

# Communication & Transparency Policy

## Global

Policy Owner: Executive Director of Public Affairs

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### 1. PURPOSE

- 1.1 The Fred Hollows Foundation (**The Foundation**) is committed to ensuring its communications are clear, concise and accurate and respect the dignity and rights of our beneficiaries. Our communications provide our supporters, including donors, partners and beneficiaries with tangible examples of our sight-restoring work. We share information for fundraising, to strengthen and maintain our partnerships, to maintain transparency in our activities, and for engaging with and reporting to supporters, and also for media and advocacy work.
- 1.2 Fred Hollows was an open, honest person who believed in a direct approach and we seek to follow in his footsteps. The Foundation believes our stakeholders, donors and beneficiaries have the right to know what we are aiming to do, how we operate and work and whether our resources are being used effectively to deliver our vision in a manner consistent with our values.

### 2. DEFINITIONS

**Communication Materials** – Any material used to convey stories and examples about the work of The Foundation to audiences including the public, supporters including donors, partners, beneficiaries and the media, which could include case studies, presentations, reports, publications, video, images, quotes and messages conveyed by any means including social media or website.

**Personnel** - A person who carries out work in any capacity for The Foundation which includes paid employees, Board Directors, contractors, sub-contractors, consultants, work experience students or volunteers.

### 3. BACKGROUND

- 3.1 Communication and information sharing is the bedrock of transparency and partnership, and the key to effective communication is impact. The Foundation's strongest branding tool is the strategic and consistent use of key images, messages and documented quotes from Fred himself. The Foundation's communications reflect Fred's persona by being bold, direct, accurate and inspiring. Our tone of voice should be clear, concise, engaging, direct and informative.
- 3.2 Communication Materials provide our supporters and partners with tangible examples of our sight-restoring work. They are used for fundraising, engaging with and reporting to supporters on the results of our programs and advocacy work to demonstrate our effectiveness. They are also used to share lessons learnt and emerging evidence relating to effective programming, and to fulfil our responsibility to ensure our stakeholders and beneficiaries are well informed and engaged in our work.

3.3 All communication by The Foundation, including Communication Materials, must abide by the following guiding principles.

## **4. GUIDING PRINCIPLES**

### **4.1 General Principles**

4.1.1 All communications activities will adhere to The Foundation's policies and guidelines (including the Child Protection Policy), the Australian Council for International Development (ACFID) Code of Conduct and Fundraising Charter, the Fundraising Institute Australia (FIA) Code, Australian Government Department of Foreign Affairs and Trade (DFAT) Guidelines and Australian NGO Co-operation Program (ANCP) Manual. The Foundation will also abide by the communications commitments set out in agreements or contracts with institutional funders including the UK The Foreign, Commonwealth & Development Office (FCDO), the United States Agency for International Development (USAID) and other donors.

4.1.2 The Foundation will at all times communicate truthfully, transparently, ethically and in an accessible manner. Communication Materials must:

- (a) be obtained and used according to ethical principles following the ACFID Code of Conduct;
- (b) when possible, comply with Web Content Accessibility Guidelines (WACG) 2.0 Accessibility Standards (Level AA), where relevant
- (c) be consistent with their stated purpose and The Foundation's values;
- (d) accurately describe the nature and scope of The Foundation's work;
- (e) acknowledge the role of partners and donors; and
- (f) must be approved by the Director of Brand and Communications or otherwise in accordance with relevant procedures.

4.1.3 All Communications Materials and other communication carried out for the purposes of soliciting funds must:

- (a) accurately represent the context, situation, proposed solutions and intended meaning of information provided by affected people;
- (b) clearly state if there is a specific purpose of each donation;
- (c) avoid material omissions, exaggerations, misleading visual portrayals and overstating the need or what the donor's response may achieve; and
- (d) include The Foundation's identity including name, address, Australian Business Number and purpose.

4.1.4 The Foundation values transparency in its work and will operate with openness, honesty and accountability. The Foundation will make available and share appropriate information such as how we use donated funds, our financial statements and reports, with stakeholders including donors. The Foundation believes our supporters and beneficiaries have the right to know, subject to protecting privacy and confidentiality as appropriate, what we are aiming to do, how we operate and work and whether our resources are being used effectively. To facilitate this we maintain effective systems to capture, document and disseminate results, good practices and lessons learnt.

4.1.5 The Foundation's approach to obtaining and disseminating Communication Materials is to treat beneficiaries and partners consistently with respect and dignity.

