COMMUNICATION AND TRANSPARENCY POLICY

Last updated **30 June 2025**

> **Key Points**
>
> Our communication is clear, concise and accurate.
> We respect the dignity and rights of our partners, program participants and local communities when we share stories about our work.
> We are transparent in our activities.

1. Why this policy exists

By collecting stories, videos and images about the people we work with, Caritas Australia can raise awareness about communities, the type of work we do, and the impact of our work. In collecting these images and stories, we have a responsibility to ensure that all content is collected and used ethically, honestly and sensitively, with respect for people's dignity and culture.

Caritas Australia follows relevant guidelines and principles in the ACFID Code of Conduct, Department of Foreign Affairs and Trade requirements, Australian Charities and Not for Profit Commission Governance Standards, Caritas Internationalis Management Standards and other relevant codes.

2. This policy applies to

This policy is particularly relevant to personnel who work in fundraising, advocacy, marketing, communications and programs.

We provide training to personnel who regularly collect stories, videos and images of our communities, parishes, and schools in Australia, as well as our partners, program participants and the communities in which they live. Guidelines are provided for those who less frequently collect stories videos and images.

3. Definitions used in this policy

When we use …	we mean ...
materials	Any communications, including print and digital content, used to convey stories and examples about the work of CA. These materials may be for audiences including supporters, donors, media, stakeholders and the public, as well as partners and program participants.
personnel	Any person conducting paid or unpaid work for, or on behalf, of CA including Australian-based employees, in-country employees, Board of Directors, Diocesan Directors, volunteers, contractors, sub-contractors, consultants.

children	Any person under the age of 18, regardless of whether a nation's laws or customs recognise adulthood earlier.
development activities	the provision of long-term support by working in partnership with communities that experience poverty, injustice, hunger and oppression and facilitating the promotion of human dignity, human rights and common good. Development programs do not include welfare, partisan political or religious activities.
non-development programs	Programs which include welfare, partisan political or religious activities.
humanitarian programs	Programs that deliver immediate relief, recovery, and rehabilitation in response to suffering caused by natural disasters and/or conflicts, as well as action to prevent and prepare for them
fundraising	All activities geared towards generating financial support for CA. The process of gathering voluntary contributions of money or other resources, by requesting donations from individuals, businesses, charitable foundations, or governmental agencies.
reputational risk	The potential for negative publicity, public perception or uncontrollable events to have an adverse impact on CA's reputation.
program partners	Individuals or organisations that Caritas Australia works with, accompanies and supports to deliver humanitarian and development programs or activities
high risk of reputational damage	An event that has a high (likely or almost likely) probability/likelihood or high (likely or almost likely) impact/consequence of impacting negatively on the income, brand, support or public image of CA or on the reputation on the source of CA funding including but not limited to fraud, corruption, safeguarding and child protection concerns and financial wrongdoing
informed prior consent	Permission requested before collecting a story, image or video that ensures the person involved understands explains how it will be used

4. Guiding Principles

4.1 Dignified

The inherent dignity of each person is at the foundation of everything we do and our storytelling adopts a strength-based approach that emphasises the resilience and dignity of participants The privacy, values, history, religion, language and culture of the people we portray is respected. People will be shown as active partners in the development process with hope for change and will not be portrayed as victims or passive recipients of assistance.

4.2 Truthful

We are truthful, clear, concise, consistent and informative in our communication. We depict people and their issues, experiences and lives accurately, respectfully and truthfully ensuring honest visual portrayals and stories.

4.3 Transparent

We are transparent when communicating the results of our programs and the effectiveness of our advocacy work. We share appropriate information, in a timely and accessible manner, such as use of donated funds, financial statements and reports. We will not embellish, exaggerate, manipulate or alter meaning, facts, or context.

4.4 Representative

Our materials provide clear examples of our work with communities, partners and participants, as well as the impact of this work. We amplify and prioritise the voices and experiences of communities. This means providing a space for them to tell their own stories and provide their own perspectives rather than speaking or narrating on their behalf.

4.5 Compliant

We ensure that our communication activities adhere to all CA policies, particularly the Child Protection Policy and the Diversity, Equity and Inclusion Policy, as well as the ACFID Code of Conduct, ACFID Fundraising Charter and DFAT guidelines, as outlined in the ANCP Manual and the AHP Communications and Visibility Strategy.

