

Review of the Code of Conduct on Images and Messages (2010 - 2012)

Draft Report for Dóchas Board

5th March 2012

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“If an organisation repeatedly does not follow the code then they should not be supported by Dóchas as signatories to the code - what's the point in having a Code of Conduct if the code cannot be implemented and defaulters penalised?” (Workshop 3)

Managment need to ensure “that the organistaion modifies its communications and advertising in order to be code complaint”. (Workshop 3)

Key Findings from the Review

The review process indicated a significant level of interest in strengthening the Dóchas Code of Conduct on Images and Messages (the code) within the Irish international development sector. In light of the aim and objectives of the review (see section 2), the Dóchas task group decided to organise a meaningful process of dialogue and reflection on the code through a series of workshops in order to: assess whether the code's principles remained relevant and appropriate; devise indicators for assessing code compliance and to develop illustrative guidelines on practice; and identify suggestions and recommendations on implementation and monitoring mechanisms to ensure compliance with the principles of the code.

The review signalled overall support for the **Principles** as set out in the code. The need for further investigation of child protection guidelines in relation to code implementation was highlighted at the consultation meeting. There was significant criticism that existing principles are vague and open to interpretation, accompanied by concerns that the code (and by implication, indicators of code compliance) should not become a 'ticking box' exercise. With this in mind, the Dóchas task group determined that **Indicators** of code compliance would form the basis of the illustrative guide, and that the principles of the code should be reviewed in 2015.

With regard to **Good Practice and Implementation Support Mechanisms**, the most significant finding was the need for management ownership of, commitment to and 'buy-in' in relation to the code of conduct. Managers need to identify ways to ensure code ownership with the organisation, and to consider the implications of this for field or head offices in other countries. Organisational ownership involves training at all levels and the promotion of code champions, but they need to be supported with cross-organisational reflection on the code and its implementation at organisational level. The need for fundraisers to be supported to engage more fully with the code was highlighted as important for organisational ownership of the code as was the need to include more 'Southern' and 'marginalized' voices in any consideration of code implementation.

With regard to **Monitoring and Review Mechanisms**, overall, participants favoured the idea of adding additional questions to the existing Dóchas annual questionnaire as a means of self-assessment. Based on the Australian PQASSO/ACFID scoring system, which encourages organisations to focus on what they are doing well and on how they can improve, this would appear to be the most favoured way to encourage self-reflection in order to lead to stronger practice in the area. With this in mind, it is important that management are involved in the questionnaire process and that there is a system of dialogue put in place on questionnaires in order to acknowledge good practice and encourage improvement. The need to strengthen the minimum criteria regarding code compliance was identified as a significant measure which could lead to improvement in code implementation. There was also a call to strengthen the existing feedback mechanism.

Of the three **Reward Mechanisms** discussed throughout the review process, the only one receiving any detailed attention was that of an annual award, but this needs further exploration.

Dóchas are regarded as having a central role to play in encouraging and supporting signatory organisations to strengthen their implementation of the code, as indicated in the review recommendations. Current Dóchas support for the code was complimented but the Dóchas board and secretariat are encouraged to do more, albeit with limited resources. Many of the recommendations highlighted here relate to systems which can be implemented within organisations and across the sector, with few additional financial implications.

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“It is a weak code lacking the power of enforcement.” (Workshop 2 - Limerick)

1. Introduction to the Review of the Code of Conduct on Images and Messages (2011/2012)

In 2006, Dóchas revised the 1989 EU NGO Liaison Committee Code of Conduct on Images and Messages (the code) for NGOs and “in April 2007, 35 of Ireland's aid and development agencies formally adopted the Code of Conduct relating to our publications. Their motivation was a desire to broaden public perceptions in Ireland about development work beyond the traditional 'help feed the black babies' psyche that had developed through generations in Ireland” (Justin Kilcullen, 2011)¹.

The aim of the code of conduct was “to provide a framework on which organisations can build when designing and implementing their public communications strategy. The Code offers a set of guiding principles that can assist practitioners in their efforts to communicate their organisation's programmes and values in a coherent and balanced way” (Dóchas, 2007)².

Since 2007, Dóchas has played a leading role in supporting the code in Ireland and at EU level. As the numbers of signatories to the code in Ireland has grown (57 signatories, including 44 Dóchas members in 2010) (Guthrie, 2010)³, with the welcome inclusion of non-Dóchas members, Dóchas has supported the implementation of the code in Ireland (among all signatories) through the provision of part-time staff support, resources on the Dóchas website, the annual administration of a code questionnaire among signatories and the organisation of an annual code feedback seminar.

As evidenced in this report, many organisations feel that the code has been a very worthwhile exercise in terms of building awareness within the international development sector in Ireland of the importance of the use of images and messages which reflect the core principles of the code: “respect for the dignity of the people concerned; belief in the equality of all people; acceptance of the need to promote fairness, solidarity and justice” (Dóchas 2007)⁴.

By signing up to the code, signatories commit themselves to best practice in communications and to putting in place “meaningful mechanisms to ensure that the code's principles are implemented throughout all activities of our organisation” (www.dochas.ie). In 2010, Dóchas commissioned Maeve Guthrie to undertake research on levels of adherence to the code⁵. The scope of the research was narrow and she acknowledges the difficulties with assessing organisation's representations through the research undertaken: “The most difficult to assess is levels of adherence to the Code in terms of images and messages conveyed on the website. As there are multiple images on the majority of websites it is not possible to assess and report on each individually” (2010, p.2). Though she argues that the “general impression” is one of adherence to the code, she goes on to say that “there are many inconsistencies within and across websites on some of the key principles of the Code e.g. enabling first person narrative” (2010, p.3).

1 Justin Kilcullen (2011) Concluding Remarks. In: *Ethical Communication: The European NGOs Code of Conduct on Images and Messages - Best Practices and Challenges*, Concord and DEEEP.

2 *Dóchas Code of Conduct on Images and Messages* (2007), Dóchas. Available from: www.dochas.ie

3 Maeve Guthrie (2010) *Report on Levels of Adherence to the Code of Conduct on Images and Messages*, Dóchas.

4 *Dóchas Code of Conduct on Images and Messages* (2007), Dóchas. Available from: www.dochas.ie

5 Maeve Guthrie (2010) *Report on Levels of Adherence to the Code of Conduct on Images and Messages*, Dóchas.

Despite the advance in awareness within the sector and efforts on the part of Dóchas and of NGOs, a number of challenges remain in relation to code compliance and implementation within the sector. Though signatory organisations, by signing up to the code, agree to certain measures⁶ these on-going challenges were recognised by the Dóchas board, following the Guthrie research above, who “reiterated that adherence and compliance with the Code should be a matter of utmost priority to all signatories: it is critical that our sector enhances its credibility and accountability, and the Code is a pivotal element in that process” (Dóchas 2010)⁷. As such, in 2010, Dóchas introduced 4 minimum compliance requirements. These are: “make reference to the Code on your main website by displaying the Code logo either on your 'Homepage' or in your 'About us' section; make reference to the code in your annual report; fill in and return Dóchas questionnaire on your implementation of the Code's commitments on an annual basis; and take part in peer-accountability reporting in the form of the Dóchas annual meeting for signatories” (ibid).

Thus far, while some research on the code has been undertaken (e.g., Kennedy 2011)⁸, there has been no comprehensive evaluation or research on code compliance. At the consultation meeting on draft findings (February 2012, see Appendix E), the need for further research in the area was identified in order to support code compliance and to “hold organisations to account”. While this report of the review of the Dóchas Code of Conduct on Images and Messages (2011/2012) does offer some useful findings, it does not constitute an evaluation of code compliance. Neither did the review did not set out to address the research gap in the area - it offers practical recommendations of how the code can be strengthened following a short consultation process - (see aim and scope of the review, Section 2).

