

Communication Minimum Standards for Partners

Purpose

The purpose of the Communication Minimum Standards is to ensure that NCA`s implementing partners adhere to the standards and regulations required of communication about NCA-funded actions. These are in place to reduce potential risks and/or harm to our operations, staff, rights holders, and partners while still ensuring that NCA-funded actions, work, and results get the visibility and transparency that is required by stakeholders.

The Communication Minimum Standards are taken from [NCA`s Communications Policy](#). (Approved by NCA Senior Management Team Nov. 2022)

Responsibilities

- **NCA Country / Area Directors** are responsible for communication activities about NCA-funded action within their country / region on a national level.
- **The implementing partner organisation that has signed a Project Agreement with NCA** is responsible for ensuring that their staff, volunteers, and / or contractors are aware of these Minimum Standards in their interactions with rights holders and in their communication / reporting work about NCA-funded action.

Communication Principles

Whenever NCA-funded action is communicated about, implementing partners should:

- raise up the voices of local communities and disaster victims and represent them with dignity and as transformative actors in their own lives and situations.
- highlight the capacities and aspirations, not just the vulnerabilities and fears, of disaster victims.
- find and convey firsthand accounts and examples of how NCA`s work has a direct impact on the welfare of people and is contributing to the further development of the community.
- base communication on first-hand observations, research and confirmed facts.
- promote peace, human rights, and good governance.
- seek to be open and honest about activities and operations.

NCA and other relevant funding agencies or donors that have financially supported the project / programme must always be mentioned in the communication according to their requirements, both written and verbally.

Information sharing

Implementing partners must not share information publicly that could jeopardise the safety of NCA`s staff, operations, rights holders, the integrity of NCA`s organisation, or harm NCA`s financial interests.

If the sharing of certain information in specific local situations will make NCA staff and/or the organisation vulnerable, the relevant NCA Country Director may request that the implementing partner not share the information for a specified period.

Informed Consent

- The implementing partner is responsible for ensuring that Informed Consent is given for any personal information that is collected as part of their communication work about NCA-funded actions.
 - Any personally identifiable information that can be attributed to a person, including photos and videos where individuals can be easily identified, is defined as "personal information."
 - This is first and foremost to respect rights holders` right to privacy and their own personal information, but also to enable NCA, or relevant funding agencies / donors, to share the communication material and deliverables with relevant stakeholders.
 - *All organisations operating in the EU must comply with the [General Data Protection Regulation \(GDPR\)](#) which is an important component of the EU`s privacy and human rights law.*
- **Verbal Informed Consent** is mandatory before any personal information is collected and **written Informed Consent should be obtained whenever possible** before taking any photos or videos.
 - The implementing partner can either use the "NCA Photo & Video Consent & Release Form" or their own version.

- It is highly recommended that consent forms are translated and made available in the local language/s.
- The signed forms should be scanned/taken a picture of and saved together with the image / video / interview whenever possible. When verbal Informed Consent is given, two implementing partner staff should be present as witnesses, if possible.

To obtain Informed Consent (either written or verbal), the collaborator/s (or the guardian / parent in the case of children) must:

1. know who the communicator / implementing partner is and what organisation/s they work for / represent.
2. understand that it is ok for them to say “no” to answering questions, being photographed and/or filmed and that they will not lose any rights or access to assistance or support if they do not want to participate and say no to the request.
3. know why they are being interviewed / filmed / photographed and what the general topics are that they will be asked to discuss / answer.
4. have a general understanding of how the communication material will be used and shared (where possible show examples). If the material has several purposes, the collaborator should be given the opportunity to give consent to parts of the processing (i.e., can convey their history but not depicted in an identifiable way).
5. understand that they have the right to access their personal information, photos, and videos of them that are submitted to NCA, ask us to rectify information, and / or request us to delete them at any time on the NCA website or by emailing donor@nca.no.
6. be 18 years of age to agree and sign a consent form. If under the age of 18, consent should be obtained from a parent/guardian.
7. be mentally capable of consenting.
8. **sign the “NCA Photo & Video Consent & Release Form” (or equivalent form) after all the above has been presented** and the content of the Form has been explained to them at a level and in a language they understand.