4.6 Ethical

We obtain information for communication materials ethically and responsibly. We follow the principle of "do no harm" and mitigate any potential risk of someone telling their story. Freely given and informed consent is always sought as a pre-requisite for the collection of any content.

5. Policy Commitments

5.1 Collecting, storing and using stories, videos and images

We treat partners, program participants and others as equal partners when collecting and sharing stories.

5.1.1   Before collecting material, we must get informed prior consent that is documented appropriately. This means we obtain permission before taking a photo or video, and that the person(s) involved understands:

- Why their image story or personal details are being collected
- Where and how they will be used and over what period
- That their participation is entirely voluntary
- That they do not have to be identified if they don't want to be
- The potential risks and consequences of their image, name and words being published
- That they may withdraw consent at any time, and that CA will make all reasonable efforts to give effect to this request.
- This permission needs to be culturally appropriate and sensitive to context. When possible, consent should be requested in advance, allowing the person sufficient time to consider their decision.

5.1.2   In the case of children, consent must be provided by an adult guardian. The school, location and surnames of the child must never be identified in any public material. Pseudonyms may be used in consultation with the parents and partner.

5.1.3   Written consent is preferable but not always possible or appropriate depending on the cultural and security context. Verbal consent must be documented, and recorded via video or recorded on a Caritas Australia consent form

5.1.4   We always ensure that any communication materials clearly distinguish between the work of Caritas Australia and the work of Caritas Internationalis network, where they are different.

5.1.5   We are careful when we collect or use material so that it is not detrimental to the people or community involved.

- We safeguard children when photographing, filming or interviewing a child, or when using children's images. Children are portrayed in a context relevant to CA work, adequately clothed, and not in a vulnerable, submissive or sexually suggestive manner.

- We respect First Australian Peoples' unique history, diverse cultures and customs and their right to protect their heritage. We will accompany our First Australian partners and be led and guided by them. We will honour sensitivities around taking and reproducing names, information, videos and images.

- Advice is sought from schools and parishes to ensure permissions apply to each person.

- Our project partners are consulted about obtaining appropriate permissions and on any potential risks related to using images and case studies.

- We assess the risks of publicly sharing a participant's story and imagery. We will not share content that will pose a risk to the safety of the participant.

5.1.6   We ensure that established quality and accuracy checks are provided, and approval processes are followed to ensure that all public materials are accurate and reflective of the dignity and the values of the people profiled.

5.1.7   All materials reflect the strengths-based approach to our work.

5.1.8   Records are securely maintained including:

- The origins of images and case studies

- Permissions and copyright releases, and

- Key details including name, age, location, date, program association and form of consent

5.1.9   Photo data (such as file labels, meta data or text descriptions) do not reveal information about a child that could identify them, such as their name or location. GPS tracking is turned off before taking photos.

5.1.10   We use other CA governance documents, including the Collection, storage and usage of Content Procedure as well as the Ethical Decision-Making Framework, before sourcing and publication to ensure images, videos and stories meet the above requirements.

5.2 Representing Caritas Australia in the media

5.2.1   The CEO and Chair of the Board can speak to the media on behalf of Caritas Australia. They are the only pre-nominated media spokespeople for CA. Other personnel (including members of the Leadership Team, the Advancement Director and other employees) may be delegated to speak on behalf of CA in specific circumstances only.

5.2.2 We seek to establish and maintain a positive and open relationship with the media. To do so, all media queries should be directed to the Media Lead in the first instance. All Board members, employees, volunteers and external spokespeople are required to follow this policy and not approach or respond to media without contacting the relevant Communications team member first.

5.2.3 The Media Lead is responsible for the preparation and dissemination of public media materials including (but not limited to) media releases, public statements, response to media queries, and op-eds. Approvals are made in line with the Delegation Policy.

5.2.4 Country Representatives have the authority to represent Caritas Australia in their own country with local media with approval of the Media Lead. If a matter has a high risk of reputational damage, it must first be referred to the Regional Manager and to the Advancement Director or approval.

5.2.5 Caritas Australia will meet all requirements under DFAT contracts. This includes notification to DFAT whenever we become aware of information that may pose a reputational risk to CA, the program or to DFAT as soon as we become aware of such information.

5.2.6 Country Representatives, Diocesan Directors and other designated roles have the authority to represent Caritas in the local media to promote fundraising activities including Project Compassion. Promotional materials must be pre-approved prior to distribution.