This report also points to on-going challenges with code implementation within the Irish international development sector. Some of these challenges were highlighted in workshops⁹ while these, and others, were re-iterated in the consultation meeting¹⁰ undertaken with code specialists and those who have been promoting the code within their organisations and within the sector for many years. The points raised at the consultation meeting have contributed to identifying the context which underpins this review.

1.1. Context for the Review and Challenges

Through Dóchas, the international development sector in Ireland has played a significant leadership role in the area of development representations or the use of images and messages, especially among NGOs at EU level, since 2007. Justin Kilcullen has pointed out that “the adoption of the Code of Conduct has been a positive collaboration of Confederation members and one which can guide collaboration in the future. I hope the Irish experience of the Code of Conduct will benefit the wider European implementation of the Code as members have the benefit of learning from our experience, both positive and negative” (2011, p. 31)¹¹.

Despite advances in this area since 2007, the international development sector in Ireland is faced with many challenges which make code compliance difficult. It is a very diverse sector,

6 See Declaration of Commitment in the Dóchas Code of Conduct on Images and Messages. www.dochas.ie

7 Hans Zomer (2010) *Memorandum to All Signatories to Dóchas Code of Conduct on Images and Messages*, Dóchas.

8 Denis Kennedy (2011) *The Code of Conduct on Images and Messages: the Irish Experience*. In: *Ethical Communication: The European NGOs Code of Conduct on Images and Messages - Best Practices and Challenges* (2011), Concord and DEEEP.

9 See Appendices

10 See Appendix E

11 Justin Kilcullen (2011) *Concluding Remarks*. In: *Ethical Communication: The European NGOs Code of Conduct on Images and Messages - Best Practices and Challenges*, Concord and DEEEP.

with NGOs of different sizes (financially and in terms of staff - in Ireland and internationally), with different approaches to or discourses of development, working on a variety of development strategies (advocacy, development education, programme support, direct emergency relief etc) and in diverse regions of the world (e.g., countries in Asia, Latin America, Africa and East and Central Europe). From this point of view alone, it is difficult to have a code of conduct on the use of images and messages that meets the needs of all organisations.

When we look even deeper within organisations, the challenges of a 'one size fits all' approach to codes of conduct become even more evident, with different priorities and often tensions, in this case, between the interests of fundraisers and campaigners, field staff and development educators, Irish 'branches' of internationally-based NGOs and their head offices etc. As one person at the consultation meeting put it - when it comes to the code "there is internal conflict within organisations - organisations themselves can be at loggerheads". This is not surprising, but it does help to explain why the code was designed as a broad, principle-based document, which encourages good practice through the sharing of experience and responsibility within the sector for code compliance. It was designed to be interpreted by organisations to meet their needs, but, as indicated from the review process outlined below, interpretation can often lead to a lack of clarity on what is involved in code compliance. There is concern that signatory organisations do not always apply consistent high standards in their communications, especially when the code represents self-regulation of standards, with all the challenges that voluntary codes bring.

The context within which organisations are working to implement the code is further challenged by reduced funding for ODA and greater competition for public funding in the context of a recession. Competition within the sector for funding goes hand in hand with "a changed organizational environment that is more amenable to self-regulation. Key trends include the growth of the sector since 1989, increased professionalization and bureaucratization of agencies, and a changed normative context. The latter is particularly noteworthy; it has manifested itself in a crisis of legitimacy in the sector - the idea that good intentions are no longer enough - and the perception that nonprofits must increasingly base their work on agreed rules and standards" (Kennedy 2011, p.22)¹².

Thus resources within the sector are increasingly limited. Competition for funding is compounded by the widely held view (and experience of many organisations) that 'emotive images (and messages) raise the most money'. Little evidence has been gathered that code compliant images and messages raise the funds organisations require to do their work - this weakens arguments for and commitment to the code, even within a sector that is broadly supportive of the code of conduct. This challenge is further evidenced by 'a race to the bottom' in terms of images and messages, which often occurs at times of emergency when competition within the sector is at its most intense - it is hard for one organisation not to show stereotypical images of famine, for example, when others are doing it. This has led participants in the review to make comments like: "for buy-in for the code, we need buy-in from the whole sector - we're in it together" and "there needs to be something coming out about CEO and organisational buy-in. For the code to be really taken on and mainstreamed, we need that". Such comments point to frustration on the part of NGO staff that there are competing expectations of them with regard to the code - on the one hand their organisation has signed up to the code, but on the other, there does not always seem to be a commitment on the part of organisation management to implement it - 'they are concerned about the 'bottom line' and if that compromises the code, then so be it'. This suggests significant challenges, especially for management and fundraisers, in implementing the code, especially when the end (engagement in emergency or long-term development work) is

¹² Denis Kennedy (2011) The Code of Conduct on Images and Messages: the Irish Experience. In: *Ethical Communication: The European NGOs Code of Conduct on Images and Messages - Best Practices and Challenges* (2011), Concord and DEEEP.

regarded as justifying the means.

There is also frustration at media standards which contradict code principles, where NGOs find it difficult to maintain code standards when the pressure is on and when communications are controlled by the media. Though media representations of development is outside the remit of the code and this review, relations with the media have a significant bearing on the context within which NGOs operate and on how they communicate.

Despite frustrations and challenges, it is important to recognise the growing numbers of organisations (Dóchas members and others) who are signatories to the code (64 in 2012)¹³. DTALK Learning has provided training on the code each year since 2009; NYCI had 'Framing our World' as the theme of its 'One World Week' in 2010 and the Africa Centre has been in a 3-year EU funded development education programme called 'Images of Africa from an African Perspective' in partnership with ACSONI in Northern Ireland and the Africa Centre of Slovenia. In addition, since 2011, Irish Aid requests information about whether or not an organisation is a signatory to the code in some funding application processes. These measures point to growing interest in the the area of development communications, an important consideration which underpins this report.

1.2. The Structure of this Report

This report outlines the process, findings and recommendations of the Review of the Dóchas Code of Conduct undertaken in between 2010 and 2012. Apart from the background, context and challenges which underpin the report (as outlined in section 1 above) other sections address each of these themes in turn. In section 2, the aim and scope of the review are introduced, and the process is summarised in section 3, with details of data collected in workshops available in the appendices. Section 4 explores the findings of the review and it is organised thematically with reference to the objectives of the review. Section 5 presents conclusions and section 6 outlines the recommendations arising from the findings.

¹³ A list of signatory organisations is provided on the Dóchas website: www.dochas.ie

“Either Dóchas steps up monitoring and compliance responsibilities or it is put back to signatories to exert peer influence in a constructive way.” (Workshop 3)

2. Introduction to the Aim and Scope of the Review

A task group of the Dóchas Development Education Group was established in 2010 to review the Code of Conduct on Images and Messages (see www.dochas.ie).

2.1. The Aim of the Review

The Review of the code aimed to strengthen the code within Ireland. The objectives of the review were to:

- revise the Code of Conduct if necessary;
- make the Code of Conduct more user friendly by developing an illustrative guide to compliment the code;
- promote greater ownership of the code among signatories;
- devise indicators to ensure implementation of the code's principles and;
- recommend implementation and monitoring mechanisms to ensure compliance with the principles of the code.

2.2. The Scope of the Review

The review did not set out to be a review or an evaluation of practice or compliance, but rather to consult with signatories and other interested parties on the code with a view to strengthening it. It was not designed as an exercise in word changes in the code itself, though changes to the code were not excluded. In order to fulfill the objectives of the review, the Dóchas task group decided to focus on organising a meaningful process of dialogue and reflection on the code through a series of workshops in order to:

- assess whether the code's principles remained relevant and appropriate
- devise indicators for assessing code compliance and to develop illustrative guidelines on practice
- identify suggestions and identify recommendations on implementation and monitoring mechanisms to ensure compliance with the principles of the code within the Irish development sector.

