biases, norms and ways of working.

6. Risk Assessment

In developing this EDMF, CLAN has considered the risks associated with all its communications activities and how they might impact. Using the below matrix identify the likelihood and consequence of any known or potential risk to the proposed communication to determine the risk rating to assist devising management action/mitigation strategies to be implemented to reduce the chance of the risk being realised.

Likelihood (eg. Possible) is the chance that something might happen and can be defined, determined, or measured objectively or subjectively and can be expressed either qualitatively or quantitatively.

Consequence (egMinor) is the outcome of an event and has an effect on objectives. The risk rating or level of risk is the point on the matrix at which the likelihood and consequences meet (eg. Medium). Determine the rate/level of risk to the project outcomes for each of the identified risks occurring with the controls in place, then, determine whether the risk is acceptable in that it will not impact substantially on the communication going forward. Should the risk be unacceptable, reconsider mitigation strategies so that the risk is acceptable. If this is not possible then consider if the project can go forward or not carrying this risk. Complete the Risk Register below.

CLAN Communication Risk Management Register

Likelihood	Insignificant consequences	Minor consequences	Moderate consequences	Major consequences	Catastrophic consequences
Almost certain	Medium	High	High	Extreme	Extreme
Likely	Medium	Medium	High	Extreme	Extreme
possible	Low	Medium	Medium	High	Extreme
Unlikely	Low	Low	Medium	High	High
rare	Low	Low	Low	Medium	High

Key: L = Likelihood, C = Consequences, A = Acceptable, NA = Not acceptable

No	Risk	Impact	L	C	Rating	A or NA	Management Action/Mitigation Strategy	Person responsible
1	Community in which we work							
2	Contributors/donors							
3	Staff, volunteers, contractors etc							
4	Governing body							
5	Partners							
6	Supporter and the general public							
7	CLAN's activities							
8	CLAN's reputation and the reputation of ACFID and other associated organisations							
9	Other							

Complete this risk assessment for each storytelling project.

This EDMF will be used to guide decision-making across the organisation to help mitigate some of the risks mentioned above. It will be shared with partners who are involved in sourcing content for our communications materials, and training will be supplied where appropriate.

See the CLAN Communications log which includes the level of risk log. The Log is updated and reported on as a standing agenda item of CLAN Association meetings.

7. Who is involved in the ethical decision making process

While all staff, volunteers and members are responsible for ensuring our communications are ethical, lawful and protect contributors and some staff members will need to be involved in specific conversations as part of our EDMF. The staff involved in EDMF discussions are:

- **Content gatherers -** President, Vice President, Committee Members, Partners, Community Development Officers, Community Leaders, Youth Advisors - Outreach, Projects and Governance, Communications Officer and Marketing Officer
- **Programs -** Project Leads, Community Development Officers, Community Leaders, Youth Advisor - Outreach
- **Child safeguarding -** All CLAN personnel.
- **Marketing -** President, Vice President, Committee members, Communications Officer and Marketing Officer.

8. Ethically Important Moments

While all ethical issues should be considered throughout the storytelling process, there are times when certain issues are more important. Below are seven 'ethically important' moments during the storytelling and publishing process, accompanied by key issues to discuss at those times and who's responsible for the discussions.

No	Ethically important moment	When to discuss	Issues to discuss	Who to discuss
1	When scoping a story	•Developing a storytelling concept •Scoping story leads •Writing a Terms of Reference	•Connection to values • Protection	• Content gatherers • Programs • Child safeguarding • Marketing
2	When planning to gather content	•Planning a content- gathering trip •Planning a phone/email/video interview •Sourcing content directly from program staff and contributors	•Informed consent •Fuzzy boundaries (a context analysis is helpful at this point) • Protection • Privacy	• Content gatherers • Programs • Child safeguarding
3	While gathering content	•While on a content- gathering trip •While conducting an interview	•Informed consent •Fuzzy boundaries • Protection •Connection to values • Privacy •Authorship and ownership	• Content gatherers • Programs • Child safeguarding

4	Directly after gathering content	•Directly after gathering content from the field or via an interview	•Informed consent •Fuzzy boundaries • Protection	• Content gatherers • Programs • Child safeguarding
5	While creating the storytelling content	•While creating materials to publish, such as writing a story, editing videos/photos, and writing social media content	•Connection to values •Authorship and ownership • Fuzzy boundaries • Privacy	• Content gatherers • Programs • Marketing
6	When publishing a story	•When publishing content on social media and via the website, print (such as DMs) and the news media	•Connection to values •Fuzzy boundaries (a context analysis is helpful at this point) •Informed consent • Protection • Privacy •Authorship and ownership	• Marketing • Content gatherers • Child safeguarding
7	After publishing a story	•Once a story is in the public domain	•Informed consent •Fuzzy boundaries •Authorship and ownership	• Programs • Content gatherers • Marketing

9. Key ethical issues

There are six key ethical issues that are relevant for our storytelling and publishing process. A few golden rules to keep in mind are:

- If I share this story, will this person be safe?
- If I share this story, will this person be empowered?
- If I share this story, will this person feel respected – by themselves and others?