5.2.7 Employees, Board members, volunteers and third parties are encouraged to deliver public presentations that discuss Caritas Australia's work and its goals. It must be clear to the audience whether the presentation is being made as an official representative of Caritas or in a private capacity.

5.2.8 Employees have a particular role in being aware of how they represent CA in public. This includes the need to exercise good judgement and common sense in publishing on social media and always taking care not to purport to be representing the views of CA. Employees are accountable for what they communicate.

5.3 Fundraising

5.3.1 All fundraising practices are developed in line with the ACFID Fundraising Charter, ACNC Governance Standards, ACNC External Conduct Standards, the Fundraising Institute of Australia (FIA) Code of Ethics and Professional Conduct, DFAT Standards and the Caritas Internationalis Management Standards. Our identity including name, address and Australian Business Number will always be provided on materials. We strictly adhere to the Privacy Act 1988.

5.3.2 Fundraising documentation will clearly state if there is a specific purpose for which funds are being raised, how money collected will be used, how money collected in excess of the required amount will be spent, and any other information as required by appropriate Federal and State Legislation. Appeals will be made based on justice and common humanity and not guilt, presenting a message of potential change and ultimately contributing to a positive understanding of development.

5.3.3 All fundraising material are aligned with Catholic Social Teaching and guided by Caritas Australia's Ethical Storytelling Guidelines.

5.3.4 Matched giving involves Caritas Australia securing a lead donation amount(s) (matching gift) from a pledging donor(s) for a fundraising appeal and promoting to potential

supporters that their donation in response to the appeal will be matched to the value of the lead donation amount.

- This value is our matched giving appeal target.
- Caritas Australia is committed to communicating transparently and responsibly throughout this process.
- Once the appeal target is achieved this will be clearly communicated on the matched giving website.
- It will also be communicated on the appeal form that donations will no longer be matched once the target is achieved.
- If the appeal target is not reached the lead donor(s) will be notified of the change of circumstance to discuss options for their gift and/or a possible further appeal extension.
- All lead donations will remain anonymous unless indicated by the lead donor that public acknowledgement is approved.

5.4 Acknowledging grants and income

5.4.1 We meet our funding obligations and openly acknowledge the support the Australian Government provides through program funding and grants.

5.4.2 This transparency shows where and how Australian Government funds are being used. The Australian Aid identifier will be used on all aid-related products and activities funded by the Australian Government.

5.4.3 For ANCP-funded projects, all communication materials will include the Australian Aid identifier together with text that acknowledges the Australian Government and the ANCP.

5.4.4 For AHP-funded projects, the Australian government, via the AHP, will be acknowledged as the source of funding in printed and online communications. The Australian Aid Identifier will be used in communications related to the AHP except for in-country branding in Papua New Guinea, which will use the Papua New Guinea Australia Partnership aid identifier.

5.4.5 Acknowledgement is in line with DFAT's Visual Identity Guidelines, and may include but is not limited to:

- Publications, Annual Report, signage, events, videos, websites, social media, media releases, and verbal acknowledgement during speeches and interviews

- The Australian Aid identifier on the Caritas Australia website

- Supporting in-country publicity through the local press

- Ensuring program participants understand the source of the support

- Focusing on project outcomes and impact when promoting Australia's aid program

5.4.6 We are committed to promoting and recognising The Australian Government and wider public support by:

- Encouraging and inviting visits by Australian officials and major donors.

- Keeping Australian Embassy and High Commission personnel informed of our, and our program partners, work

- Ensuring program participants understand where support is coming from

- Regularly publish and share content with DFAT that highlights the partnership between Caritas Australia and the Australian government, as outlined in the ANCP manual.

- Labelling and badging of project materials

- Ensuring signage used in-country acknowledges Australian government support, and

- Ensuring that media releases and in-country media refer to activities and achievements supported by the Australian government,

- Other activities as relevant

5.5 Partners

Our program partners receive training and support to ensure they understand and can comply with their obligations regarding transparency and communication. Program partners are also supported in the development of their own policies and procedures for the collection and use of images, videos and stories.

5.5.1 Partners are required to:

- communicate to the public and the communities in which they work in an accurate and honest way

- collect and use images, videos and stories in an ethical manner, maintaining the dignity of those featured in the stories, minimise any potential risks, especially regarding children and vulnerable adults

- obtain informed and freely given consent for images, videos and stories at all times prior to gathering content and to share the consent form with Caritas Australia

- acknowledge the support of DFAT, where relevant, and to follow DFAT's Visual Identity Guidelines, in public communications such as press releases, newsletters, annual reports, on websites and project signage.