When photographing or filming a group of people, every person should be given the opportunity to say “no” to being photographed. In group settings, such as a training, one signed Consent Form from the trainer / leader / organizer will suffice after every collaborator has given verbal consent.

In certain cases, Informed Consent is not required. This includes photos of the implementing partner`s staff members, advisory groups, public figures in public, crowds in a public setting, or collaborators in public events or programmes (i.e., at conferences).

In other cases, **it is not possible to obtain Informed Consent**, for example people escaping emergencies or a group of people photographed from a distance.

Note:

- Implementing partners must be mindful that **those giving consent may not fully understand** the possible impact of their image / identifying details being published, or the reach of the internet / social media.
 - Often, “gatekeepers” may seek to provide consent on behalf of people, or when there is a language barrier someone may answer on behalf of the collaborator without informing or asking them, and power imbalances like this may make people with less power implicitly pressured to agree.
 - Communication needs are never a higher priority than someone’s safety and dignity.

Sensitive Communications

In many societies where NCA works, there are still topics that are “taboo” or highly sensitive. Cultural, religious and / or traditional beliefs stigmatise many and, in this context, confidentiality is essential for many people who will only share their stories under specific circumstances (“survivors”).

- While conducting communication activities, implementing partners must **always put the survivor’s best interests over any other perceived need and / or potential benefit.**
 - This includes their right to privacy, confidentiality, dignity, respect, safety, security, and protection from harm and/or retribution against them or their families.
- Asking a survivor to recount traumatising events can cause further distress and **should be done only when essential for communication needs and in collaboration with relevant staff to ensure safety and support can be provided** (i.e., GBV staff).
 - Someone should also be present who has **information about services or referral network** should the person experience a crisis or request support during the interview.
 - As much as possible for sensitive issues, **women should be interviewed by other women** and interpreters should also be women.
- Obtaining **written Informed Consent** is essential when documenting or communicating about a traumatised or stigmatised person, or a person living with HIV, and/or a person that will be identified in relation to sensitive health behaviour (i.e., was/is trafficked as a sex worker, use of alcohol or illegal drugs, sexual orientation, etc.) and/or was/is involved in criminal behaviour either as perpetrator or survivor (i.e., sexual or physical abuse).
- **We conceal the identity of survivors and do not use their real names when communicating about them to external audiences or report details that could put them at further risk** (i.e., locations, date of incident, physical characteristics, sometimes even the names of those helping), and if we photograph or film them, we do so in a way that does not make them identifiable.
 - Be mindful that even when we do not show a survivor`s face, their voice, clothing, or background can also be used to identify them.

- On occasion, survivors can be identifiable and /or include their real name if they wish and the relevant Project / Programme Manager from the implementing partner agrees that there is no further risk. In these cases, written Informed Consent is mandatory.

Child safeguarding

- In our communication work, **good reasons must always be provided for capturing and using images of children** and children's information when they are younger than 18 years old.
- All photographs, films and when extensive reporting is made of a child, and the child's face or name is visually identifiable **must have parental or guardian written Informed Consent.**
 - Ideally this consent should be obtained from parents/guardians **before** speaking with or taking pictures / filming children. This includes when photographing a group of children.
 - Where photos or videos that include children are taken and Informed Consent cannot reasonably be obtained, children should not be identifiable through the accompanying information.
- **A child should not be identified with their full name in public information**, although their name should be included with any written permissions.
- **No individual staff member representing the implementing partner should be left alone with a child at any time** while speaking with or photographing / filming them without their parent / guardian present.
- When capturing visual material, **children must always be adequately clothed and presented in a dignified and respectful manner** and not in a vulnerable or submissive manner.
 - Any photos of children that may be regarded as inappropriate must be discarded and deleted immediately.
- **NCA does not publish any interviews/photos/recordings of child Gender Based Violence (GBV) survivors where they are identifiable as survivors under any circumstance** (even with Informed Consent).
- **Feedback and complaints mechanisms should be customised** / explained in a manner so that children can also use them.

Photos & videos

The progress, results and impact of NCA-financed actions and related events must, where relevant and possible, always be documented by photographs or videos for use in communications and reporting.

