

NCA`S COMMUNICATION POLICY



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ABOUT THE POLICY

Purpose

The overall goal for Norwegian Church Aid`s (“NCA”) communication work is to support, strengthen and better enable our mission as detailed in the Global Strategy “Faith in Action.” The purpose of this Policy is to ensure that all communication work about NCA-funded action is consistent with other NCA communication activities around the world and complies with the communication principles and guidelines set by NCA`s Senior Management Team.

This Policy also aims to ensure that all of NCA`s communication work is in line with the standards and regulations required by the ACT Alliance, NCA`s Protection from Sexual Harassment, Exploitation and Abuse (PSHEA), and Child Safeguarding (CS) Policy, Charter for Change, The Personal Data Act, the EU General Data Protection Regulation (GDPR), Core Humanitarian Standards (CHS), the “Do No Harm Approach”, The Copyright Act, and the Code of Conduct for The International Red Cross and Red Crescent Movement and NGOs in Disaster Relief.

Definitions

In this Policy, “**communication**” / “**communicating**” is defined as the deliverables, systems and processes used to share or convey information via various media, materials and activities occurring across all parts and levels of NCA, to both internal and external stakeholders.

“**Implementing partner**” is a blanket term referring to all NCA staff across all office locations, humanitarian responses, joint country programme/office staff, contractors, partner organisations, and freelancers that are involved in communication work about partly or wholly NCA-funded actions.

“**NCA photo or video**” is defined as a picture or video that is taken of NCA-funded actions / work, or a picture or video taken during an NCA-funded trip.

“**The collaborator**” is defined as the individual/s that are identifiable in the photo or video.

Scope, implementation, and responsibilities

• **Scope:** this Policy constitutes our normative framework and applies to all implementing partners whenever they are communicating about NCA, NCA-funded actions, the need for NCA-funded actions, and/or when they are identified as / associated with NCA to external audiences (this includes beneficiaries).

• **Implementation:** NCA commits to distributing the Policy throughout the organisation and on the NCA website, and to implementing partners with whom we have Partnership Agreements with.

• **Responsibilities:**

- **NCA`s Director of Communications & Politics** has the overall responsibility for all NCA`s communication and advocacy work.
- **The Communications Department** has the overall responsibility for NCA`s Policy. The Department is also responsible for distribution, for building awareness and for clarifying roles and responsibilities.
- **Country / Area Directors** are responsible for communication activities within their country / region on a national level.
- **Heads of Departments at the Head Office** are responsible for communication activities within the mandate of their department and relevant stakeholders.
- **Managers** with responsibility for programmes, projects, or other staff must ensure the implementation of the policy in their unit.
- **NCA staff** are responsible for familiarising themselves with the Policy and adhering to it for the duration of their employment with NCA.

COMMUNICATION PRINCIPLES

At the core of all communication about NCA funded work, the following principles must be reflected.

All NCA`s communication activities should:

• Show respect and dignity for the people with whom we work.

- We 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.
- We highlight the capacities and aspirations, not just the vulnerabilities and fears, of disaster victims.
- We are present to witness and document the need for NCA-funded action, what that action looks like, and how it impacts the lives of people.

• Be informative and inspirational.

- We inform, educate, and raise awareness about NCA`s work, vision, and priorities.
- We 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 development of the countries that we work in.

• Be understandable, accessible, and timely.

- We use clear, concise, and plain language that can be understood by as broad an audience as possible.
- We identify and use the most effective and strategic communication channels available to reach the intended audience.
- We work to find opportunities that can provide maximum visibility for NCA to help secure recognition and support from important stakeholders.

• Be credible, balanced, and trusted.

- We base communication on first-hand observations, research and confirmed facts.
- We promote peace, human rights, and good governance.
- We seek to be open and honest about our activities and operations.

