

MAA INTERNATIONAL



ETHICAL MARKETING AND FUNDRAISING POLICY

maa

Work Product Unique ID: POL-MFR100

© Copyright MAA International, 2023

Version 1.0, 28 August 2012

Version 2.0, 02 February 2016. Effective Immediately

Version 3.0, 04 March 2020

Version 3.2, 15 August 2021

Version 3.3, 06 January 2023

Next Review Date: 05 January 2025

Table of Contents

1	Introduction.....	3
1.1	Purpose	3
1.2	Policy Scope.....	4
1.3	Roles and Responsibilities.....	4
1.4	How to use this policy	4
2	Definitions and Terms.....	5
3	Policy & Procedures	6
3.1	Guiding Principles.....	6
4	Ethical Decision-Making Framework.....	8
4.1	Ethically Important Moments	8
4.2	Ethical Framework.....	8
5	Availability of Information	9
5.1	Information that will be shared	9
5.2	Information that will not be shared.....	9
5.3	Requesting further information.....	10
6	Guidelines for The Distribution of Information.....	11
6.1	Accuracy and quality of information	11
6.2	Timeliness of information.....	11
6.3	Accessible	12
6.4	Ethical communications	12
7	Revision History.....	13
8	Appendix A.....	14
9	Appendix B.....	15

1 INTRODUCTION

The Board of MAA International (MAA) is committed to ensuring that fundraising and marketing activities are carried out in an ethical manner.

MAA International (MAA) uses Images Stories in its promotional materials and communications through a variety of platforms to describe MAA, its objectives and projects. In addition, images and Stories often feature the people who are the direct beneficiaries of MAA's projects in the communities where MAA works.

MAA also uses a range of platforms to provide detailed information to its stakeholders, whether this be donors, members, supporters or members of the general public. This includes using MAA's website (on which it publishes information about its projects, operations and financial performance), social media platforms, regular e-newsletters updating MAA's stakeholders on its activities, and public presentations to stakeholders, its peers or the wider community.

1.1 PURPOSE

The purpose of this document is to identify MAA's position on fundraising and marketing practices and to document the standards expected in promoting and raising funds from the community. MAA does this by ensuring:

1. Information related to MAA's operations, decision-making, finances, structure, policies, procedures, and governance is transparent, accessible and communicated to stakeholders and the broader community;
2. MAA disseminates accurate, truthful, timely as well as accessible information to its stakeholders and members of the public; and
3. the use of Images and Stories portraying women, men and children from the communities in which we work by MAA in its promotional materials and communications respects the dignity of Local People in accordance with MAA's Commitment.

In furtherance of this purpose, this Policy includes an Ethical Decision-Making Framework (EDMF) for communications which explains how to make ethical decisions when creating and disseminating Publications.

1.2 POLICY SCOPE

This Policy applies to all MAA Staff and Partner Staff. However, while all staff, volunteers and members are responsible for ensuring MAA's communications are timely, accurate and ethical, certain MAA Staff members and Partner Staff will have greater responsibility in ensuring compliance with this Policy and the EDMF. In particular, these will be persons who source Images and Stories, gather content and/or are involved in Publications, namely, communications staff, multimedia producers and media relations persons, program staff and marketing and fundraising staff.

This Policy also applies to members of the public who undertake do-it-yourself fundraising on behalf of MAA.

1.3 ROLES AND RESPONSIBILITIES

The Board is responsible for the implementation and review of this policy.

All Board members, casual, permanent and contract staff and volunteers are responsible for adhering to this policy.

1.4 HOW TO USE THIS POLICY

This document explains the purpose and scope of this policy. In addition, significant roles and responsibilities for all MAA personnel and definitions have been described in this section.

This document explains the guiding principles used to develop MAA's Ethical Marketing and Fundraising Policy.

2 DEFINITIONS AND TERMS

Term	Definition
Images	Moving or still representation of an individual in either film or digital media.
MAA Activity	Any proposed or existing programme or project to which MAA contributes funds.
MAA Partner	Any implementing partner organisation engaged by MAA in delivering an MAA Activity.
MAA Staff	All employees, volunteers, contractors, consultants, officers and directors of MAA.
Partner Staff	All employees, volunteers, contractors, consultants, officers and directors of a MAA Partner.
Publication	Anything made public by print, computer modem or program, internet, poster, brochure or pamphlet.
Story	Any written material or message about MAA, its members, MAA Staff, MAA Activities or other work or MAA Partners.

