## ETHICAL DECISION-MAKING FRAMEWORK FOR COMMUNICATIONS POLICY

| Policy Number: | 20 | Version:2 |
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| Updated by: | Paul Taylor | Effective from: 3 September 2025 |
| Reason of Review: | Scheduled Review | Scheduled review date: As per schedule |

## INTRODUCTION

Established in 2000, Mercy Works Limited (MWL) is the development arm of the Sisters of Mercy in Australia and Papua New Guinea.

We work in partnership with vulnerable communities and local organisations domestically and in the Asia Pacific region. We work with the people of these communities and organisations to build capacity, dignity and self-reliance.

## 1. SCOPE

This policy provides guidance to MWL Board Directors, committee members, employees contractors, volunteers, (defined as Workers) in relation to their work with/for MWL.

The policy also applies to 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.

To meet the regulatory requirements, MWL has reasonable processes in place to ensure the procedures and tools for seeking consent meet ethical guidelines, are made available in the local languages of PNG (Tok Pisin) and Timor Leste (Tetum) with all exceptions clearly explained.

## 2. PURPOSE

The purpose of this document is to detail MWL's Ethical Decision-Making Framework for Communications Policy (EDMF). The policy aligns with our vision that the communities we work with all have equal access to basic human needs such as education, health care and social welfare.

The policy commits to the use of images and messages in communications in a way that portrays the affected people 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.

The MWL decision-making process integrates a range of key staff in the organisation in decision-making, as appropriate, and defines clear responsibilities for the approval for public use of images and messages. The

policy provides a process which recognises and balances both donors and affected people, but which gives primacy to the primary stakeholders.

The MWL 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 organisation is maintained. The EDMF aims to ensure our organisation is using best-practice communications methods that minimise the risks related to storytelling and publishing.

MWL have aligned this EDMF to the Australian Council for International Development (ACFID) Code of Conduct Principles 6.2 and 8.1:

- Commitment 6.2.1 – Members' communications are accurate, respectful, and protect privacy and dignity; and

- Commitment 8.1.2 – Members report their compliance with the ACFID Fundraising Charter annually to their own governing body.

It is also noted that the following ACFID Code of Conduct Principles support ethical communications:
- Quality Principle 1 - Rights, protection and inclusion
- Quality Principle 2 - Participation, empowerment & local ownership
- Quality Principle 4 - Quality and effectiveness
- Quality Principle 6 - Communication
- Quality Principle 7 - Governance
- Quality Principle 9 - People & Culture

Any exemption to this Policy must be applied for in writing, for approval by the Executive Director. Any exemption granted by the Executive Director must be in writing.

## 3. DEFINITIONS & ACRONYMS

Terms used in this policy are:

**Child** refers to any person under the age of eighteen (18) years as defined by the Convention on the Rights of the Child irrespective of local country definitions of when a child reaches adulthood.

**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.

**Cultural 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.

## 4. APPLICATION

### 4.1 Making Ethical Decisions

This policy explains how to make ethical decisions when creating and publishing communications content. It uses a framework of structured discussions during the storytelling process with the aim of reducing risks associated with storytelling and protecting 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; 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 policy 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 MWL encourages exploration of ethically grey areas. 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.

### 4.2 Risk Assessment

In developing this policy, MWL has considered the risks associated with all its communications activities and how they might impact on:

- contributors and the communities in which we work

- staff and volunteers across the organisation
- the MWL Board
- our partners and contractors
- supporters and the general public
- overall activities of MWL
- the reputation of MWL and other ACFID members

The following on-going risks have been identified within our Risk Register:

a) harm or damage to one or more primary stakeholders via the misrepresentation of their identity, culture, experiences, situation, or an event, or in any other way impacting on their dignity

b) harm or damage to one or more primary stakeholders by exposing their identity or information via breaching their privacy rights

c) harm or damage to one or more primary stakeholders by storytelling in such a manner that unconscious bias has resulted in moral judgement of them, their culture, or community

d) damage to the reputation of MWL as a result of being responsible for, or associated with, acts of storytelling resulting in a), b), or c) above.

This policy 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.

### 4.3 Who is the audience and who is telling the story?

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

- Executive Director
- Overseas Programs Coordinator
- Refugee Projects Senior Coordinator
- Indigenous Projects Coordinator
- Mercy Works Connect Coordinators in Sydney, Ballarat & Bendigo, Perth and Melbourne
- Mercy Works PNG, In-Country Coordinator
- Fundraising and Marketing Coordinator
- Grants Coordinator

### 4.4 Storytelling process phases

There are three high-level phases in the storytelling process:

a) **Scoping a story**: Developing a concept, scoping the story leads (beginning sentences), and writing a Terms of Reference.

b) **Obtaining Content:** Content for a story may be gathered during face-to-face communication, on purposely planned visits to specifically chosen locations, a phone call, email and online video meetings, and in the course of everyday project-related activities. MWL will ensure consent is given, that privacy and protection issues are considered and discussed, and firm boundaries to the scope of content gathering are established in terms of:
    - who is involved
    - the topics to be covered
    - the authorship and ownership of the information
    - images are agreed to and known.

c) **Creating and publishing and marketing the storytelling content**: While creating and publishing materials to publish, MWL considers the connection of the storytelling with our values, and with

authorship and ownership rights (including copyright). This includes the following forms of mediums:

- social media
- website content
- editing photos and videos
- creating pamphlets and brochures.