“Interpretation of the code can be quite subjective as it's quite general and open to interpretation. Organisations can easily say that they are in compliance with the code when they may not be.” (Workshop 3)

3. Review Process

Throughout 2010 and 2011, 8 meetings of the Dóchas Code of Conduct Task Group were held including a meeting with Hans Zomer, Director of Dóchas in October 2011 in order to plan and assess the review process. An additional consultation meeting was held with code specialists (10 people) among signatory organisations to review the draft report of the review in February 2012. As outlined earlier, the review process was not designed as a formal piece of research, academic or otherwise. Rather it was designed to engage representatives of signatory organisations in dialogue and consultation on various aspects of the code and its implementation at organisational and sectoral levels. Despite the range and depth of ideas, suggestions and recommendations identified here, it was a limited process with limited resources.

The Dóchas Task Group organised a series of 4 workshops in 2011 to facilitate reflection on the code as the major part of the review process. The focus of each workshop was developed incrementally from the initial workshop held in March, in order to address issues emerging.

Approx 94 people (representatives of signatory organisations and other interested parties) participated in these workshops and meetings, though this number includes some people who participated in more than one workshop or meeting. The workshops were designed to incrementally develop the dialogue on the code and its relevance, and to illicit suggestions and recommendations on what mechanisms need to be put in place in order to strengthen the implementation of code principles in NGO images and messages in Ireland.

Detailed reports of the workshops and consultation meeting are available in the appendices.

“What one organisation thinks is code compliant may not be. Is there a set of criteria for assessing code compliance and giving guidance on it? Should it remain an open document which allows for various interpretations?” (Workshop 3)

4. Overall Findings from the Review

The findings below are discussed with reference to the three overarching objectives of the review process. The process focused on three main areas: the relevance of the code principles; indicators for assessing code compliance and illustrative guidelines; and implementation and monitoring mechanisms. Given the emphasis of the review on strengthening code compliance within the Irish international development sector, the Dóchas code of conduct task group placed more emphasis on the third of these objectives throughout the review process. Currently, the illustrative guidelines are in development, and it is anticipated that these will be presented to signatories for further consultation at the annual Dóchas feedback meeting in June 2012. Findings from the review are presented here, not in order of priority, but with reference to each of the objectives in turn.

4.1. The Relevance of Code Principles

It was only in the first workshop that the review process directly addressed the relevance of code principles. There, though there was broad agreement with the principles, with statements like; “a lot of work has gone into them”, the “principles are good” and “the principles are fair and good”, there was a general sense that there needed to be more guidelines on how to implement the principles in practice. One person highlighted that “it’s important to consider how to do things, e.g., ‘ensure that people can tell their own story’” and another pointed to the need for guidelines for implementation. Some were critical of the implicit assumptions in the principles, including the view that they are very “Northern focused”, while others highlighted that they need to focus more on children’s rights and on encouraging organisations to represent context.

When focusing on how the ‘we strive to’ statements, which apply the code’s principles to practice, are outlined in the code, overwhelmingly, participants were critical of statements as being “too broad”, “too subjective”, “too vague”, “open to interpretation” and in need of being “broken down” and “definition”. Criticisms of the “Western perspective” of the principles re-emerged in workshop 2 and the need for child protection guidelines were also discussed in workshop 3. This issue was discussed in depth at the consultation meeting in February 2012. There, it was highlighted as relevant and a very important issue, with the concern addressed that international development organisations may not apply the same standards with regard to child protection as do organisations addressing issues in the Irish context. The need to review best practice and legal issues with regard to child protection and the code was discussed.

Issues of subjectivity and the openness of the principles to interpretation also re-emerged in workshop 3 in relation to identifying challenges to code compliance. One person argued that “interpretation of the code can be quite subjective as it’s quite general and open to interpretation. Organisations can easily say that they are in compliance with the code when they may not be”. It was argued by another that “what one organisation thinks is code compliant may not be. Is there a set of criteria for assessing code compliance and giving guidance on it? Should it remain an open document which allows for various interpretations?” There were different views on each of these issues, with little agreement. The importance of the code remaining open to interpretation was highlighted by a few participants, who felt that the code should not

become a 'ticking box' exercise, or who identified the importance of using organisational interpretation of the code as a means of encouraging best practice. One person thought that organisations hide behind interpretation to allow them to do whatever they want, i.e., going against the spirit of the code.

In the consultation meeting, the point was made that review of code principles and of code implementation is not a 'one-off' task - "we need to keep working on it, it is an on-going process". With this in mind, the meeting recommended the need to review the code principles again in 2015.

Findings on the Relevance of Code Principles

In the light of the overall support for the principles as set out in the code, the Dóchas task group determined that, for this process, it would not be appropriate or possible to re-write the principles of the code of conduct at this time. This would not preclude further work in this area in the future, though it is regarded as very time-consuming work upon which it is difficult to reach consensus. The Dóchas task group concluded that the illustrative guide would be used to provide clarity on the code. Child protection was raised as an issue in discussion in workshop 3 and was presented for consideration in workshop 4. Despite this, there was little focus on this area by participants at that workshop. The need for further investigation of child protection guidelines in relation to code implementation was identified as important at the consultation meeting. In response to the criticism that existing principles are vague and open to interpretation, the Dóchas task group concluded that the illustrative guidelines would be developed in such a way as to guide signatory organisations on how to implement the principles in practice. It is recommended that Dóchas undertake a further review of the code principles in 2015 with a view to assessing their continued relevance and appropriateness.

4. 2. Indicators for Assessing Code Compliance and Illustrative Guidelines on Practice

In workshop 1, participants were asked to reflect on each of the principles and to identify images, words, captions, terms, labels, cartoons, videos and case studies which could or could not be used in relation to each with reference to 'the organisation and its work', 'where the organisation works and the work contexts', 'partners' and so-called 'beneficiaries'. The purpose of this exercise was to illicit participants' understanding of the kinds of images and messages which are code compliant. It was felt that this exercise would give a good insight into how the principles of the code could be implemented in practice and thereby help to identify criteria for monitoring compliance, e.g., with reference to the principle of 'respect for equality of all people' the following suggestions emerged: "emphasise intercultural collaboration as opposed to the many ways the organisation can help" and "show people working together". With regard to the principle of 'respect for the dignity of the people concerned', it was suggested that images which portray "situations of pity" or "vulnerable images" should not be used and that we should "avoid using images that dehumanise, victimise or demonise" people.

In workshop 4, these initial indicators were developed. Various suggestions were put forward with regard to the kind of words which would be associated with 'good practice', 'grey area practice' and 'bad practice', with reference to code principles as outlined in the 'we strive to' statements in the code. 'Bad practice' words identified include 'give', 'needy', 'victim', 'helpless', 'the poor', 'the vulnerable', 'saving' and 'taking care'. 'Grey area practice' words include 'charity', 'assistance', 'less developed/developing/third world', 'helping', 'the poor', 'beneficiary', 'empower', 'poor people' etc. The point was made in discussion that how words are used in a

sentence can make them code compliant or not - it sometimes depends on the context within which words are used rather than the words themselves. 'Good practice words' include 'support', 'make a difference', 'empowerment', 'justice', 'connecting', 'mutual learning', 'working with', 'X community is doing X', 'people experiencing poverty' etc.

Suggestions for the development of the illustrative guidelines for the code of conduct were discussed in workshop 4. These are currently in development.

Findings on Indicators

As outlined above, questions of interpretation of the code's principles arose in workshop 3, with concerns that the code (and by implication, indicators of code compliance) should not become a 'ticking box' exercise. With this in mind, the Dóchas task group determined that indicators of code compliance (as identified in workshop 1 and workshop 4) would form the basis of the illustrative guide, rather than being published as a stand alone document.