APPROVAL PROCESS

To ensure accuracy and a consistent high quality across all external communication deliverables, NCA requires that multiple approvers are involved in the approval process. This is to help guarantee that:

- the information presented is accurate and up to date,
- our organisations, beneficiaries, partners, staff, and stakeholders are protected from any potential risks (i.e., safety, reputational),
- the deliverable is in line with the relevant country office's communication priorities and NCA's overall Communication Strategy,
- the deliverable meets the quality standard required across NCA, which includes adhering to our Design Manual and Communication Principles (see "Communication Principles" section).

The person presenting a communication deliverable ("the submitter") is responsible for ensuring that the necessary approvals have been given.

The following approval process should be followed at NCA for all external communication:

- Direct quotes must be approved by the individual being cited to confirm that what they said is being used in the correct context.
- Relevant thematic advisors and / or Safety &

Access focal points should be involved as approvers for sensitive communications (see “Sensitive Communications” section).

- Check the reliability of your references and make sure to find the original source of the data / information. Just because it’s online doesn’t mean it’s accurate.
- The relevant funding agency or donor that has financially supported the project / programme should be mentioned in the deliverable. Bear in mind that they may require prior approval before publication / submission.
- For deliverables to the international media and publications / communication channels with widespread reach, the Head Office Communications Division should be included as an approver. Films or videos that are intended for external audiences outside of your country should also be approved by the Communications Division.
- As long as NCA’s Design Manual is adhered to, you do not need approval from the Head Office on layouts and visual formatting. When a deliverable deviates from these standards, you will need special approval from the Head Office Communications Division.
- The final sign-off approval belongs to the individual who is responsible for communication within NCA for the relevant country. This is the Country Director for Country Offices, and the Head of Communications at the Head Office.

INFORMATION SHARING

NCA is committed to being accountable to the people we serve, our staff, partners, the authorities, our supporters, and donors, as well as the public. Transparency is a prerequisite for accountability and this Policy is based on the premise that all information will be publicly disclosed. Non-disclosure must be based on well-founded and predefined reasons thus this Policy also outlines what information we do not share, and why.

What we will make public:

- Overarching governing documents.
- Financial information – yearly financial statements and related audit reports.
- Mechanisms by which stakeholders, including children, can give feedback and make complaints.
- Annual reports about our work and results.
- Organisational chart and key contact details.
- Programme information – core competencies and information about what programmes we run in which countries.
- Overview of our major donors.
- Selected strategies – such as the Global Strategy.
- Selected contracts, Partnership Agreements and Memorandums of Understanding – upon request.
- General information on closed misconduct cases.

What we will not make public:

- Any information that could jeopardise the safety of our staff, the privacy of the people we serve, our ability to deliver aid, the integrity of our organisation, or if it harms our financial interests.
- Intellectual property or other information disclosed or



provided to NCA under obligation of confidentiality, or which is subject to legal disclosure restrictions.

- Legal advice and matters in dispute or under negotiation, including disciplinary and investigative information generated in or for NCA, such as breach of contracts, corruption, etc.
- Information dealing entirely with internal administration, operating systems, or internal reviews.
- Technical and thematic procedures, handbooks, standards, and position papers.
- Selected contracts, Partnership Agreements and Memorandums of Understanding – when there is a non-disclosure clause or when disclosure will harm our financial interests or may entail safety and security risks.

The NCA Senior Management Team at the Head Office may approve a temporary exception to the above criteria in situations of insecurity, threat and vulnerability to the organisation, our staff, or partners. NCA recognises that information can be used against us and as such we retain the right to exercise our judgement as to whether to disclose information or not if its disclosure would encourage malicious attacks.

If the sharing of certain information in specific local situations will make staff and/or the organisation vulnerable, the relevant Country Director may choose not to share the information for a specified period. It is also the Country Director`s responsibility to pay attention to local legal obligations that affect information disclosure as these may require additional, or preclude, disclosures.

HANDLING PERSONAL INFORMATION

All implementing partners must handle personal information acquired through our communication work about NCA-funded action in accordance with the EU Data Protection Directive 95/46 (“GDPR”) and data protection legislation in the country where the data processing takes place. When EU and local legislation conflicts, NCA shall always comply with the strictest regulation.