Our Commitment

MAA is committed to the capturing and Publication of Images and Stories of Local People from the communities in which we work, in strict compliance with the Australian Council for International Development's (ACFID) code of conduct and in a manner that respects the dignity, values, history, religion and culture of the people portrayed (**Commitment**).

MAA is also committed to being transparent in our work and accountable to our stakeholders and the broader community. In doing so, MAA strives to ensure that its stakeholders and the broader community are provided with relevant, timely and accurate information about the organisation that is ethically sourced and presented in an accessible format.

3 POLICY & PROCEDURES

3.1 GUIDING PRINCIPLES

There are inherent complexities in gaining consent from people in the context of aid and development. It is important that MAA and the MAA Partners are conscious of the power differences that people in communities may experience, and acknowledge possible vulnerabilities. MAA must provide enough information for any person from whom it is seeking consent in order that they are able to make a well-informed decision without experiencing duress or pressure. It can be helpful to provide people from whom MAA is seeking consent with examples of how a story or photo may be used, using visual aids wherever possible.

MAA's guiding ethical marketing and fundraising principles are simple, and in doing so, MAA will adhere to the following standards:

- 1) Fundraising activities carried out by MAA will comply with all relevant laws.
- 2) Any communications to the public made in the course of carrying out a fundraising activity shall be truthful and non-deceptive.
- 3) All monies raised via fundraising activities will be for the stated purpose of the appeal and will comply with the organisation's stated mission and purpose.
- 4) All personal information collected by MAA is confidential and is not for sale or to be given away or disclosed to any third party without consent. This is insured by:
 - a) Signed permission (informed consent) is obtained from the beneficiary to use their image or story, using the MAA Consent to Publish Beneficiaries' Stories or Images form attached to the present policy document.
 - b) Establish and record whether the subjects wish to be named or be identifiable and always act accordingly.
 - c) Remember that young children cannot give consent to the use of their photographs without assistance from a parent or caregiver. Obtaining a child's consent is not enough to justify putting a child at risk.
 - d) Rewards are not offered as an incentive to consent where the consent could indeed be compromising of the child.
 - e) In all cases, signed permission of both a child and his/her parent or guardian to use their image or story has been obtained.
 - f) In all our communications and where practical and reasonable within the need to reflect reality, we strive to choose images and related messages based on values of respect,

- equality, dignity and justice. The story or image must represent an accurate, dignified and balanced portrayal of the subject. This includes ensuring that stories or images depicting beneficiaries do portray them simply as victims. As much as possible reference should be made to their social, cultural and economic environment.
- g) Always avoid images and messages that potentially stereotype, sensationalize or discriminate against people, situations or places. We therefore avoid degrading, victimizing or shaming language and images; making inaccurate generalizations; discrimination of any kind; taking pictures out of context (try to provide informative caption).
 - h) Child protection issues are always at the forefront of any decision to publish an image of a child.
 - i) Children must be appropriately clothed in images and not in sexually provocative poses.
 - j) Beneficiaries give their own accounts as much as possible rather than others speaking on their behalf; highlight ability of people to take responsibility and action for themselves.
 - k) No personal or physical information to identify the location of a child or any information that could put them at risk is placed on the Website or other communication platforms.
 - l) If a photo might in any way hurt anyone or put them at risk, we delete it.
-
- 5) Nobody directly or indirectly employed by or volunteering for MAA shall accept commissions, bonuses or payments for fundraising activities on behalf of the organisation.
 - 6) No general solicitations shall be undertaken by telephone or door-to-door.
 - 7) Fundraising activities should not be undertaken if they may be detrimental to MAA's good name or community standing.
 - 8) Financial contributions will only be accepted from companies, organisations and individuals the Board considers ethical. Companies and organisations specifically excluded from making financial contributions to MAA include proscribed /gambling/tobacco/alcohol/prostitution entities, companies and/or organisations, and all other organisations involved in any illegal activity.
 - 9) MAA will not make statements about other NGO's with the intention of creating reputational or financial advantage for MAA.