4. 3. Implementation and Monitoring Mechanisms

This section on implementation and monitoring mechanisms comprises the main thrust of the review process to date. Given the complexity of issues involved, it is presented here under various sub-headings: good practice and implementation support mechanisms; monitoring and review mechanisms; reward mechanisms; and the role of Dóchas. Within each sub-heading, various suggestions from each of the workshop are presented and discussed. While some of these represent suggestions for new practice, it is fair to say that many of the suggestions identified in workshops represent the 'roll-out' of existing good practice or the development of current practice within organisations and the sector. In one case, the suggestion represents learning from the Australian Council for International Development (ACFID) Code of Conduct.

4.3.1. Good Practice and Implementation Support Mechanisms

Management and Organisational Ownership of the Code

Ownership of the Code needs to happen at all levels of an organisation and in all aspects of practice, e.g., from volunteers and staff to management and board members, through training, internal debate and discussion and through various code implementation structures. In this sub-section, general points about management and organisational ownership of the code are addressed, with detailed discussion of other aspects of developing ownership to follow.

In workshop 4, the challenge of ensuring management 'buy-in' to the code emerged as a serious challenge to code implementation within organisations. Management 'buy-in' was considered one of the top 3 priorities for ensuring code compliance in individual rankings of various options. In group discussions, it was highlighted that though management have signed up to the code, they have not put sufficient resources into "ensuring that the organisation modifies its communications and advertising in order to be code compliant".

With regard to management "buy in" a number of suggestions were put forward in order "to embed the code across an organisation": "webinars for management/directors"; "management as a champion. Senior management need to buy in through regular reviews. Some form of

accountability mechanism [to be] approved by the senior management team”; and “the Dóchas CEO meeting [needs to] include a discussion on the importance of the code”. The importance of management 'buy-in' to the code re-emerged in the consultation meeting, if the code is “to be really taken on”. When considering the possibility of additional questions being added to the annual Dóchas questionnaire on implementation, the importance of management ownership of the code re-emerged. It was thought that strengthening the questionnaire “raises awareness and encourages self-assessment, improved practice and 'buy-in' from management”. The group argued that buy-in from management should be evaluated in the questions, as should buy-in from board. The need for management and board membership training were also identified (see below).

As organisational ownership depends on the size and location of the organisation, in workshop 3 and in the consultation meeting, the responsibility of Irish organisations to inform field offices and head offices (where relevant) about the code was raised. These were highlighted as significant challenges (as outlined in the introduction above) as some Irish based organisations are small subsidiary organisations of larger multi-national organisations, which have their own standards in relation to branding and development communications. Despite this, as signatories to the code, they feel they have a responsibility to try to implement the code as much as possible and to inform 'head office' about it. Furthermore, for large international organisations based in Ireland, they feel they have a responsibility to inform field or other sub-offices about the code, though this is a challenge for them.

The isolation of fundraising staff within organisations and within the sector was highlighted as a significant challenge to code implementation in the consultation meeting. Given that they do not have a support forum among their peers in other development organisations, there is little networking going on among fundraising staff. This compounds the sense of competition among fundraisers. That they also feel the tension, and often most acutely, of fundraising and how it can contradict code implementation within international development organisations was also highlighted. At the consultation meeting, ownership of the code among fundraisers was considered to be of great importance for the strengthening of code implementation within the sector. As such, it was suggested that Dóchas encourage the creation of a space for fundraisers (a working group, perhaps) to get together to reflect on the review report, as a start, and on code implementation more broadly.

Structures within Organisations including Code Champions

Though ownership of the code among management was identified as particularly significant for the successful implementation of code principles, it was also thought that organisations should be “continually reflecting on what they are doing right and wrong”, that there should be “internal debate” on the use of images and messages and that issues should be raised with the code champion. The need to centralise communications within an organisation was highlighted in workshop 3, especially in the context of big organisations, where it is necessary to link between Irish and overseas operations/head office. The importance of having a code champion within an organisation was explored, with the view that where there are 'code champions' in place, organisational implementation is stronger. A code champion is an identified person with responsibility for code implementation across an organisation. Though there was consensus on the important role a code champion can play in ensuring code implementation, some challenges were also highlighted. In workshop 3, a warning was sounded that “not just one person [the code champion] [would be] responsible for code implementation within an organisation”, and that the code champion needs support and should be in a position of influence within the organisation.

Training

In the workshops, the need for training for “all levels of an organisation” was highlighted, as was “cross-organisational training” and “adequate training especially at production level”. Specific training was suggested for volunteers (workshop 3) as was “more public awareness and debate on the code” (workshop 2). With regard to public awareness of the code, in workshop 2 one person argued that “the code has good value, but it needs to be made more practical and well-known to the people through the internet, debates and campaigns in the media”. In workshop 3, 'more targeted training, e.g., for marketing personnel, for promotions etc' was among the two top ranking suggestions in individual ranking of support areas. This was also regarded as among the top 3 priorities overall for strengthening code implementation.

In workshop 4, there were various suggestions about the need for management and board training (as outlined above), and there was consensus on the need for “more targeted training”, with comments that “there needs to be a data base of skilled photographers; important for supporters, volunteers etc to have training; should cover issues such as visual literacy and photo ethics; need to look at organisation specific training where training is accompanied by policy development”. The need for training for people involved in various work areas within organisations or the sector was later discussed in detail, e.g., campaigns/advocacy; volunteers - “pre-departure training, here in Ireland also, online training”; development education - “part of discussion with other groups, trained to train others”; and fundraising/communications and marketing - practical training for “photographers, cameramen, graphic designers, web developers - create a database of people who have training”. It was suggested that signatories could do training remotely, that training needs to be practical and that 'partners' need to be given a “copy of guidelines” and involved in discussions or video/webinars.

In the consultation meeting, it was suggested that organisations who have put in place mechanisms for good practice should be encouraged (as they are at the annual feedback seminar) to share their experience and innovation with other organisations, wherever possible.

Use of Photographs and Consent

In addition to issues regarding images and messages which emerged during workshop 1 and workshop 4, as outlined in the section on 'indicators of code compliance and developing an illustrative guide' (above), a few specific concerns were raised about organisations' use of photographs and consent. When exploring challenges regarding code implementation in workshop 3, the issue of small organisations sourcing photographs was identified as was the question of “photograph recycling - how long should images be in use?” Participants called for support and new practice with regard to sourcing photographs: one person suggested the “need for a forum for sharing resources from field trips - perhaps share field trips between organisations or departments within larger organisations in order to reduce costs”; another suggested that a list of suppliers who are briefed on the code should be established, perhaps by Dóchas; and the practice of employing local staff to take photographs was suggested. This issue was addressed in the consultation workshop where it was recommended that guidelines on the sourcing, storage and use of photographs be developed.

With regard to the issue of consent, a particular concern was raised, in workshop 1, about consent in relation to the use of photographs of children. In addition, the issue of full consent was also raised with regard to in whose interests images and words are used. “Do people fully

understand the implications of giving consent?”

Other Good Practice and Implementation Support Mechanisms

In addition to the suggestions identified above, workshops highlighted the need for the continuation of the annual meeting for reporting and learning and using the Dóchas website for sharing resources. In workshop 1 the need for more input by 'Southern voices' and 'other minorities' in Ireland was highly regarded as a means of supporting code implementation among organisations. The idea of Irish Aid not funding those who are not signatories to the code was also discussed at that workshop, with one person cautioning that “an organisation might be signed up to the code but not complying”. Though presented as an option for discussion in workshop 4, there was little focus on this issue at that workshop.

Findings on Good Practice and Implementation Support Mechanisms

With regard to good practice and implementation support mechanisms, the most significant finding which came from the workshops was the need for management ownership of, commitment to and 'buy-in' in relation to the code of conduct. Managers need to consider ways of ensuring code ownership with the organisation, and to consider the implications of this for field or head offices in other countries. The promotion of code champions was also recommended in workshops but these need to be supported with cross-organisational reflection on the code and its implementation at organisational level. This can happen through internal debate as well as through general and directed training for management and staff as well as through the development of guidelines for the support of code champions. The need for fundraisers to be supported to engage more fully with the code was highlighted as important for organisational ownership of the code as was the idea of the creation of a space for fundraisers to network within the sector. The need to include more 'Southern' and 'marginalized' voices in any consideration of code implementation was highlighted at the consultation meeting, as was the need to inform (where relevant) members, partners, head offices, field offices and volunteers that they are signatories to the code and to provide them with a copy of it. The Dóchas task group are making recommendations (see section 5) in relation to each of these areas. With regard to the challenges of using photographs and seeking consent, the Dóchas task group have concluded that guidelines be produced on the sourcing, storage and use of photographs be produced before 2015.