Below are some questions to help us reflect on the key ethical issues and discuss them as part of the decision-making process. Some of these questions may be easy to answer. Others might not have a clear answer and are best considered in conversations with others, as outlined above.

9.1 Connection to values

Everything CLAN does is built on our values. We must continue to look to our values in our everyday work so our foundations remain strong and our actions are ethical. Our discussions should ask:

Topic	Question	Y/N or N/A
	Have we put the best interests of the contributor first?	

Human rights	Have we treated the contributor with dignity and fairness?	
	Have we respected the personal freedom and privacy of the contributor?	
	Have we respected the personal freedom and privacy of the contributor?	
	Have we given the contributor control over how their identity and thoughts are portrayed in their story?	
	Have we ensured the content is accurate?	
Children's rights	Have we encouraged the contributor to freely express their thoughts and feelings?	
	Have we ensured the best interest of children have been put before the interests of adults and our organisation?	
	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?	
Indigenous rights	Have we respected Indigenous people's rights to dignity and fairness?	
	Have we given Indigenous people the ability to freely express themselves, through their own culture and language?	
	Have we considered how racism has affected this story?	
	Have we carefully considered how Indigenous people are portrayed?	
	Have we given Indigenous people control over how their identity and thoughts are portrayed in this story?	
Comments		

9.2 Protection

CLAN puts the wellbeing of its stakeholders first. We explain how we protect our stakeholders in our Child Protection and Safeguarding Policy, Communications Policy Image, Privacy Policy and Risk Management Policy. All staff and stakeholders must uphold these policies. There are no exceptions. However, there are also context-related issues that arise in relation to protection. Our discussions should ask:

Topic	Question	Y/N or N/A
Protection of life	Could the contributor's life be at risk by sharing their story?	
	Do we know enough about the contributor's history to make a confident assessment of their safety?	

Protection of health	Could the contributor's health be put at risk by sharing this story?	
	Could the contributor risk being cut off form important services by sharing this story?	
Protection of dignity	Could we be putting the contributor or their community at risk of vilification or retribution by sharing their story?	
	Have we considered how the contributor's family, friends and community might fell about the storytelling project?	
Comments		

9.3 Informed consent

CLAN's informed consent is clearly defined in the CLAN Communications Policy and the CLAN Privacy Policy. All staff and stakeholders must follow this process. There are no exceptions. However, there are also context-specific issues that arise in relation to informed consent. Our discussions should ask:

Topic	Question	Y/N or N/A
Correct information	Have we provided all of the necessary information to the contributor so they can decide whether to consent to participate?	
	Have we shown the contributor appropriate examples of how their story might be used (including where it may be published and who might see it)?	
	Have we explained different ways the contributor's identity can be revealed and concealed?	
	Have we consulted with the right people (including children's guardians and community elders)?	
Clear comprehension	Does the contributor fully understand the risks and opportunities associated with sharing and publishing their image and story with our organisation?	
	Have we given the contributor enough advance notice about the project so they have time to consider the risks and opportunities?	
	Have we explained the storytelling process in a way the contributor fully understands (including children), using the best-possible language?	
	Is there a single point of contact for the contributor to discuss the project and any consent issues? Is it easy for the contributor to discuss the project with us?	
Voluntary consent	Is there are power imbalance between the contributor and the CLAN?	
	If there is a power imbalance, can you describe it?	
	If there is a power imbalance, how can you reduce it?	
	Is there an element of duress in the contributor's consent?	
	If there is an element of duress, how can we address it?	
	How can we ensure the contributor can say 'no' to being involved in the storytelling project?	
	How can we ensure the contributor can withdraw their consent at any time?	