4 ETHICAL DECISION-MAKING FRAMEWORK

As noted above, MAA is committed to ensuring our marketing and fundraising initiatives are conducted in an ethical manner. This includes capturing and publishing images and Stories of local people from the communities in which we work, in a manner that respects the dignity, values, history, religion and culture of the people portrayed.

Images and Stories about the people MAA works with play a vital role in helping MAA raising awareness about poverty and economic exclusion, bringing to life MAA's work to life and engaging supporters and the public.

All promotional material and communications must accurately reflect MAA's programmes, activities and mission. Text and Images should directly relate to the country, place, context and activities supported by MAA.

MAA's EDMF for communications explains how to make ethical decisions when creating and publishing Publications. It uses a framework of structured discussions at ethically important moments during the storytelling process to reduce the risks associated with storytelling and protect contributors. This EDMF sets out important questions and explains when these questions ought to be asked when capturing and publishing Images and Stories. It also explains who is responsible for having these discussions and what to do if a decision can't be made.

4.1 ETHICALLY IMPORTANT MOMENTS

While all ethical issues should be considered throughout the storytelling process, there are times when certain issues are more important. [Appendix A](#) contains seven key 'ethically important' moments during the storytelling and publishing process, accompanied by key issues to discuss at those times.

4.2 ETHICAL FRAMEWORK

MAA's EDMF is set out in [Appendix B](#), which presents five key ethical issues relevant for capturing and publishing its Images and Stories. These ethical issues should be discussed at the ethically important moments outlined above.

5 AVAILABILITY OF INFORMATION

5.1 INFORMATION THAT WILL BE SHARED

MAA will share all relevant information with its stakeholders, including MAA Partners and the broader community, unless there are good reasons why information cannot be disclosed. MAA will proactively publish information covering the following areas:

1. **Financial information:** MAA will ensure that summary and complete financial reports are made available to all stakeholders. It publishes summary financial statements in its Annual Report in accordance with guidelines set by the Australian Charities and Not-for-profit Commission (**ACNC**) and the Australian Council for International Development (**ACFID**), which will be posted on MAA's website. Full financial reports will be available on request.
2. **Governance Structure:** MAA shares information regarding our governance structure, legal status and organisational purpose.
3. **Work:** MAA disseminates information regarding its work and programs, including results and lessons to all stakeholders, including primary stakeholders, MAA Partners and donors. This may be through regular e- newsletters, as well as information published on MAA's website.
4. **Partnerships:** MAA shares information on formal partnerships with MAA Partners.
5. **Policies:** MAA shares its organisational policies and procedures relevant to external stakeholders on MAA's website.

5.2 INFORMATION THAT WILL NOT BE SHARED

MAA will not disclose information for the following reasons:

- **Privacy:** personal details and other information private to individuals will not be disclosed in accordance with MAA's Privacy Policy;
- **Confidential:** information that is subject to a legal, commercial or contractual obligation of confidence will not be disclosed;
- **Intellectual Property:** in some instances, MAA may not be able to share information as it will infringe on intellectual property rights or a third party;
- **Security:** MAA will not disclose information where we consider the disclosure could jeopardize our ability to operate or compromise the safety of our staff and that of our partners;
- **Harm to operations:** MAA will not disclose information that could damage or inhibit our operations or our work; and

- **Other:** MAA will not disclose information that solely relates to internal administration or operating systems that are not relevant for external stakeholders.

5.3 REQUESTING FURTHER INFORMATION

A request for information can be made by any of the following methods:

Term	Definition
Letter	Requests for information by letter should be addressed to: 87-89 Rookwood Road Yagoona NSW 2199 Australia
Email	Requests by email should be addressed to: compliance@maainternational.org.au
Telephone	Requests by phone can be made by calling: +61 2 8016 9500
Website	Requests can also be made through MAA's website: https://www.maainternational.org.au/contact-us

Upon receipt of any request for information, MAA will:

- Acknowledge the requester's request for information
- Confirm whether the information requested can be disclosed to the requester
- Collate the information and send to the requester (or inform the requester the reasons why the information cannot be disclosed)