4.3.2. Monitoring and Review Mechanisms

Review Committee and 'Naming and Shaming'

In workshop 1, participants were invited to reflect on additional monitoring and review mechanisms which might be put in place - to augment current Dóchas practice in this regard. There, participants suggested the need to appoint an independent review committee to oversee code implementation. At the same workshop, it was generally agreed that organisations that are performing well should be 'named' but not 'shamed'. When these ideas were presented to participants at workshop 3, there was less certainty about the validity of these proposals. With regard to the scenario of a Dóchas review committee being established that would draw up an annual list of those organisations who are deemed code compliant, the general response from groups was that it is better to incentivise organisations to good practice rather than to 'name and shame' good-practice or bad-practice organisations.

In workshop 3, while one group thought that it is a good idea to measure compliance, the idea of creating a list, even if only of code compliant organisations, was regarded as challenging. Given that the code is so open to interpretation, a point highlighted by three groups, it would be difficult to draw up such a list. It was also thought that such a list would be based on subjective judgement by a review committee (because of the lack of agreed indicators for code compliance). Another group thought that drawing up a list could be divisive unless the committee was independent. The idea of “public name and shame” was not regarded as a good idea by one group. Other groups generally agreed, with one group suggesting that “Dóchas should more focus on facilitating good compliance”, and another suggesting that “we would rather examples of trends and best practice” rather than “naming and shaming”.

Peer Review

The idea of Dóchas facilitating a peer review system was addressed in workshop 3. In the first part of workshop 4 it emerged as one of the most favoured means of ensuring code implementation. With reference to individual ranking of monitoring and review mechanisms in that workshop, peer review was regarded as one of the two most important monitoring and review suggestions, and it was one of the top 3 priorities of all (13) suggestions to strengthen code implementation. In contrast to these findings, in later discussions on peer review at the same workshop, 7 (of 20) participants thought that a peer review process would not work, with 13 arguing that it might work but that it would need more thought before it could be implemented. Some participants were wary that it could become a cumbersome, time consuming and expensive process. It was suggested that it could be tied in with the annual meeting and that organisations could be tiered on the basis of their size. One group suggested that a peer review should review materials over a time-bound period, perhaps of 6 months or a year. Questions were raised about whether the peer review process should be anonymous or not or whether there should be recognition of the results or just feedback from the peer review process. There was a question about who would select the material to be reviewed or whether the process should be undertaken in focus groups or involve the general public. There were few clear guidelines on how the process should be undertaken from this group.

Annual Report to Dóchas on Organisations' Use of Images and Messages

The idea of organisations writing an annual report on their performance in relation to the code of conduct was addressed in workshop 3. Some groups felt that this was a good idea, but others disagreed, highlighting practical difficulties. One group thought that the format of an annual report was not the best means of sharing their practice and examples with Dóchas and other signatories. They did not think the idea of annual reporting on the use of images and messages would be successful. Another group indicated that while it might be possible for a small organisation, for a large organisation it would be too much work. This view was echoed by another group who felt that it might be a duplication of other reporting. One group, who thought it was a good idea, suggested that it would be possible to do a brief report with samples of materials, but that the information should be shared among signatories. They argued that “either Dóchas steps up monitoring and compliance responsibilities or it is put back to signatories to exert peer influence in a constructive way”. The suggestion of adding questions to the existing annual questionnaire was highlighted as an alternative by many groups.

Developing the Annual Dóchas Questionnaire as a Self-Assessment and Monitoring Mechanism

Instead of a peer review mechanism or an annual report, many workshop participants argued for the development of the questionnaire as a means of organisations reviewing their own work.

This idea emerged in workshop 3 and was addressed in detail in workshop 4. As part of the individual ranking of important review and monitoring mechanisms in workshop 4, developing the Dóchas questionnaire emerged as one of the two top individual priorities. When explored in a general discussion, the idea of strengthening the annual questionnaire was regarded highly as it is “important to encourage self-assessment”, though there are “issues about who fills out the questionnaire”. It was suggested that answers should not come in the form of ‘yes/no’ answers but show progression.

The proposal to strengthen the Dóchas annual questionnaire was discussed in detail in the second part of workshop 4 by a small group. The group recommended that the Australian PQASSO/ACFID system of scoring be applied¹⁴. This, it was argued, offers an “opportunity for support between organisations [and] encourages organisations to think about how to be compliant”. It was suggested that, with this different scoring system, “practical implementation would be demonstrated/progressed”. While this was generally regarded as a good idea, there was a concern about focusing on the questionnaire without ensuring buy-in from management and an organisation’s board. The group argued that buy-in from management should be evaluated in the questions, as should buy-in from board. There should be an additional question regarding targeted training and any extra work done in the past year to implement the code. At the consultation meeting, it was suggested that the questionnaire should, at a minimum, be signed by a member of management and that a system of feedback/dialogue on questionnaires should be put in place.

Minimum Criteria for Code Compliance

The minimum criteria for signatories’ compliance was discussed in depth in the consultation workshop, with one person highlighting that “they are nothing - with a small step forward they could really improve things”. There was consensus at that meeting about the need to strengthen the minimum criteria and a series of recommendations were developed in this regard at the meeting (see section 5).

Strengthening Feedback Mechanisms

Given that one of the central tenets of current practice in relation to monitoring code compliance is the establishment by organisations of a feedback mechanism to encourage the public to provide feedback on their performance in relation to the code, the issue of feedback mechanisms emerged as important, especially in workshops 2 and 3. In workshop 2, it was suggested that “people should be empowered to give feedback to organisations on the use of images”. In workshop 3, a general discussion took place about whether the feedback mechanisms were working well or not. The general consensus from the discussion was that the feedback mechanism is currently not working well as few organisations have ever received feedback on their use of images and messages.

Though there were differences of opinion with regard to organisational feedback, the overwhelming response was that organisations have a responsibility to provide feedback to each other in relation to their code compliance. Some people felt that it was difficult for signatory organisations to engage in critical feedback of other organisations’ use of images and messages, especially within the context of a small sector. This was challenged by others who argued that if signatories are not willing to challenge each other, it is difficult to expect the public to. The need to engage the wider public in the issue of images and messages re-emerged in the

¹⁴ (See <http://www.acfid.asn.au/code-of-conduct/code-of-conduct>)

consultation meeting, with the idea that international development organisations can learn from further engagement with organisations working on similar issues in the domestic context.

In terms of strengthening the feedback mechanism, the suggestion was put forward that two template letters could be developed and put on each website - one for complimenting an organisation on its use of images and messages and the other which highlights some concern about its use of images and messages. This was thought to be stronger than the currently weak feedback mechanism (which requires someone to compose their own email to the identified code representative within an organisation), as it would provide the public with a more direct communication tool. In a later group discussion on the issue, one group suggested that, though there should be a means of formally contacting organisations and providing feedback, “perhaps there should be a neutral, more tactful way of providing feedback/complaining, i.e., a constructive debate platform”.

Other Monitoring and Review Mechanisms

In workshop 3 the idea of organisations re-applying to be a signatory after 5 years was presented as a possible monitoring and review mechanism. This was not identified as a priority mechanism and therefore not discussed in any depth in workshop 4.

