

## Ethical Decision Making Framework for Communications

### 1. What is an Ethical Decision Making Framework for Communications?

An Ethical Decision Making Framework (EDMF) for communications is a tool to help our organisation make ethical decisions when creating and publishing communications content. It is designed to be used in ethically 'grey areas' where it is not clear if an image or story should be used.

This EDMF uses a framework of structured discussions at important moments during the storytelling process. It outlines key issues to be considered, when discussions should happen, who should be involved and what personnel should do if they are unable to make a decision.

### 2. Scope

This EDMF is to be followed by everyone who collects and publishes stories at SeeBeyondBorders. That includes all staff, volunteers and governing body members in Cambodia, Australia, the UK and Ireland. The EDMF applies to visitors to our programs and any contractors and consultants who we use. It also applies to other external parties who wish to use our stories, images, name or logo.

### 3. Background

At SeeBeyondBorders our values and communications principles underpin our approach to storytelling. They are outlined in our Communications Policy. Our values are aligned with the [Australian Council for International Development's Code of Conduct](#). In preparing this document a range of external sources were reviewed. These include the [Dochas Code of Conduct on Images and Messages](#), the [UK Aid Direct Communications Guide](#) and the [ACFID Guide on how to create an EDMF](#).

As an organisation we are committed to the use of images and messages in communications in a way that portrays the Cambodian people we work with in a manner that respects their dignity, values, history, religion, language and culture, and is authentic to the context, person and terms of consent given. We acknowledge it can be difficult to put our values and communication principles into practice when sharing stories – especially stories dealing with historical trauma, injustice, and the acute learning crisis in Cambodia. We also acknowledge that unconscious bias plays a huge part in decision making and because of its very nature, it is difficult to address and mitigate the risks that it causes. We recognise that stories and images can be powerful calls to action, but acknowledge that what we do is a function of research and an understanding of the context in which we work and in fact we try hard to avoid a kneejerk or overly simplistic reaction that a single story or image might provoke.

Inevitably we can face conflicting demands. Misunderstanding cultural norms and mismanaging storytelling content can harm the people we strive to support in Cambodia and our organisation more broadly. This EDMF is just one element in a suite of tools to reduce risks in our communications as far as possible and to support ethical decisions.

### 4. Statement of Management

The Director of Development has responsibility for the regular review and updating of the ethical decision making framework. This will take place at least once every two years, however updates may be required more often.

### 5. Other Procedures and Policies

This EDMF is connected to other SeeBeyondBorders' policies and procedures, including:

- [Communications Policy](#)
- [Images Policy](#)
- [Anti-Discrimination, Harassment and Bullying Policy](#)
- [Child and Vulnerable People Protection Policy](#)
- [Complaints and Feedback Handling Policy](#)
- [Development Policy](#)
- [Ethical Standards](#)
- [Fundraising Policy](#)
- [Privacy and Cookies Policy](#)
- [Risk Management Policy](#)
- Risk Matrix
- [Code of Conduct](#)
- HR Manual

## 6. Accurate Communications

SeeBeyondBorders is aware of the need for our communications to be appropriate, in context and intent, as well as being honest and timely. The approval process for all images and messages is outlined in our communications policy. No material should be published without the approval from the CEO or the Director of Development. Failure to comply with this policy constitutes a breach of our Code of Conduct.

## 7. Making Ethical Decisions

Ethical decisions can be complex. When a situation has no clear 'right and wrong' answer, decision making can be difficult and require conversations and thought. More than one set of cultural norms and organisational values can equally apply to an issue, even if those norms and values are conflicting.

When many local Cambodian staff have a low level of education themselves it can be challenging to have the necessary conversations needed to ensure our communications are ethically responsible and contextually relevant. Furthermore it can be difficult for our foreign staff based in Cambodia to fully appreciate cultural norms or to decipher hidden local meanings. It is imperative therefore that our Cambodian staff feel that their voice is respected and valued and that raising ethical considerations is not a hindrance or a burden but extremely important and helpful.

The process for coming to a decision on an ethical dilemmas is set out in Sections 10, 11, 12 and 13. This EDMF includes a process which recognises and balances both donors and affected people but which gives primacy to the primary stakeholders.

## 8. Risk Assessment

SeeBeyondBorders has a practical approach to Risk Management as outlined in our Risk Management Policy. It details how risk is assessed according to an impact scale and a likelihood scale which combine to establish the risk priority and hence the importance of the relevant risk mitigation strategies.

Communications risks are identified in section 3 (Political) of the risk matrix. This matrix is regularly reviewed. In developing this EDMF, SeeBeyondBorders has further considered the risks associated with our communication activities.