You will inevitably be involved in handling personal data as part of your work when communicating about beneficiaries and local communities as you will be required to obtain a certain amount of personal information to validate your reporting. Any personally identifiable information that can be attributed to a person is subject to GDPR rules. This includes photos and videos where individuals are easily identifiable, either visually or by including their name, and any other personal information, in the text.

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

In addition, communication activities in the humanitarian industry often require the collection of personal data that is highly sensitive in nature. This can include information or photos of survivors of gender-based violence (“GBV”), names of staff or partners in high-risk areas, addresses and contact information used when planning a media visit, and much more. Handling sensitive personal data correctly in line with these guidelines is critical.

Those that we collect information from, be it our staff or beneficiaries in local communities where we work, have the right to access the personal data that we have stored about them, ask us to rectify that information, and / or request us to delete it. They can do this at any time on the NCA website and this should be communicated whenever we obtain “informed consent.”

We should ideally obtain “Informed Consent” before we start collecting any personal information (see “Informed Consent” section). You should only collect personal data for a specific purpose, collect only the data you need, and only

store that data for as long as necessary to complete that purpose. A routine for checking and deleting personal data, which can include photos and videos, that no longer serves its intended purpose should happen regularly and this is the responsibility of the implementing partner that collected the personal data.

Personal data must be stored and shared from a secure location where you are able to manage and see who has access to it. For NCA staff, this should be in your NCA OneDrive that only you have access to and that is within NCA`s network where Multi-Factor Authentication is required. Attaching files, content and information in emails should be avoided as a rule, but, when necessary, make sure to secure the attachment that contains personal data with a password.

Personal data may only be shared on NCA`s external platforms or accounts when the appropriate Informed Consent has been acquired. Individuals can withdraw their consent at any time and can request the removal of their personal data from any of our digital external accounts or platforms. Personal data that was shared with the media or in a printed publication cannot be fully deleted / removed, but in these cases NCA will do what it can to help stop the further spread / sharing of the personal data.

NCA stores the historical photos in the organisation`s digital photo archive that are deemed important for safeguarding and for documenting NCA`s previous results and history (these are marked as "Historical image"). Any photographs that do not have the required informed consent should note in the caption: "Informed consent not obtained." Only a limited number of people have access to NCA`s main photo archive and access to the archive must be approved by the Head of Communications on a case-by-case basis when it is evident that the individual needs access to perform their work at NCA.

INFORMED CONSENT

The burden is on the implementing partner to ensure that Informed Consent has been given by the collaborator/s before collecting any personal data about individuals in their communication work about NCA-financed actions.

Verbal informed consent is mandatory before any personal data is collected and written informed consent should be obtained whenever possible before taking any photos or videos. When verbal informed consent is given, two implementing partners should be present as witnesses. There should always be a clearly formulated purpose when acquiring communication material so that implementing partners can explain to potential collaborators why they are being interviewed / filmed / photographed and how the communication material will be used.

To obtain Informed Consent, the collaborator/s (or the guardian / parent in the case of children) should:

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 to see what personal information, photos, and videos that we have about them, ask us to rectify information, and / or request us to delete it at any time on the NCA website or



by emailing giverservice@nca.no.

6. be mentally capable of consenting.

7. For photos and videos: the collaborator/s should be asked to sign the “**NCA Photo & Video Consent & Release Form**” after all the above has been presented and the content of the Form has been explained to them at a level they understand.

All signed “NCA Photo & Video Consent & Release Forms” should be scanned / taken a picture of and saved together with the image / video / interview where at all possible. This is the responsibility of the implementing partner.

Any quotes from the collaborator that may be included in the reporting / communication should also be checked and approved by them.

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. “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.

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 some circumstances, it is not possible to obtain informed consent, for example people escaping emergencies or a group of people photographed from a distance.