- participate in training modules and online sessions to keep up to date on informed consent requirements.

5.5.2 We will ensure that program partners make a separation between development and non- development activities in fundraising material, other public communications and in program reporting.

5.6 Artificial Intelligence (AI)

Caritas Australia recognises the growing role of Artificial Intelligence (AI) in enhancing communication practices, improving efficiency and conserving resources.

In alignment with our commitment to transparency, ethical conduct, and the dignity of all people, we are committed to the responsible use of Artificial Intelligence technology in our communications. The principles underlying our adoption of AI in communications include:

5.6.1 **Authenticity -** AI will not be used to create misleading, deceptive, or manipulated content. This includes the generation of false or fabricated images, videos, or audio (e.g. deepfakes) that misrepresent real people, events, or the experiences of communities we serve. Authenticity and truthfulness are essential to preserving trust and dignity in our communications. We will avoid use of AI in ways that may perpetuate bias or take power away from individuals or communities we serve.

5.6.2 **Human Oversight** - all AI-assisted outputs, which may include written materials, or translations, will be subject to human review to uphold accuracy, integrity, and alignment with Caritas Australia's values and Catholic Social Teaching.

5.6.3 **Privacy and Protection** - Caritas Australia will ensure that any use of AI complies with our data protection standards. We will not use AI tools that compromise the

privacy or dignity of our staff, partners, or the communities we support. We will not upload any sensitive partner, participant or supporter information to AI tools.

5.6.4 **Continuous Monitoring and Accountability** - as AI technologies evolve, Caritas Australia will regularly review its use of these tools to ensure ongoing alignment with ethical standards and stakeholder expectations. Feedback and concerns about AI-generated content will be addressed promptly and transparently

5.6.5 The use of AI in marketing and communications includes:

- Assisting with the drafting of reports, articles, social media posts, and newsletters (subject to human review).

- Improving accessibility and efficiency for outputs such as transcription and translation services

- Analytical purposes such as identifying trends and performances based on campaign performance data.

5.6.6 AI will not be used for the following purposes:

- Fabricating stories of program participants or communities.

- Generating images, voices, or videos that could be mistaken for real individuals.

- Distorting the voice or facial expression of a participant to enhance supporter sympathy.

5.7 Social Media

5.7.1 We are committed to promoting the work of Caritas Australia and our partners through social media. However, it is important that no inadvertent damage is caused to Caritas Australia, an individual or another organisation.

5.7.2 The only Caritas Australia personnel who have access to usernames and passwords for official CA social media sites are approved Editors and Administrators.

5.7.3 All social media account passwords are stored securely and managed appropriately, using the Social Media Channel Register.

5.7.4 All social media content and responses must be approved by the Marketing and Communications Team.

5.7.5 When posting on social media either for the purposes of Caritas Australia business or in their personal capacity, all Caritas Australia personnel and stakeholders are bound by our Code of Conduct and other policies. We expect Caritas Australia personnel and stakeholders when posting on social media either for the purposes of Caritas Australia business or in their personal capacity will:

• Uphold the good reputation of Caritas Australia and not publish anything that would cause reputational damage to the organisation.

• Not use the Caritas Australia or our partners logo or branding on any social media platform without the prior consent of the Marketing and Communications Team.

• Respect other people's views, opinions and cultures and act courteously.

• Not engage in discriminatory, defamatory, bullying or harassing behaviour.

• Not infringe another person's intellectual property.

• Not infringe principles of privacy or breach confidentiality.

• Adhere to all Caritas Australia policies and procedures

5.7.6   Disciplinary action can be taken when breaches of the Social Media Procedure are found.

Contacting us

The Caritas Australia Media team can be reached at caritasmedia@caritas.org.au and by phone on 0412 179 063.

6. Roles and Responsibilities

At Caritas Australia, we recognise that a culture of communication and transparency starts with strong leadership.