6 GUIDELINES FOR THE DISTRIBUTION OF INFORMATION

Before the release or distribution of any public information to stakeholders or on any of MAA's public platforms (including its website or social media platforms) or any public presentation, the persons or people responsible for the despatch of that information must ensure that:

6.1 ACCURACY AND QUALITY OF INFORMATION

- (a) The statements made in the information (in particular statements in relation to specific projects, activities, funds raised or expended) are verifiable with respect to a primary source document (except for statements which are a matter of fact). For example, information in relation to outcomes of a project or programme should be verified against any project/programme reports submitted by the MAA Partner.
- (b) All other statements of intention, opinion, belief or aspiration by MAA are made on a reasonable basis and have been reviewed by the CEO.
- (c) Prior to the publication or distribution of any information to stakeholders and/or the public, the form and content of the information has been reviewed by the CEO or a person with delegated authority from the CEO.
- (d) Any statements made by another person or made on behalf of that other person appearing in the information is being disclosed in the information with the consent of that person.

6.2 TIMELINESS OF INFORMATION

- 1. Any updates to be provided to stakeholders are provided in a timely manner and contain the most up-to-date information available to MAA at the time of publication and/or distribution of that information.
- 2. Any major developments concerning MAA's projects, its activities or operations which are material from the point of view of a donor, member and/or supporter must be communicated to those persons promptly.

6.3 ACCESSIBLE

- (a) The information directed at donors, members or supporters is sent to them either electronically (via an email address provided) or physically (using a residential address provided).
- (b) The information for the general public is uploaded to one or more of MAA's online platforms, including its website or social media platform.

6.4 ETHICAL COMMUNICATIONS

- (a) In addition to the Requirements for the Portrayal of Local People set out above, MAA must also seek to uphold the privacy of its contributors and other stakeholders in preparing and distributing public communications. Therefore, any such public communications must comply with MAA's privacy policies.
- (b) MAA's public communications and communications with stakeholders must also abide by ACFID's commitment to principles of fairness and cooperation. Accordingly, MAA must not seek to make statements about other ACFID members with the intention of creating a reputational or other advantages to themselves.

7 REVISION HISTORY

Date of this release: 06 January 2023	Date of next revision: 05 January 2025
---------------------------------------	--

Revision Number	Revision Date	Summary of Changes	Changes Marked?
1.0	28 August 2012	Policy Written	N
2.0	02 February 2016	Minor changes made	N
3.0	04 March 2020	Changes to Guiding Principle	Y
3.1	18 Feb 2021	Changes to guiding principle	Y
3.2	15 Aug 2021	Changes to Policy Name and expansion of guiding principles	N
3.3	06 January 2023	Changes to grammatical errors	N

8 APPENDIX A

ETHICAL MOMENTS

Moment	Issues to Consider
When scoping a story	<ul style="list-style-type: none"> Connection to MAA's values and mission Protection of key figures Respectful and accurate portrayal
When planning to gather content	<ul style="list-style-type: none"> Informed consent Protection and privacy of key figures Respectful and accurate portrayal
While gathering content	<ul style="list-style-type: none"> Informed consent Connection to MAA's values and mission Protection and privacy of key figures Authorship and ownership Respectful and accurate portrayal
Directly after gathering content	<ul style="list-style-type: none"> Informed consent Protection of key figures
While creating the content	<ul style="list-style-type: none"> Connection to MAA's values and mission Protection of key figures Respectful and accurate portrayal Authorship and ownership
At Publication	<ul style="list-style-type: none"> Connection to MAA's values and mission Protection and privacy of key figures Respectful and accurate portrayal Informed consent Authorship and ownership
After Publication	<ul style="list-style-type: none"> Informed consent Authorship and ownership

9 APPENDIX B

ETHICAL FRAMEWORK

Ethical Issues	Questions to consider
<p>Connection to values</p>	<p><i>MAA's values</i></p> <ul style="list-style-type: none"> • Does the Image or Story uphold our value of integrity and honesty? • Does the Image or Story respect those with who we work? • Are we being transparent about our contribution? <p><i>Human rights</i></p> <ul style="list-style-type: none"> • Have we put the best interests of the key figure(s) first • Have we ensured we 'do no harm' to the key figure(s) during the storytelling process? • Have we treated the key figure(s) with dignity and fairness? • Have we respected the personal freedom and privacy of the key figure(s)? • Have we encouraged the key figure(s) to freely express their thoughts and feelings? • Have we given the key figure(s) control over how their identity and thoughts are portrayed in their story? • Have we ensured the content is accurate? <p><i>Children's rights</i></p> <ul style="list-style-type: none"> • 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? <p><i>Women's rights</i></p> <ul style="list-style-type: none"> • Have we carefully considered how women are portrayed? • Have we considered how sex-role stereotyping is portrayed? • Have we given voice to women?