In certain cases, informed consent is not required. This includes photos of NCA governance, advisory groups, or members of staff, public figures in public, crowds in a public setting, or collaborators in public events or programmes. These fall under the “legitimate interest” clause of GDPR.

DEALING WITH 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.

While conducting communication activities, we must always put the survivor’s best interests over any other perceived need and / or potential benefit both in how we obtain the information and how we communicate their story as this is an important aspect of NCA’s obligation to “do no harm.” This includes their right to privacy, confidentiality, dignity, respect, safety, security, and protection from harm and/or retribution against them or their families.

Advisors at your NCA office that work with the relevant sensitive thematic programme / subject matter, are trained on the “do no harm approach,” or are responsible for Safety & Access in a high-risk area should be consulted before the communication activities involve beneficiaries.

Asking a survivor to recount traumatising events can cause further distress. This should be done only when essential for communication needs and in collaboration with relevant staff (i.e., GBV staff) to ensure safety and support can be provided. 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. If no such services or support are available, then the interview should not be conducted. As much as possible for sensitive issues, women should be interviewed by other women and interpreters should also be women.

Obtaining written informed consent, not just verbal 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 do not use the collaborator's 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 collaborator'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 NCA focal point agrees that there is no further risk. In these cases, written consent is mandatory.

There are high safety and security risks in many of the areas where we work. We must never jeopardise the safety of our staff, partners, beneficiaries, or NCA's reputation in our communication work. If communicating about NCA-funded activity in a high-risk location, approval should be given before publishing / sharing externally by the relevant Country Director, or the relevant Safety & Access focal point.

Remember to always consider the contextual variations in each country that we work in. 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 Country Director in consultation and agreement with the relevant Safety & Access Officer, and the Communications Division at the Head Office when necessary.

CHILD SAFEGUARDING

Due to the nature of our work, NCA's implementing partners work with some of the most vulnerable children all over the world and all implementing partners must behave appropriately towards children and adhere to NCA's Protection from Sexual Harassment, Exploitation and Abuse (PSHEA), and Child Safeguarding (CS) Policy.

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. Ideally informed consent should always be obtained from parents/guardians before speaking with or taking pictures / filming children. All photographs, films and when extensive reporting is made of a child, and the child's face or name is visually identifiable should have parental or guardian written informed consent.

A child should not be identified with their full name in public information, although their name should be included with any written permissions. Where photos or videos that include children are taken where informed consent cannot reasonably be obtained, children should in these cases not be identifiable through the accompanying information.

Only individuals that have been appropriately screened by the relevant Country Office may engage with, interview or photograph / film children while representing NCA. No individual staff member representing NCA 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 presented in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive. 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 GBV (Gender Based Violence) survivors where they are identifiable as survivors under any circumstance.

Informed consent should also be given before photographing a group of children and ideally consent should be secured in advance of the trip (see “Informed Consent” section).

Feedback and complaints mechanisms should be customised / explained in a manner so that children can also use them.

LOCAL COMMUNITIES

NCA’s reputation depends on strong accountability measures towards the communities and beneficiaries we work with and for, and these communities constitute an audience that requires dedicated communications.

NCA will aim to promote the voices of staff, leaders, and other members from local communities, with their informed consent, on issues that directly affect them. This is in preference to others speaking as experts on their behalf unless local voices of authority are unavailable. It is also preferable that the authors of articles and reports about the people we aim to assist be members of those communities themselves and write pertaining to their own experience. This is also an opportunity for them to report to us on how we can improve our work.

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 is committed to ensuring that all communities that we work to help, especially those that are crisis-affected, are properly informed at all stages of a project. Implementing partners must ensure that this information is available in languages and media accessible to the local community and that the below listed information is available to beneficiaries, host communities, partners, and other stakeholders.

Local communities must have access to timely, relevant, and clear information 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 in the field,
- 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.

SOCIAL MEDIA

NCA has a separate “Social Media Policy” for implementing partners to help limit associated risks to NCA.