The risk matrix looks at individual cases of risk and how they might impact on:

- Contributors and the communities in which we work in Cambodia
- Staff and volunteers across the organisation
- Governing bodies in Australia, the UK and Ireland

- Our partners
- Supporters and the general public
- Overall activities of SeeBeyondBorders
- The reputation of SeeBeyondBorders and other ACFID members
- The legitimacy of the development industry as a whole

The SeeBeyondBorders senior management team has the ultimate responsibility to identify and control risks on behalf of the SeeBeyondBorders Australia Board and to discuss periodically the major risks with the Board.

## 9. Roles and Responsibilities of Ethical Decision Making Committee

On the 3<sup>rd</sup> of September 2020 SeeBeyondBorders established an ethical decision making committee. This committee is comprised of those who work on a day to day basis in our communications team. They are the Director of Development, the IT Manager, and our Communications Officers. A Project Manager also sits on this committee to act as a liaison person with the community in Ek Phnom.

This committee is charged with assisting in the discussion of all ethically sensitive issues that arise in the creation and development of storytelling and communications content.

Individual roles and responsibilities are outlined below.

<b>Roles and Responsibilities in Relation to Ethical Decision Making Committee</b>	
Communications Officers	- Generally responsible for capturing the content and editing.
Project Manager	- Liaison person between local communities and our communications team - The contact point for those who are depicted in our communications after publication
Child Protection Officer	- Responsible for any child protection issues that arise
IT Manager	- Is the system administrator for images? He is responsible for the register which maintains the storage and codifying of images.
Director of Development/CEO	- Approves the publication of all communications

*\*On particular occasions others such as the Country Manager or CEO will also be consulted.*

## 10. Ethically Important Moments

This EDMF sets out the important questions we need to ask and explains when these questions ought to be asked throughout the storytelling and communications processes. It also explains who is responsible for having these discussions and what to do if a decision cannot be made. Below are seven 'ethically important' moments during the storytelling and publishing process, accompanied by key issues we could discuss at the relevant times. Further details on how to address these ethically important issues are contained in section 11 and other pertinent policies.

	When	Issues to Discuss	Who
<b>1. When Scoping a Story</b>	-Developing a storytelling concept -Scoping story leads	-Developing a storytelling concept -Assessing story leads	- Director of Development - Communications Officer - Project Manager
<b>2. When Planning to Gather Content</b>	-Planning a content-gathering trip or interview -Liaising with Project Managers to arrange logistics	-What are the ethical considerations? - Is getting informed consent possible? (See Section 11.c) - Protection of children and vulnerable persons (See CVPP Policy and Images Policy)	- Director of Development - Communications Officer - Project Manager - Child Protection Officer
<b>3. While Gathering Content</b>	- While on a content-gathering trip. This includes interviews for case studies, recording videos/the taking of photographs	- Informed consent (See Section 11.c) - Fuzzy boundaries / questioning (See Section 11.e) - Power dynamics in the telling of the story (See Section 11.a) - Power dynamics and voluntary consent (See Section 11.c) - Connection to values - Privacy (See Section 11.d) - Authorship and ownership (See Section 11.d)	- Director of Development - Communications Officer - Project Manager - IT Manager
<b>4. Directly After Gathering Content</b>	- Directly after gathering content in a school or community	- Documenting Informed consent or any challenges (See Section 11.c)	- Communications Officer - Project Manager - IT Manager
<b>5. While Creating the Storytelling Content</b>	- While creating materials to publish	- Connection to values (See Communications Policy) - Honest portrayal (See Section 11.d) - Authorship and ownership (See Section 11.d) - Fuzzy boundaries (See Section 11.e)	- Communications Officer - Director of Development - Project Manager

	When	Issues to Discuss	Who
<b>6. Just Before Publishing a Story</b>	- When publishing content on any channel	- Connection to values (See Communications Policy) - Fuzzy boundaries (See Section 11.e) - Informed consent (See Section 11.c) - Protection and Privacy (See Section 11.d) - Authorship and ownership (11.d) - Tone	- Child Protection Officer (where child protection issues are relevant) - Communications Officer - Director of Development*  <i>On occasions when content is of a sensitive nature (eg telling the story of a child or of a family in our CCP Program) the Director of Development may seek advice and direction from the CEO or Country Manager to ensure there is shared responsibility and consensus before publishing.</i>
<b>7. After Publishing</b>	- Once a story is in the public domain	- Audience Participation - Community Feedback	- Project Manager - Communications Officer - Director of Development

## 11. Key ethical issues to be considered

Below we have listed some key ethical considerations which are relevant for our communications processes along with some questions to help us reflect on and discuss these issues as part of the decision-making process as outlined above. Some of these questions may be easy to answer while others are best considered in conversations with others, as outlined in the framework above.

### a. Connection to values, principles and rights

Our discussions should ask:

- Are we in keeping with our five core values?
- Are we in keeping with our communications principles?