To ensure that photos and videos can be used for their intended communication / reporting purpose, they should:

- **always respect human dignity and ensure the rights, safety, and wellbeing of the person or people being portrayed.**
- **be culturally and politically sensitive**, adhere to local / national guidelines and rules, and avoid social stigmatisation of individuals.
- **protect the identity and privacy** of those that are identifiable in the photo / video unless the required Informed Consent has been given by the individual/s with full understanding of usage.
 - Make sure to properly conceal identities of survivors, unless you written Informed Consent from them and the approval from the relevant Project / Programme Manager there is no further risk.
 - Make sure pictures of children where they are identifiable are appropriate, their full name is not disclosed, and the necessary written Informed Consent has been given.
- **be used ethically**, which means that they should have the necessary Informed Consent and be accurate in terms of representation, captioning, and used in the correct context.
 - The photo / film should be an authentic representation of who the collaborator is and what their life is like (it must clearly state if the image is a re-enactment or illustration).
- **be accompanied by a caption** that mentions as much of the following information as possible:
 - the name of the photographer/ videographer
 - the date the photo / film was taken
 - the location / place of production
 - a brief description of what the image / video depicts
 - names and functions of identifiable individuals that have given Informed Consent.
 - If Informed Consent was not able to be obtained, this should be stated.
- **have prior approval from the relevant NCA Country Director** before being shared externally if taken in a **high security risk area.**
- never include government establishments, military camps and military personnel unless it / they are directly part of programming and prior relationships / approvals are in place.

Videos or other visual productions created about NCA-financed actions should always be approved by the relevant NCA Country Director or the Communications Division at the Head Office before they are screened, broadcast, or distributed to external audiences. Implementing partners must ensure that **all video productions are made available to NCA together** with all information relating to the broadcast, distribution, and intended reach.

Contractors are not allowed to interview or take photos / videos of rights holders at any NCA-funded actions, unless this is specified in their agreement with NCA (i.e. freelance journalists or photographers).

Local communities

NCA's reputation depends on strong accountability measures towards the communities and rights holders we work with and for.

- The Implementing Partner should aim to **promote the voices of staff, leaders, and other members from local communities**, with their Informed Consent, on issues that directly affect them.
- When communicating locally, implementing partners should, together with the participation of local members, **identify the relevant tools and media to ensure the information is understandable and can reach the most vulnerable**.

In accord with its certification under the Core Humanitarian Standard ("CHS"), NCA and its partners need to ensure that all communities that we work to help, especially those that are crisis-affected, are properly informed at all stages of a project.

Local communities must receive timely, relevant, and clear communication about:

- who we are, our motive / objective, and our activities,
- what we are there to do, information about the project / response, how long we plan to be there, and what the implementation process will look like,
- the level of support they can expect to receive during an intervention.
- project budgets and funding sources,
- the distribution of goods / services and the selection criteria,
- how they can participate in the development and humanitarian work of NCA (if relevant),
- how NCA staff and NCA partner staff are expected to behave,
- what communities can give feedback or complaints on, and how to do so, and
- two channels (minimum) for giving feedback, depending on what communication options exist in each location.

Implementing partners must ensure that the above information is **available in languages and media accessible to the local community and available to rights holders, host communities, partners, and other stakeholders**.

Crisis communication

- In the event of a crisis or emergency where our rights holders, staff, partners, or operations are impacted, implementing **partners may be requested to refrain from commenting or posting about the situation on social media or in the press depending on the nature of the crisis**.
- Security issues or local political sensitivities may make it preferable or necessary to limit communication and visibility activities in certain countries or areas (i.e., crisis or conflict zones) or during certain periods (i.e., elections). In such cases, **how to communicate about NCA-funded actions externally will be determined on a case-by-case basis by the NCA Country Director**.

Field visits and reporting

- Implementing partners are expected to **comply with and facilitate the required field visits from NCA and other relevant donor agencies**. Prior to these visits, the implementing partner may be asked to work with the local community to ensure any necessary Informed Consent is in place.
- The implementing partner is required to **submit regular reports to NCA each year**, which require the collection and handling of personal information to document the project's progress, results and impact on the local community (reference is made to the Partner Project Agreement Template).

Capacity Building

- Implementing partners should **be open to participating in communication skills training**, if such capacity building is offered by the relevant NCA Country Office. This is to help ensure that the implementing partner can more readily meet visibility and communication requirements from NCA, donors / funding agencies, and other stakeholders.