Whenever an implementing partner posts something on social media, even if they do it on personal accounts outside of working hours, there is a risk that:

- it can damage the reputation and credibility of NCA towards our partners, local authorities, beneficiaries, donors, other stakeholders, and the public.
- it can jeopardize the safety and security of other NCA employees or partners and our operations / programmes.
- it can reveal an implementing partner’s inability / reduced ability to perform their duties.
- it can constitute a breach of the ACT Code of Conduct or an employee’s Contract of Employment with NCA.

All implementing partners are required to sign their acceptance of the Social Media Policy when they start working with NCA, will travel with NCA, or start / sign a Partner Project Agreement with NCA.

MEDIA RELATIONS

As part of NCA’s commitment to transparency and accountability, the media is an important tool and communication channel for relaying information to our beneficiaries, supporters, donors, and the public so NCA therefore aims to cooperate with the media in a professional and strategic manner. Just as a positive report can improve NCA’s reputation and support our work, a negative report can damage NCA’s reputation or cause challenges and safety risks for our beneficiaries, staff, partners, or operations. This policy therefore includes guidelines to direct NCA’s work with the media across all office locations.

NCA will not allow external or internal demands for publicity to take precedence over the principle of maximising overall relief assistance. We will avoid competing with other disaster response agencies for media coverage in situations where such coverage may be to the detriment of the service provided to the beneficiaries or to the security of our staff or the beneficiaries.

All media requests should be approved by the relevant Country Director at our Country Offices, and the Head of Department or the Communications Division at the Head Office before any NCA staff agree to participate in an interview or give comments to a reporter.

National and regional media are important means by which NCA’s implementing partners gain publicity in their country. The NCA Head Office is unable to write for these media, but will help with communications and visibility planning, background information, quotes, photos, and contacts, when necessary, to help Country Offices gain local media traction.

All contact with international media should be reported to the Communications Division at Head Office as soon as possible.

NCA’s guidelines for working with journalists (when you have been approved to do so) are the following:

1. Inform and motivate donors, partners, policy makers and the public about NCA’s work and about issues



related to global poverty and injustice.

2. Represent and give a voice to the communities with whom NCA works and raise awareness of their challenges and NCA`s efforts to support them.
3. Do your research beforehand so you have confirmed facts and information you can give them and that makes you a useful resource to them.
4. Always be professional, polite, and adhere to NCA`s Communication Principles as you are communicating on behalf of NCA.
5. Maintain good relations. Just as we work closely with donors and partners, we do the same with journalists.
6. Remember that anything you say to a reporter is on record.

If unsure about what to do, give the journalist the details for NCA`s Head Office Press Team (press@nca.no, +4793242493), or pass on the journalist`s contact information to the Press Team or to the relevant Country Director so they can get back to them in the correct way.

PHOTOS & VIDEOS

NCA recognizes that photos and videos are important tools in documenting our work and an essential part of our communication work. 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. This policy therefore includes guidelines for how implementing partners should collect, handle, or share visual material.

NCA photos and videos can be used by NCA`s implementing partners in reports, presentations, media initiatives and publications, provided the intent is non-commercial and this Policy is adhered to.

Stories, photos, and films that are collected by implementing partners during an NCA-funded action or trip can be used for personal communications (including social media or other public channels), as long as this Policy and NCA`s "Social Media Policy" are adhered to.

All photos and videos published or disseminated by NCA must:

- adhere to NCA`s Communications Principles and 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 consent has been given by the individual/s with full understanding of usage.
- be used ethically, which means that they should be accurate in terms of content, 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 (*"Photographer / videographer Name/Norwegian Church Aid"*)
 - 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.
- ideally not be older than 2 years when being used for promotional purposes as our communication work should be as accurate as possible.

Handling NCA photos and video

For all photos and films that are intended to be used, published, or disseminated by NCA, "Informed Consent" (detailed in this Policy) must be obtained from the collaborators/s portrayed and the rules for "Handling Personal Information" (detailed in this Policy) must also be adhered to whenever individuals can be easily identified.