### Human rights

- Have we put the best interests of the contributor first?
- Have we respected the personal freedom and privacy of the contributor?
- Have we given the contributor control over how they are portrayed? In the case of a child have we given the parent/guardian control?
- Have we ensured the content is accurate?
- Have we translated the piece from Khmer to English or English to Khmer accurately?
- Does the story accurately portray the context and underlying issues we are looking to address while not being sensationalised?
- Does the story properly draw a connection between the subject and the issue?
- Are the power dynamics properly considered in the telling of this story?

**Children's rights**

- Have we ensured the interests of SeeBeyondBorders have not been put ahead of children?
- Have we adequately protected children or vulnerable persons?
- Have we respected the rights of all to dignity and respect?

**Women's rights**

- Have we considered how women are portrayed?
- Have we considered how gender-role stereotyping is portrayed?
- Have we given an adequate voice to women?

**Disability rights**

- Have we given people with disabilities the opportunity to contribute to this story where relevant?
- Have we considered how people with a disability are portrayed?
- When published, will this story be accessible to people with disabilities?

**b. Protection**

SeeBeyondBorders puts the wellbeing of its stakeholders first. We explain how we protect our stakeholders in our Child and Vulnerable Persons Protection Policy, Images Policy, Privacy Policy and Risk Management Policy. All staff and relevant 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:

**Protection of life**

- Could the contributor's life or safety be put at risk by sharing their story?

**Protection of dignity**

- Could we be putting the contributor or their community at risk of vilification?
- Have we considered how the contributor's family, friends and community might feel about the communications content?

**c. Informed consent for images and messages**

SeeBeyondBorders informed consent process is clearly defined and outlined in our Images 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:

**Correct information**

- Have we provided all the necessary information to the person providing consent?
- Have we shown the person providing consent examples of how the story might be used (including where it may be published and who will see it)?
- Have we consulted with the right people (including children's guardians, teachers and community members)?

**Clear comprehension**

- Does the contributor or the person giving consent fully understand the risks associated with sharing and publishing the story?
- Have we given the individuals involved enough advance notice about the project?
- Have we explained the communication process in a way the contributor fully understands (including children where practical), using the best-possible language?
- Is there a point of contact in SeeBeyondBorders for the individuals to discuss any issues arising?

**Voluntary consent**

- Is there a power imbalance between the contributor and the organisation or individual staff members?



- If there is a power imbalance, can you describe it?
- If there is a power imbalance, how can we reduce it?
- Does a power imbalance prompt the interviewee to make certain allegations?
- Can we authenticate any allegations?
- Is there an element of duress in the contributor's consent?
- If there is an element of duress, how can we address it?
- Are we confident that the contributor understands that they are able to withdraw their consent at any time?

#### d. Privacy

SeeBeyondBorders values and upholds the privacy of those who contribute to our communications. All staff, governing body members, partners and volunteers must abide by our Privacy and Cookies Policy. However, there are also context-related issues that arise in relation to privacy.

Our discussions should ask:

##### 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?

##### Authorship and ownership

We respect the right of contributors to control their stories. We respect the right of contracted writers and photographers to moral ownership of their works. While we always abide by our Privacy and Cookies Policy, there are some discussions that can help us understand our responsibilities regarding authorship.

Our discussions should ask:

##### Authorship

- How will contributors be acknowledged when publishing their stories?
- Does acknowledgement of authorship have implications for the privacy or anonymity of contributors?
- What ethical obligations do contributors and content creators have to the truthful representation of stories and data? To the best of our knowledge are they telling the truth?

##### Copyright

- Who owns the copyright of our communications content?
- Are there any conflicting copyright claims for communication materials we have published (or are seeking to publish)?

#### e. Fuzzy boundaries

The communications process is often 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'.

We acknowledge there is the potential for the content-collector role to become blurred in processes that involve building rapport with contributors. We also acknowledge that this potential is intensified in storytelling projects where content creators spend significant periods of time engaged in schools and communities. Questions asked should relate to responsibilities, boundaries and the central message of the communications piece. Our discussions should ask:

**Content-creator responsibilities**

- How should we develop a relationship with the contributor?
- Should we explore how our unconscious biases affect this project? How might we change the storytelling process as a result of exploring our unconscious biases?
- What are the responsibilities that fall directly on the content creator?

**Other people's responsibilities**

- What are the different roles of those involved in the storytelling project?
- Does everyone in the project understand their role and others' expectations of them?
- How do we respond to any blurred roles and relationships during the course of the project?

**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, contributors or others become personally over-invested?

**12. Golden Rules**

During the entire storytelling and publishing process, we keep these two questions in mind:

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

**13. Who to talk to if you are still unsure**

Making decisions about some of these issues can be difficult. There may be times when we are 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 Director of Development or the CEO.

The final decision on all communications lies with the CEO or his communications delegate the Director of Development.

Approved by CEO: \_\_\_\_\_

Date: \_\_\_\_\_

Formal review required on or before: \_\_\_\_\_ (Date)