Findings on Monitoring and Review Mechanisms

Though various mechanisms for review and monitoring code compliance were discussed at different workshops, as outlined above, there was little agreement on the establishment of a review committee but clear agreement that the idea of 'naming' and 'shaming' could be divisive and that it was not to be recommended. Though initially regarded as a very good idea, there was also little consensus on how a peer review mechanism might constructively be put in place. Some did not like the idea and others thought it would need a lot more consideration in order to make it a workable option. The Dóchas task group have concluded that this needs further exploration before any peer review system can be established.

The idea of an annual report was discussed in workshop 3 and generally rejected. Overall, participants of workshops favoured the idea of adding additional questions to the existing Dóchas annual questionnaire as a means of self-assessment. Though some suggestions for the types of questions to be added and the type of questionnaire to be favoured, i.e., one based on the Australian model, which encourages organisations to focus on what they are doing well and on how they can improve, this requires further exploration before it can be put in place. The Dóchas task group have concluded that adding additional questions to the annual questionnaire would appear to be the most constructive way to encourage self-reflection. This idea needs development if it is not to become another means of reporting without changing practice, and if it is to address the criticism of one person in workshop 2: “it is a weak code lacking the power of enforcement”. The Dóchas task group feels that it is incumbent on this review process to ensure that whatever review and monitoring mechanisms it recommends should lead to stronger practice in the area. With this in mind, it is important that management are involved in the questionnaire process and that there is a system of dialogue put in place on questionnaires in order to acknowledge good practice and encourage improvement.

Based on the consultation meeting, but also drawing from suggestions in earlier workshops, the need to strengthen the minimum criteria regarding code compliance was identified as a

significant measure which could lead to improvement in code implementation.

With regard to the current approach of using a feedback mechanism, there was little confidence that this is working as a monitoring mechanism. Workshop 2 usefully highlighted that the public are not sufficiently aware of the code or of the feedback mechanism in order to be able to employ it. While signatory organisations are aware of it, some are reluctant to challenge other signatories about their use of images and messages. Despite this reluctance, there was a general sense from workshops that if signatories do not challenge each other, albeit in a constructive manner, there is little chance that anyone else will. The suggestion was put forward that the feedback mechanism be strengthened through the publication on websites of two template emails to facilitate ease of communication on the matter. Another suggestion was the idea of establishing some form of a debate platform on performance.

4.3.3. Reward Mechanisms

The idea of rewarding good practice emerged at a number of workshops, with the view that it is important to incentivise organisations in order to encourage code compliance. Despite this, few detailed discussions were held on this area with limited suggestions for practice.

Quality Mark

Though the idea of establishing a Q Mark or “promoting the code as a quality brand” was raised in workshop 1, and it was given a high priority in individual rankings of mechanisms to strengthen code implementation in workshop 4, there was little detailed discussion on what would be involved or on whether or not it would be effective.

Annual Award

The idea of an annual award was discussed by one group in workshop 3. They argued for “incentives”, perhaps an award scheme based on tangible examples of compliance. In workshop 4, it was also discussed by a group, who suggested that an annual award should be part of the outcome of a peer review. Organisations should apply for the award providing examples of their work, a “suite of materials”. This should be undertaken by an independent panel based on a checklist of indicators. It was thought that it would be a useful “carrot approach” and that, with peer recognition, it would lead to management buy-in, tangible outcomes and raise awareness. The award, they suggested, should be given at the annual Dóchas feedback meeting.

Annual Certificate to All Signatories Showing Level of Compliance

This idea did not receive any discussion - at small or larger group level - but it did receive some support in individual rankings of mechanisms for strengthening code implementation in workshop 4.

Findings on Reward Mechanisms

Of the three reward mechanisms discussed throughout the review process, the only one receiving any detailed attention was that of an annual award. It is fair to say, though, that the group discussing this chose to do so over and above the other suggestions they had before them -

this gives some indication that, at least that group of 5 or 6 gave it more weight than the other two ideas. On the other hand, this may be because they had insufficient information about what would be involved in a Q Mark. Considering the difficulties earlier identified with a peer review process (above), further discussion is required on the merits of such a reward mechanism, perhaps associated with the annual questionnaire. Despite the lack of information gained on best practice in this area from the review workshops, considering the importance that some participants have placed on the need for a reward mechanism to encourage code compliance, the Dóchas task group have concluded that reward mechanisms need further exploration.

4. 4. The Role of Dóchas

Comments and suggestions regarding the role of Dóchas in relation to the code of conduct emerged in all workshops. In earlier workshops, there was an assumption by many that Dóchas is largely responsible for strengthening code implementation. In workshop 3, Hans Zomer of Dóchas clarified that while Dóchas can play a significant role supporting signatory organisations to do this, it has limited resources to play that role and that it is important to encourage signatories to take as much responsibility as possible for strengthening code implementation.

In workshop 2, on the issue of 'what Dóchas can do' a number of suggestions emerged. The importance of workshops on the code was mentioned, including the provision of resource packs and seminars and the organisation of conferences "that involve the media, organisations and the public". Dóchas was encouraged to communicate more and meet more regularly with organisations on the code and to encourage "more public awareness and debate on the code" or to organise "an aggressive campaign through the media". Dóchas, it was argued, should liaise with the Advertising Standards Authority of Ireland and try to "influence Irish Aid and other funders not to fund organisations not complying with the code". This idea also re-emerged in workshop 3.

In workshop 3, a number of possible roles emerged for Dóchas. Their role in providing resources through the website was complimented, and the suggestion was offered that Dóchas could offer a list of service providers who have been trained in the code.

A further suggestion was that Dóchas could play a strong role in contacting signatory organisations who are not deemed to be acting in a code compliant manner on behalf of other organisations. In discussion, though it was acknowledged that Dóchas does remind organisations about the code especially in times of emergency, it was also felt that organisations should play a role in contacting organisations as peers.

The idea of Dóchas appointing a review committee was addressed in workshop 1, with significant interest in this area. Many thought, though, that the committee should be balanced and independent. A complaints system was suggested, in workshop 3, with one group arguing that "if an organisation repeatedly does not follow the code then they should not be supported by Dóchas as signatories to the Code". Other groups thought that Dóchas has a role to play in the creation of a complaints system, while two groups thought that a peer review system, perhaps through an informal task group of Dóchas, might be a good idea.

As identified in various sections above, it was thought that Dóchas could play a useful role in ensuring management buy-in to the code, even if it means organising webinars for managers or

encouraging discussion about the code at Dóchas CEO meetings. A significant role was also identified for the annual feedback meeting and the annual Dóchas questionnaire, with suggestions that the latter be augmented to encourage greater code compliance among signatories. At the consultation meeting, the role of Dóchas in enhancing the minimum criteria for code compliance was raised as was the need for more resources to support code implementation in the sector.

Findings on the Role of Dóchas

Dóchas are regarded as having a central role to play in encouraging and supporting signatory organisations to strengthen their implementation of the code of conduct on images and messages.

Strengthening the questionnaire “raises awareness and encourages self-assessment, improved practice and buy-in from management.” (Workshop 4)

5. Conclusions

The findings of this review indicate a high level of support for strengthening code implementation among NGOs in Ireland. This has led those involved in the review workshops and in the final meeting to make strong recommendations to the Dóchas board about strengthening code implementation within the sector. Denis Kennedy has remarked that “in Ireland, there has been a recurring debate over enforcement of the Code: is self-assessment sufficient, or are mechanisms needed to promote compliance? This debate has long defied consensus; however, if anything, the balance seems to be shifting in favor of some sort of light mechanism to ensure compliance” (2011, p. 22). Findings in this review indicate the importance of putting in place mechanisms to support code implementation, to monitor and review it and to reward good practice.

There was continued support among review participants for a broad based code, one which encourages internal dialogue and interpretation within organisations based on organisational differences. At the same time, there was a consensus that organisation managers and the Dóchas board need to play a stronger role in creating the standards required for code implementation at organisational and sector levels. “The Dóchas board has a strong role to play to hold organisations and CEOs to account on an annual basis”, as one person put it. Reflecting on Ireland's reputation in this area among European NGOs, it was pointed out that “the Irish example has been held up as an example within Europe, now we need to live up to it. This can be an example of how NGOs can work together”.