	<ul style="list-style-type: none"> • Are we empowering girls and women through this story? • Have we considered the unique protection needs of women in this story? <p><i>Disability rights</i></p> <ul style="list-style-type: none"> • 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?
Protection	<p>MAA is committed to putting the wellbeing of its villagers and communities first. This is evident through its Safeguarding Policy, Gender Equality and Social Inclusion Policy and this Policy. In furtherance of this commitment, MAA should also consider in the Publication of any Image or Story:</p> <p><i>Protection of life</i></p> <ul style="list-style-type: none"> • Could the key figure(s)'s life be put at risk by sharing their story? • Do we know enough about the key figure(s)'s history to make a confident assessment of their safety? <p><i>Protection of health</i></p> <ul style="list-style-type: none"> • Could the key figure(s)'s health be put at risk by sharing their story? • Could the key figure(s)'s risk being cut off from important services by sharing their story? <p><i>Protection of dignity</i></p> <ul style="list-style-type: none"> • Could we be putting the key figure(s) or their community at risk of vilification or retribution by sharing their story? • Have we considered how the key figure(s)'s family, friends and community might feel about the storytelling project?
Informed consent	<p>As noted in this Policy, key figures must provide their informed consent to be captured in any Image or Story. Permission should be obtained in a way that is culturally appropriate and contextually</p>

sensitive. The following are considerations that arise when obtaining such consent / permission:

Correct information

- Have we provided all the necessary information to the key figure(s) so they can decide whether to consent to participate?
- Have we shown the key figure(s) 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 key figure(s)'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 key figure(s) fully understand the risks and opportunities associated with sharing and publishing their Image and Story?
- Have we given the key figure(s) 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 key figure(s) fully understands (including children), using the best-possible language?
- Is there a single point of contact for the key figure(s) to discuss the project and any consent issues? Is it easy for the key figure(s) to discuss the project with us?

Voluntary consent

- Is there a power imbalance between the key figure(s) 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 key figure(s)'s consent?
- If there is an element of duress, how can we address it?
- How can we ensure the key figure(s) can say 'no' to being involved in the storytelling project?

	<ul style="list-style-type: none"> • How can we ensure the key figure(s) can withdraw their consent at any time?
Privacy	<p>MAA values and upholds the privacy of its key figure(s). All staff, directors, partners and volunteers must abide by our privacy policies contained in our Organisational Policy. There are also context-related issues that arise in relation to privacy in the capture of Images and Stories:</p> <p><i>Protection</i></p> <ul style="list-style-type: none"> • Have we adequately protected the privacy of the key figure(s)? • Have we discussed how the key figure(s)'s story may expose them to the public? • If appropriate, have we adequately concealed the name, location and visual identity of the key figure(s)? <p><i>Information storage</i></p> <ul style="list-style-type: none"> • Have we safely and securely stored the key figure(s)'s personal information? • Does the key figure(s) understand how their personal information is stored and used? <p><i>Access to information</i></p> <ul style="list-style-type: none"> • Who has access to the key figure(s)'s information and are they aware of who can access it? • Have we explained how the key figure(s) can access their personal information, make amendments to their story and withdraw consent?
Authorship and ownership	<p>MAA respects the right of key figures to control their Stories. We also respect the right of contracted writers and photographers to moral ownership of their works. While MAA will abide by its privacy policies in its Organisational Policy, the following considerations should be had during the capture and Publication of Images and Stories:</p> <p><i>Authorship</i></p> <ul style="list-style-type: none"> • How will contributors and content creators be acknowledged when publishing their stories?

	<ul style="list-style-type: none">• 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? <p><i>Copyright</i></p> <ul style="list-style-type: none">• 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?
--	---