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#### References

- 4.1.6 The Foundation's communication and fundraising activities must be conducted ethically and undertaken in accordance with the legislation and regulations of the relevant jurisdiction.
- 4.1.7 The Foundation recognises the importance of acknowledging and recognising our donors and providing positive exposure for their philanthropy. We acknowledge the value and importance of stewardship and our donors who invite further contributions to our work.
- 4.1.8 The Foundation recognises the importance of protecting the personal information of our beneficiaries and donors.
- 4.1.9 The Foundation's communications will always show respect for other ACFID members and not seek to disparage their work.

## **4.2 Collection and use of data, stories and/or images**

- 4.2.1 When working with beneficiaries of assistance from The Foundation, it is important to explain the purpose of collecting photographs and personal information and ensure that informed consent is obtained and recorded at all times in accordance with the relevant procedures.
- 4.2.2 Individuals selected as subjects of stories and/or images have rights, including the right to say 'no', the right to consent to the use of images, footage or other materials in which they are portrayed, and the right to withdraw that consent at any time.
- 4.2.3 All Personnel involved in the collection of photos or case studies of children must ensure that informed consent is obtained from the child and his/her parent or guardian before taking and using a child's photo in any Foundation materials. Personnel should also refer to the Child Protection Policy and all procedures relating to The Foundation's Photo Library PhotoShelter for further information.
- 4.2.4 The collection and use of information for a story, project or program should be done such that it will not be used in a way that is detrimental to the people from whom the information is collected. Any personal information, including the consent information, must only be used and disclosed for the purpose provided.
- 4.2.5 All Personnel are encouraged to be aware of and challenge their own preconceptions, prejudices, stereotyped beliefs and attitudes towards any individual or group whilst obtaining data, stories or images for Communications Materials.
- 4.2.6 Photos and footage used in The Foundation's Communications Materials should respect the dignity, values, history, religion and culture of people, consistent with principles of basic human rights and the ACFID Code of Conduct. All photos should be honest representations of context and the facts and should not be used in a misleading way.

## **4.3 Representing The Foundation: Media, Ambassadors and Champions**

- 4.3.1 Only the Chair, CEO, Director of Brand and Communications and Gabi Hollows may speak on behalf of The Foundation. Other senior Personnel may from time to time speak on behalf of The Foundation, but only with prior approval from the Chair, CEO or Director of Brand and Communication.
- 4.3.2 All interactions with any media must be conducted in accordance with the Media Relations Procedure including obtaining appropriate approvals.
- 4.3.3 The Policy Owner is responsible for all social media activity of The Foundation and will ensure that all actions in the use of social media are responsive, engaging and respectful.

4.3.4 All Personnel and other representatives of The Foundation must take responsibility for what they publish when using social media, exercise good judgment and common sense and not purport to speak on behalf of The Foundation nor bring The Foundation into disrepute. Material published on social media may be as public as if the comments were made in the media or at a public event. For example, if something ought not be said to a media representative, it similarly should not be published on social media. Personnel are accountable for what they communicate. The Foundation does not condone use of social media by Personnel based in jurisdictions where it is unlawful.

4.3.5 Ambassadors and Champions of The Foundation make meaningful contributions to our general work, including a particular country, program or activity. All Ambassadors and Champions should have values that align with those of The Foundation. Permission of the Chair of the Board must be obtained before discussions commence with a potential Ambassador. Selection of Ambassadors and Champions will be in accordance with the Ambassadors and Champions Procedure, including that the Board will have the ability to confirm appointments of Ambassadors at each Board meeting and review appointments at least every three years.

#### **4.4 Indigenous people and communities**

4.4.1 The Foundation understands that the cultural and socio-economic background and experience of indigenous people and communities are unique. Indigenous people have the right to have their voice and perspective heard and understood clearly.

4.4.2 Indigenous persons, including Aboriginal and Torres Strait Islander communities, traditional landowners and custodians and individuals have a right to say 'no' to any proposals put to them and their decision should be respected.

4.4.3 Indigenous people have the right to make agreements about and to control the use of images and footage of individuals, places, events and ceremonies which are the subject of those agreements.

### **5. COMMITMENTS UNDER THIS POLICY**

5.1 The Foundation is committed to ensuring all of its communications uphold this Policy by:

5.1.1 Implementing all necessary procedures and guidelines to support this Policy.

5.1.2 Managing the use of all Communication Materials including images and stories.

5.1.3 Maintaining effective systems to capture, document and disseminate results, good practices and lessons learnt.

5.1.4 Promoting the principles contained in this Policy to both The Foundation's Personnel, partners and others working with The Foundation.

5.1.5 Taking all reasonable steps to ensure personal information is stored in a secure environment in accordance with our Privacy Policy.

5.1.6 Providing ongoing training to Personnel who regularly collect the stories of our beneficiaries and providing guidelines and training materials for other Personnel and partners who may from time to time collect stories, data and images.