Despite the acknowledgement that resources are increasingly limited, and that limited resources impede the kinds of support, monitoring and review, and reward mechanisms possible with regard to the code, review participants repeatedly called for more, rather than less, resources on the part of organisations and Dóchas so that code implementation can be strengthened. At the same time, many of the suggestions made and recommendations highlighted require relatively little additional financial resources, and many relate to systems which can be implemented within organisations and across the sector. Though the challenges remain, this report highlights many ways in which the Irish international development sector can play the leadership role in this area it has identified for itself since 2007.

This review process set itself some ambitious objectives, but it became clear that it was a short and resource-limited process. The review identified some practical recommendations for action on the part of signatory organisations and the sector more broadly. It was not able to identify clear indicators for code compliance, despite the many suggestions which emerged at various workshops. These indicators will form the basis for the illustrative guidelines, but ideally more research is required in the area. More consideration is also required in relation to the establishment of a peer review mechanism, an award system and with regard to child protection and the code.

The need for continued work on various aspects of code implementation remind us that reviewing the code is an on-going process, not one which can be achieved in full in a once-off series of workshops and meetings.

6. Recommendations From the Review

Relevance of the Code Principles

- No significant re-writing of the Code of Conduct Principles should be undertaken at this time. The task group recommends that the principles be reviewed again in 2015 with a view to assessing their continued relevance and appropriateness.
- The illustrative guide (to be developed in 2012) will be designed to help to clarify interpretation of the code principles.
- A workshop should be organised by Dóchas in 2012/2013 to review best practice and legal issues re: child protection guidelines and the code.

Indicators for Assessing Code Compliance and Illustrative Guidelines on Practice

- Indicators of the code of conduct should form the basis for an illustrative guide on the code of conduct, rather than being published as a stand alone document.

Good Practice and Implementation Support Mechanisms

- Dóchas should organise webinars to encourage management 'buy-in' to the code of conduct.
- Each signatory organisation should be required to appoint a 'code champion' or 'champions'. The task group recommends that guidelines on the role and support required for code champions within organisations be produced.
- Each signatory organisation should be required to put in place a training plan for all staff, management and volunteers. Ideally, this training plan should also reflect on the specific needs of various groups related to the organisation, e.g., field office staff and service providers.
- Guidelines on the sourcing, storage and use of photographs should be developed by Dóchas (possibly through a task group of signatory organisations) before 2015.
- Organisations need to engage more actively with representative organisations of 'Southern voices' and 'other minorities' in Ireland as a means of strengthening their code implementation.
- Organisations have an obligation to inform (where relevant) members, partners, head offices, field offices and volunteers that they are signatories to the code and to provide them with a copy of it.

Monitoring and Review Mechanisms

- The idea of establishing a peer review process should be investigated further with Dóchas secretariat support.
- Dóchas should support the development of additional questions to be added to the annual

Dóchas survey questionnaire for implementation in 2013. These questions should be designed to encourage organisational reflection on practice and improved code compliance - not 'yes' or 'no' answers, but answers which reflect grades of implementation, e.g., reflecting the Australian PQASSO/ACFID system of scoring. The Dóchas survey questionnaire should be signed and returned by a member of the organisation's management team. Once received by the Dóchas secretariat, some (simple) system of dialogue with the organisation needs to take place based on a review of the questionnaires, e.g., an email with feedback on what the organisation is doing well and areas for the organisation to work on in the future.

- Signatory organisations should be required to advertise their feedback mechanisms more openly on their websites and in annual reports and should be required to present template emails (complimenting and complaining) to facilitate other NGO and public feedback on their use of images and messages. The Dóchas secretariat could support organisations by drafting these templates.

Reward Mechanisms

- The idea of an annual award for organisations who are code compliant requires further exploration.

The Role of Dóchas

As the network that lends its name to the code and that has played a leadership role in this area in Ireland and in Europe, Dóchas continues to have a central role to play in encouraging and supporting signatory organisations to strengthen their implementation of the code of conduct on images and messages.

- The work the Dóchas secretariat is doing, e.g., liason with signatories, the annual feedback seminar, and the provision of resources on the Dóchas website should continue.

The task group recognises that Dóchas resources are limited, but in order to strengthen code implementation, it recommends that the Dóchas secretariat and board add the following to its support work:

- Development of the annual questionnaire should be advanced as identified above.
- The Dóchas secretariat is encouraged to create a working group for fundraisers within organisations to get together to reflect on the findings of the review and on their role in implementing the code at organisational level.
- Dóchas should appoint a 'code champion' among its board members.
- Minimum criteria for code signatories should be enhanced to include the following (*some of these criteria reflect recommendations identified above*):

- The appointment by signatory organisations of a code champion or champions and establishment of support mechanisms within the organisation for the champion

- Participation by senior managers of organisations in an annual meeting to

discuss code implementation

-Participation by senior managers in a webinar on best practice in development representations

-Participation by fundraising staff in an annual meeting or webinar on the code

-The code champion in each organisation to brief all staff on code implementation on an annual basis

-Organisations should be required to put in place a training plan for all staff, management and volunteers. At a minimum, organisations need to ensure that all staff, partners, volunteers and contractors/service providers (where relevant) receive a copy of the code and that training is provided to organisational staff and volunteers at induction

-Signatory organisations should be required to advertise their feedback mechanisms more openly on their websites and in annual reports and should be required to present template emails (complimenting and complaining) to facilitate public feedback on their use of images and messages.

- As such, the Dóchas board and secretariat need to continue to provide sufficient human and financial resources in this area to address the recommendations of the review, e.g., in addition to the Dóchas communications officer playing a central role in promotion of code implementation, the Dóchas programme officer can play an important role in the support of members in relation to code implementation.

Appendix A - Report of Workshop 1 - 15th March 2011 - 1.5 hours - 20 participants - Dublin

Summary

Opening the process in March 2011, the first workshop, with 20 participants was part of a Africa Centre Seminar - 'Beyond the Picture: Uncovering the Grey Areas of Images and Messages'. In this workshop (1.5 hours in length), code principles, as outlined in the 'we strive to statements' (listed in the code) were explored. The second part of the workshop addressed indicators for assessing code compliance. The final section of the workshop explored monitoring mechanisms which may need to be put in place to augment or replace existing monitoring mechanisms: completion of an annual survey and participation in an annual implementation seminar.

Part 1: Review of Principles of the Code of Conduct

This involved small group discussion and brainstorm of reactions to the principles in the Code of Conduct based on a review of 'we strive to' statements. Though there was broad agreement with the principles, with statements like; "a lot of work has gone into them", the "principles are good" and "the principles are fair and good", there was a general sense that there needed to be more guidelines on how to implement the principles in practice. One person highlighted that "it's important to consider how to do things, e.g., 'ensure that people can tell their own story'" and another pointed to the need for guidelines for implementation. Some were critical of the implicit assumptions in the principles, including the view that they are very "Northern focused", while others highlighted that they need to focus more on children's rights and on encouraging organisations to represent context. When focusing on how these 'we strive to' statements are presented in the code, overwhelmingly, participants were critical of statements as "too broad", "too subjective", "too vague", "open to interpretation" and in need of being "broken down" and "definition".

Part 2: Monitoring Criteria

Participants were asked to reflect on each of the principles and to identify images, words, captions, terms, labels, cartoons, videos and case studies which could or could not be used in relation to each with reference to 'the organisation and its work', 'where the organisation works and the work contexts', 'partners' and 'beneficiaries'. The purpose of this exercise was to illicit participants' understanding of the kinds of images and messages an organisation should or should not use. It was felt that this exercise would give a good insight into how the principles of the code of conduct could be implemented in practice and thereby identifying criteria for monitoring implementation, e.g., with reference to the principle of 'respect for equality of all people' the following suggestions emerged: "emphasise intercultural collaboration as opposed to the many ways the organisation can help" and "show people working together". With regard to the principle of 'respect for the dignity of the people concerned', it was suggested that images which portray "situations of pity" or "vulnerable images" should not be used and that we should "avoid using images that dehumanise, victimise or demonise" people.