MWL is also mindful of unconscious bias which includes bias relative to gender, race, sexuality, age, religion and body weight. The ACFID Unconscious Bias Tool is a useful resource to explore our unconscious bias when storytelling.

## 4.5 Key ethical issues

There are six key ethical issues that are relevant for MWL's storytelling and publishing process. Below are some questions to help us reflect on and discuss these issues 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:

### 4.5.1 Connection to MWL's values

**Human rights**
- Have we put the best interests of the contributor first?
- Have we ensured we 'do no harm' to the contributor during the storytelling process?
- Have we treated the contributor with dignity and fairness?
- Have we respected the personal freedom and privacy of the contributor?
- Have we encouraged the contributor to freely express their thoughts and feelings?
- 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 ensured the best interests 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 a 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 their story?

### 4.5.2 Protection

MWL puts the wellbeing of its stakeholders first. MWL explains how it protects its stakeholders in the Child Safeguarding Policy, Privacy Policy and Risk Management Framework for MWL. All staff and stakeholders must uphold these policies. There are no exceptions. Discussions should consider:

**Protection of life**
- Could the contributor's life be put 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 their story?
- Could the contributor risk being cut off from important services by sharing their 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 feel about the storytelling project?

**Protection of identity**
- Publishing sensitive information about people can cause them harm and distress. To protect people, it's sometimes necessary to conceal their identity when sharing their stories.

### 4.5.3 Informed consent

MWL ensures that informed consent is always obtained in our storytelling activities. There are context-specific issues that arise in relation to informed consent. Discussions should consider:

**Correct information**
- Have we provided all 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 will 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 a power imbalance between the contributor and the organisation?
- If there is a power imbalance, can you describe it?
- If there is a power imbalance, how can we 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?

### 4.5.4   Privacy

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

**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?

### 4.5.5   *Authorship and ownership*

MWL respects the right of contributors to control their stories. MWL respects the right of contracted writers and photographers to moral ownership of their works. MWL acknowledges that ownership and 'control' of stories can raise difficult ethical questions. While the MWL Privacy Policy is always a key consideration, there are some discussions that can help us understand responsibilities regarding authorship. Discussions should consider:

**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 content?
- 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?

### 4.5.6   Fuzzy boundaries

MWL understands the storytelling process is built on relationships, and sometimes the network of relationships is complex. MWL acknowledges 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'.

MWL acknowledges there is the potential for the content-collector role to become blurred in storytelling processes that involve building rapport with contributors. MWL also acknowledges that

this potential is intensified in storytelling projects where content collectors spend significant periods of time engaged in fieldwork. Discussions should consider:

**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 moral responsibilities that fall directly on the content collector?

**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 different people involved in the project see the purpose of the storytelling project? If there are different perspectives, how do we manage any 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, contributors or others become personally over-invested?

### 4.5.7 Where to go for help

Making decisions about some of these issues can be difficult. There may be times when there is uncertainty whether an image, story or information should be used even after discussing the key issues and reviewing other policies and guidelines.

During the entire storytelling and publishing process, three questions should be considered:

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

The Executive Director will discuss any issues relating to the use of an image, story or information with MWL's staff and members and will make the final decisions relating to communication materials.

## 5. BREACH

A breach of this policy may result in disciplinary action that may involve severance from the organisation.

## 6. AUTHORITY

This policy is approved and reviewed by the Board.

## 7. RELATED POLICIES/DOCUMENTS

Other organisational policies, legislation, and codes should be read in conjunction with this policy and with MWL's ethical value principles include:
- Social Network Policy
- Acceptable use of Electronic Communications Systems (including emails) and Devices Policy
- Privacy Policy

- Code of Conduct Policy
- Management of Concerns, Complaints and Commendation Policy
- Prevention of Sexual Exploitation and Abuse Policy
- Risk Management Framework for MWL
- Child Safeguarding Policy
- One to One Interactions with Children Policy
- Transparency and Accountability Policy
- Human Rights Policy
- ACFID Code of Conduct - Commitment 6.2.1 and 8.1.2

## 8. CONTACTS

Executive Director
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## 9. REVIEW

Review of this policy, related forms and resources will be undertaken every two years by the Executive Director and approved by the MWL Board.

## 10. REVISION/MODIFICATION HISTORY

| Date | Version | Current Title | Summary of Changes | Approval Date | Commencement Date |
|------|---------|---------------|--------------------|--------------|--------------------|
| 17 March 2021 | 1 | Ethical Decision-Making Framework for Communications Policy | New Policy | 17 March 2021 | 18 March 2021 |
| 17 July 2025 | 2 | Ethical Decision-Making Framework for Communications Policy | Revised introduction, Style Consistency | 3 September 2025 | 4 September 2025 |

## 11. APPROVAL DATE/REVISION SCHEDULE

Approved by: Board, Mercy Works Limited
Date:  3 September 2025

To be revised:  September 2027

| Board Chair Signature | *Joseph Zabar* |
|------------------------|----------------|
| Date | 15 January 2026 |