5.1.7 Encouraging all Personnel to ensure our communications are open, truthful and transparent.

5.1.8 Educating, training and empowering Personnel to understand the importance of communications and transparency and the rights of our beneficiaries.

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#### References

- 5.1.9 Creating a culture that supports open and honest communications across The Foundation.
- 5.1.10 Providing leadership and clear roles and responsibilities with regards to all Communications Materials and image collection.
- 5.1.11 Respecting that indigenous persons and communities, including Aboriginal and Torres Strait Islanders, have a right to say 'no' to any proposals put to them.
- 5.1.12 Implementing systems to ensure all Communication Materials including images and stories meet the requirements set out in this Policy, with a particular focus on the protection of children and vulnerable people and respecting the dignity of our beneficiaries.

## **6. RESPONSIBILITIES & ACCOUNTABILITIES**

### **6.1 Chief Executive Officer**

- 6.1.1 The CEO is responsible for ensuring this Policy is upheld and will inform the Board of The Foundation of any concerns relating to communications or transparency that may present risk to The Foundation, its Personnel, beneficiaries, partners, reputation, operations or other activities, in particular concerns regarding the safeguarding of children and vulnerable people.
- 6.1.2 The CEO will hold relevant Executive Directors accountable to this Policy.

### **6.2 Executive Directors**

- 6.2.1 The Business Operations Executive Director will promote the existence of this Policy to all Personnel.
- 6.2.2 Executive Directors will ensure Foundation and Divisional procedures, practices, plans and operations align with this Policy and that all relevant Personnel are aware of this Policy and their responsibilities under it.
- 6.2.3 Divisions are encouraged to put in place procedures to implement the principles set out in this Policy; including for specific countries. However, this Policy will prevail to the extent of any ambiguity or inconsistency between this Policy and those procedures.
- 6.2.4 Executive Directors are responsible for monitoring and responding to any communications risk or concerns arising within The Foundation's business activities. The Executive Director of Public Affairs will include risks and incidents on the Divisional risk register and seek the advice of the Policy Owner on issues of contention.

### **6.3 Policy Owner**

- 6.3.1 The Policy Owner is responsible to ensure the Policy complies with The Foundation's obligations and contemporary practice and will update this Policy as required.
- 6.3.2 The Policy Owner will be responsible for addressing any issues arising in relation to this Policy and will be or arrange a point of contact for all Personnel for any issue of contention.
- 6.3.3 The Policy Owner will inform the CEO of any key risk to The Foundation regarding communications and transparency and will ensure risks and incidents are recorded on the organisational risk register.

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## **6.4 Managers (Country and People Managers)**

- 6.4.1 Managers will demonstrate a commitment to ensuring all Communication Materials meet the guiding principles within this Policy and model practices of open and honest communications.
- 6.4.2 Managers are to communicate this Policy and all related procedures to Personnel regularly and to ensure all Communication Materials are approved in line with the procedures.
- 6.4.3 Managers will engage with their teams in an open, honest and meaningful way to ensure they are aware of what is expected of them and regularly review Communication Materials to ensure they comply.
- 6.4.4 Managers will constructively participate in the resolution of any communications or transparency issues.

## **6.5 All Personnel**

- 6.5.1 All Personnel will adhere to the principles and commitments under this Policy and any related procedures and will take all reasonable care to ensure that their actions are not in breach of this Policy nor directly or indirectly encourage others to breach this Policy.
- 6.5.2 All Personnel are responsible for identifying and responding to any communications-based risk or concerns arising within The Foundation's business activities. Any matters of contention must be reported to the Policy Owner.

## **6.6 All associated stakeholders**

All associated stakeholders operating with or on behalf of The Foundation are responsible to understand and abide by the principles and relevant commitments under this Policy and to advise the primary contact point within The Foundation of any issues that may arise.

## **7. MONITORING**

- 7.1 A report on the implementation of this Policy will be submitted to the Board no less than every three years across The Foundation's business activities, including the countries in which we work. The Policy Owner is responsible for compiling this report and submission to the CEO.
- 7.2 This Policy will be reviewed every three years and the Policy Owner is responsible to undertake this review.
- 7.3 The Business Operations Division has oversight for all Governance and Operational Policy and will ensure the Policy is listed on the Policy Register and provide support to Policy Owner to ensure monitoring and reporting obligations are met.

## CONTROL OF DOCUMENTATION

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<b>Related Policies</b>	ORG-003 Safeguarding People Policy; ORG-010 Speak-Up Policy; ORG-021 Privacy Policy; ORG-057 Environmental Sustainability Policy; ORG-072 Human Rights Equity & Inclusion Policy		

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### References