6.1The Board of Directors is responsible for:

• Ultimate accountability for our organisation policies

• Guiding governance and culture of Caritas Australia through strategic leadership

• Approving this policy and holding the Leadership Team accountable to how effectively this policy is implemented

6.2 The Chief Executive Officer is responsible for:

• Ensuring this policy is upheld

• Informing the Board of any concerns relating to communication and transparency that may present risk to Caritas Australia, its personnel, program participants, partners, reputation, operations or other activities, and in particular any concerns related to safeguarding of children and vulnerable people

• Ensuring all senior employees are accountable to this policy

• Creating a culture that supports open and honest communications

6.3 Leadership Team members are responsible for:

• Leading by example

• Ensuring procedures, practices, plans and operations align with this policy

• Advising of any communication risks or concerns within Caritas Australia activities

• Ensuring their team is aware of this policy and understand their responsibilities

• Promoting this policy to personnel and partners

• Educating, training and empowering personnel to understand the importance of communications and transparency and the rights of program participants

6.4 The Advancement Director is responsible for:

• Ensuring the Policy complies with CA obligations and contemporary practice and will update the policy as required including compliance with State and Federal legislation, DFAT requirements, the ACFID Code of Conduct, Caritas Internationalis Management Standards and the FIA Code, ACNC Governance Standards and ACNC External Conduct Standards

• Addressing any issues arising in relation to this policy

- Informing the CEO of any risk regarding communications and transparency and will ensure that risks are recorded
- Managing the use of all communication material including images and stories
- Providing leadership with regards to image and story collection
- Ensuring that 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 program participants.
- Implementing and monitoring the CA Marketing Communications strategy

6.5 Managers are responsible for:

- Ensuring all communication materials meet the guiding principles of this document and model open and honest communication
- Communicating this policy and all related procedures regularly and ensuring materials are approved in line with this procedure
- Ensuring their teams and partners understand the expectations of this policy
- Participating in the resolution of any communication and transparency issues. We have a shared responsibility to ensure a culture of protecting privacy is at the forefront of all decisions and interactions of our work.

6.6 All personnel (including you) are responsible for:

- Understanding and following this policy and related procedures
- Ensuring that your actions are in line with this policy, and that your work reflects the Guiding Principles and Policy Commitments above
- Not encouraging others (directly or indirectly) to breach this policy
- Reporting any breach to your manager. However, if it is a sensitive complaint, you must report it to confidential@caritas.org.au (the Complaints Focal Point) or Stopline whistleblower service

7. Related Documents

This policy supports Caritas Australia's compliance with the following:

7.1 Legislation:

- Australian Privacy Act 1988

7.2 Standards:

- Caritas Internationalis Communications Manual
- Caritas Internationalis Management Standards
- The Australian Council for International Development (ACFID) Code of Conduct and Fundraising Charter
- The Fundraising Institute Australia (FIA) Code
- Australian Charities and Not-for-profits Commission Governance Standards
- Australian Charities and Not-for-profits Commission External Conduct Standards

- Australian Government Department of Foreign Affairs and Trade (DFAT) Child Protection policy and associated guidelines

- Australian Government Department of Foreign Affairs and Trade (DFAT) Guidelines and Australian NGO Co-Operation Program (ANCP) Manual

- Department of Foreign Affairs and Trade (DFAT) Logo and Style Guide

7.3 Caritas Australia governance documents:

- Code of Conduct

- Privacy Policy

- Speaking Up Policy

- Conflict of Interest Policy

- Child Protection Policy

- PSEAH Policy

- Delegation Policy and Delegation Register

- Crisis Communications Strategy and Guidelines

7.4 Communication Procedures

- Procedure for Collection, Storage and Usage of Content Procedure for Acknowledging the Australian Government in our Communications and Activities

- Procedure for Approving Public Facing Content

- Social Media Procedure

- Brand Guidelines

- Ethical Decision-Making Framework

- Ethical Storytelling Guidelines

- Style Guide

8. Information about this policy

Can be accessed by	Anyone via website
Can be shared with	Internally and externally (including with other organisations)
Distributed to	Any person doing paid or unpaid work for, or on behalf of, CA including Australian-based employees, in-country employees, Board of Directors, Diocesan Directors, volunteers, partner organisation or anyone in a relevant role
Document Owner	Advancement Director
Approved by	Board of Directors
Commencement Date	01 Oct 2020
Next Review Date	25 July 2028
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How this policy has changed over time

Version	Approval Date	Summary of changes
v1.0	22 Sep 2020	New document.
v1.1	18 Nov 2020	Put in new format.

V1.2	25 July 2025	Added in sections on use of Artificial Intelligence and social media.
		Incorporated ethical storytelling principles into the document.
		Included a section on Matched Giving in fundraising.
		Expanded on DFAT compliance responsibilities.
		Updated titles based on current organisational structure.