When collecting visual material, the implementing partner must be aware that different traditions and cultures have varying views on being depicted / photographed. The burden is on the implementing partner to make themselves acquainted with the specific context and proceed with care. NCA`s Advisors that work with the relevant thematic topic or regional area, or the relevant Country Director, should be consulted beforehand if the photographer is not familiar with the region, customs, or culture of the area that they will be working in.

In an area that has high safety and access risks, prior approval must be given by the relevant Country Director. Government establishments, military camps and military personnel as a rule should not be photographed unless

it / they are directly part of programming and prior relationships / approvals are in place.

Videos or other visual productions created by 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 such video productions are made available to NCA together with all information relating to the broadcast, distribution, and intended reach.

Use of visual material from other sources

NCA`s implementing partners may acquire / purchase photos and videos from external sources (i.e., ACT Alliance`s Photo Archive). Purchased / obtained images from other sources must be used carefully as they may have been obtained in a different context and under different rules than those we use.

NCA must ensure it is legally permitted to publish images it uploads to its website, social media accounts, and elsewhere. This responsibility sits with each implementing partner and ultimately with the relevant Country Director and with the Head of Communications at the Head Office.

Copyright

All NCA photos are copyrighted and may not be used as stock photography. NCA is entitled to use or reproduce all visual and photographic material produced using NCA funding. Any copyright of work done by NCA staff in the course of their official duties shall be vested in NCA, unless otherwise agreed.

If the photographer / videographer is not an NCA implementing partner, they have the copyright of, and commercial right to, the photo / video, unless otherwise specified in their contract / agreement with NCA. If, however, the work was under a 'work for hire' contract, the photographer / videographer transfers copyright to the agency that paid them.

Freelance photographers can also license images to NCA for a period or for a certain use, or an unrestricted perpetuity license if both parties agree.

CRISIS COMMUNICATION

In the event of a crisis or emergency where our beneficiaries, staff, partners, or operations are impacted, the need to communicate is essential. Target audiences in an emergency can include local communities and beneficiaries, our partners, other aid organisations, our own staff and their families / emergency contacts, donors, news media and the public at large. What needs to be said, when and how depends on each audience group and the nature of the crisis / emergency.

Implementing Partners must maintain open communication with the relevant NCA Country Office, and NCA Country Offices must maintain communication with the Head Office during an emergency. NCA will normally appoint one spokesperson to address the media on behalf of the organisation. Depending on the nature of the crisis, implementing partners may be requested to refrain from commenting or posting about the situation on social media or in the press.

Any contact with the media and any official NCA communication, response or statement must be approved by the relevant Country Director or NCA's Director of Communications & Politics at the Head Office. If a Crisis Management Team has been established at the Head Office, the Crisis Manager is responsible for approving internal and external communications during a crisis (see ["Head Office Safety Crisis Management Plan"](#)).

POLICY REVIEW AND ENFORCEMENT

This Policy will be reviewed every 5 years. If there are any significant or contextual changes, the Policy may be reviewed more frequently.

Any breaches or suspected breaches of this Policy should be dealt with as quickly as possible. The relevant Country Director or Head of Department is responsible for their staff / partners, and any issues should be addressed to them first. Depending on the seriousness of the breach, or if Country Director / Head of Department is not able to resolve the matter with their staff member / implementing partner, the breach should be reported using NCA's Complaints Handling Mechanism.

Save lives: We will work to create safe and resilient communities to protect and save the lives of people living in extreme poverty, fragility, and emergencies.

Seek justice: We will work to create inclusive and just societies to secure and fulfil the human rights of people living with inequality, insecurity, and oppression. We envision communities where people are active participants in their own development and organise themselves to claim their rights.

Norwegian Church Aid's Global Strategy "Faith in Action"



NORWEGIAN CHURCH AID
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