Comments	

9.4 Privacy

CLAN values and upholds the privacy of their contributors. All staff, governing body members, partners and volunteers must abide by our Privacy Policy. However, there are also context-related issues that arise in relation to privacy. Our discussions should ask:

Topic	Question	Y/N or N/A
Protection	Have we adequately protected the privacy of the contributor?	
	Have we discussed how the contributor's story may expose them to the public?	
	If appropriate, have we adequately concealed the name, location and visual identity of the contributor?	
Information storage	Have we safely and securely stored the contributor's personal information?	
	Does the contributor understand how their personal information is stored and used?	
Access to information	Who has access to the contributor's information and are they aware of who can access it?	
	Have we explained how the contributor can access their personal information, make amendments to their story and withdraw consent?	
Comments		

9.5 Authorship and ownership

CLAN respects the right of contributors to control their stories. We respect the right of contracted writers and photographers to moral ownership of their works. We acknowledge that ownership and 'control' of stories can raise difficult ethical questions. While we always abide by our [Privacy Policy], there are some discussions that can help us understand our responsibilities regarding authorship. Our discussions should ask:

Topic	Question	Y/N or N/A
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?	
	Are there any conflicting copyright claims for storytelling materials we've published (or seek to publish)?	
	How do we ensure contributors and content creators understand their legal rights?	
Comments		

9.6 Fuzzy boundaries

CLAN understands the storytelling process is built on relationships, and sometimes the network of relationships is complex. We acknowledge that relational boundaries between contributors, content collectors, program staff and others can become blurred. In addition, the stories they create may be

used to serve multiple purposes, such as fundraising, advocacy, and community engagement. This blurring of roles and purposes is referred to as 'fuzzy boundaries'. CLAN acknowledges there is the potential for the content-collector role to become blurred in storytelling processes that involve building rapport with contributors. We also acknowledge that this potential is intensified in storytelling projects where content collectors spend significant periods of time engaged in fieldwork. Our discussions should ask:

Topic	Question	Y/N or N/A
Content creator responsibilities	How should we develop a relationship with the contributor?	
	Should we explore how our unconscious biases affects this projects? How might we change the storytelling process as a result of exploring our unconscious biases?	
	What are the moral responsibilities that fall directly on the content collector?	
Other people's responsibilities	What are the different roles involved in the storytelling project?	
	Does everyone in the project understand their role and other's expectations of them?	
	How do different people involved in the project see the purposes of the storytelling project? If there are different perspectives, how do we manage conflicts?	
Blurred boundaries	How do we respect the personal relationships (and possible friendships) developed during the project?	
	How do we respond to any blurred roles and relationships during the course of the project?	
	What impacts do blurred roles have on the ethical conduct of the project?	
	Can content collectors, contributor's or others become personally over-invested?	
Comments		

10. Who to talk to if still unsure

Making decisions about some of these issues can be difficult. There may be times when you or your team are still unsure whether an image, story or information should be used even after discussing the key issues and reviewing other policies and guidelines. If you have discussed the questions outlined above and need more information to make a decision: Contact the CLAN's President or Vice President, or Communications or Marketing Officers. The final decision on all communications materials lies with the President of CLAN.

11. Definitions

Content gatherer	Someone who documents a contributor's story via photographs, videos, oral interviews and written testimony.
Content	What stories are made of. Content can include copy, images, sound, video and data.
Contributor	Someone who shares their storytelling content with an organisation that intends to publish their content. In the context of not-for-profit organisations, contributors are usually program participants, staff, volunteers and members.
Copy	Written words and numbers
Cultrural norms	Informal understandings of group conduct that govern the behaviour of members of a society.
Dignity	The feeling of having decision-making power, freedom and autonomy over life choices, together with the feeling of self-worth and self-confidence, and feeling that one has the respect of others.
Empowerment	Authority or power given to someone to do something.
Ethical decision-making framework	A structured series of questions and issues for consideration that help people make choices when they are faced with situations that require value judgements.
Ethical dilemma	A situation that has no clear right or wrong answer.
Images	Two-dimensional visual representations. Images include 'still' images such as photographs, artworks and illustrations, and 'moving' images such as videos, animations and GIFs.
Informed consent	When a contributor grants permission to publish their story with full knowledge of the possible consequences, including possible risks and benefits. Informed consent must be granted without duress.
Privacy	A person's right to control access to their information and identity.
Publisher	A person or organisation that publishes stories using methods such as print, websites, social media, press releases etc.
Respect	Due regard for the feelings, wishes or rights of others
Story	A story can include written, visual, verbal and data elements. These elements can exist alone or in a combination with other story elements.
Storytelling	The act of sharing stories.
Unconscious bias	A bias we are unaware of, and which happens outside of our control. It is a bias that happens automatically and is triggered by our brain making quick judgments and assessments of people and situations. It is influenced by our cultural environment and personal experiences.
Vicarious trauma	The inner transformation that occurs in the inner experience of the therapist [or other professional] that comes about as a result of empathic engagement with clients' trauma material. (Pearlman and Saakvitne, 1995)