Part 2. Feedback from Individual Work

Images [Labels, Captions, Pictures, Ads etc] and Text	Re: the Organisation and its Work	Re: Where the Organisation Works and the Work Context	Re: 'Partners' and so-called 'Beneficiaries'
That can be used	<p>Empathy</p> <p>Emphasise intercultural collaboration as opposed to the many ways the organisation can help</p> <p>Show an alternative way of understanding the issues - be clever and creative</p> <p>Rationale - addressing of audience rather than on an emotional level</p> <p>Use images that portray the organisation as a facilitator rather than an instructor</p> <p>Achievements, Track records, real case studies and history of organisation</p> <p>Work in equal partnership with an org in South and Southern personnel have presence in West</p> <p>Focus on 'what you can do' aspect and promote active engagement and participation with the issues instead of promoting the idea of throwing money at the problem</p> <p>Learning and developing</p> <p>Admit mistakes balanced with learning and adaptation</p> <p>Organisations work with people in humanitarian situations</p> <p>'GOAL and its partners do such and such'</p>	<p>Community agency - recognise that communities have their own coping strategies</p> <p>Show people working together</p> <p>Promote the positive work women in the community do to survive in difficult times</p> <p>Introduce the political problems to shame inept governments as opposed to shaming the vulnerable</p> <p>Contextualise specific country or circumstances/context</p> <p>Understand the culture and political dynamics of the communities involved</p> <p>Awareness through symbolism</p> <p>Do show genuine depiction of as many facets of the situation as possible - allow narrative to emerge rather than force it</p> <p>Images, captions and messages used should have exact places, organisations and work. Africa is a continent not a country. Name the country</p> <p>Show the complexity of the country/situation</p> <p>Give context - politics, history, culture</p> <p>Show images of modern factories, research facilities and institutes, universities, libraries, playgrounds, parks or local equivalent</p> <p>Yes, need for specification on the country rather than the continent as a whole</p> <p>Name good and bad things happening in an area and the contributors to them</p>	<p>Pictures should be used but at a time period and they should expire</p> <p>consult the person, people about how they wish to be portrayed</p> <p>local people working on local projects alongside partner that promotes sustainability</p> <p>Role models from previous 'beneficiaries'</p> <p>Work of orgs should highlight their progress and how that impacts on the life of 'beneficiaries' which we do not often see</p> <p>Abstract representations - not real people but representatives, cartoons etc</p> <p>Agents of their own future - help to help themselves</p> <p>Take the '9 grounds' into consideration</p> <p>Images that we would be comfortable using of ourselves</p> <p>Cannot say because what is acceptable or appealing to me may be unacceptable or offensive to someone else</p> <p>Actual subject telling their story and no narration or too much editing</p> <p>Don't mind so long as they are positive - but again it's open to personal interpretation</p> <p>Use images from or taken by partners or subjects of campaign - try to promote empathy not sympathy</p> <p>Positive messages</p> <p>Get permission</p>
That should not be used	<p>Staff wearing the T-shirt (with org logo) given priority in images</p> <p>'GOAL does such and such'</p> <p>Old pictures and statistics</p> <p>That its work will save all problems and the village won't survive without their presence</p> <p>No captions of fly infested children and no need for so-called 'black box from Trócaire'</p> <p>Orgs should not generalise their work, they should mention effect details</p> <p>Superiority - power</p> <p>For campaigning groups - try not to only focus on the negatives and 'wrongs' of the situation - try to be broad based and inclusive in approach. Avoid 'left' or 'right' wing language</p> <p>The 'white aid worker' shown in the active role alongside the black passive, helpless recipient of aid</p> <p>Charity is a terrible word</p> <p>Presenting staff/organisation as heroes - bringing salvation and solutions</p> <p>Do not assume that aid and development are necessarily good; encourage people to critically analyse</p>	<p>Yes images can be used. However, not in a way of portraying an entire continent in a negative way.</p> <p>Ideally countries should be named and not continents</p> <p>Don't depoliticise conflict or situations for the sake of broader appeal or government funding for your org</p> <p>Don't use 'Third World' - many people/orgs still do - 'Third' suggests a constant state</p> <p>Situation should be highlighted but not without a full explanation - people should not be photographed</p> <p>Org should not generalise but mention country and region they work in and the communities they are dealing with</p> <p>Framing situation only as a result of natural disasters (as opposed to pol, econ, ecological etc)</p> <p>Don't use women and babies images in famine - why not show the men who spend all their energy foraging for food?</p> <p>Do not assume that race and geography (i.e., Black Africa) necessarily constitutes vulnerability to suffering</p> <p>Don't show one white face among 20 black faces to indicate some kind of educational role</p> <p>No assumptions but facts</p> <p>Images that only show one depiction</p> <p>Don't compare a country to your own - show the complexity, inequality within the country you are looking at</p> <p>Don't imply that an entire continent, region or country is the same</p> <p>No country is made up only of refugee camps</p>	<p>Don't use photos if you can help it - use videos because they give more context</p> <p>Use photos of people taking about their own situations</p> <p>Don't use words like 'underdeveloped', 'poor'</p> <p>Outdated unsolicited images</p> <p>Situations of pity</p> <p>Vulnerable images</p> <p>Avoid using images that dehumanise, victimise or demonise</p> <p>Do not use images out of context and challenge situations where this occurs</p> <p>Do not assume that white equals benevolent partner, criticise the global political structure that produces inequalities</p> <p>Criticise the charitable model and promote individual agency - do not assume charity is always good or neutral</p> <p>Beneficiaries evokes charity model</p> <p>Caution with partnership that it is not imposed</p> <p>Donor v recipient relationship - inequitable relationship</p> <p>Vulnerable children</p> <p>Negativity - although this is open to interpretation</p> <p>Flyers which include images which credit and name prominent figures and celebrities while blatantly not acknowledging presence of recipients of aid/assistance</p> <p>Blunt, offensive statements - carry out full, adequate research</p> <p>No images of dying people - respect their dignity</p>

Part 3: Monitoring Mechanisms

In the light of current monitoring mechanisms: completion of an annual survey and participation in an annual implementation seminar, participants were invited, in groups, to reflect on a number of statements with regard to appropriate monitoring mechanisms for strengthening code implementation. General ideas emerged from this exercise including the need for a regulatory and governance process; promoting the Code as a quality brand; and appointing an independent review committee to oversee code implementation. With regard to the idea of 'naming and shaming' those who do not comply with the code's principles, it was generally agreed that organisations that are performing well should be 'named' but that 'shaming' organisations is not the way to go. It was felt that the idea of Irish Aid only funding those organisations who are code signatories should be considered but the difficulty is that organisations can be signatories without fully complying with the principles of the code.

Appendix B - Report of Workshop 2 - 11th May 2011 - 2.5 hours - 4 participants - Limerick

Summary

There was a disappointing attendance at the second workshop, held in Limerick, with just four participants. Despite this, some interesting points emerged with regard to the four main topics addressed: problems affecting the code; enforcement of the code; what Dóchas can do; and the question, 'has the code failed?'

Part 1 - Problems Affecting the Code

With regard to the 'problems affecting the code' participants highlighted the "Western perspective" which is taken as the "standard". Many of the issues raised related to the difficulty to enforce the code by NGOs in the context of media portrayal of development. The "practicability/workability of the code, taking into consideration the role of the media" was raised as an issue as was the point that "celebrity have to feature in pictures for the media to consider them worthy of being published. They are not concerned about small issues, such as drought, war etc., unless a celebrity is involved". A further point was raised that "the code is good, but images that tick all the points will be difficult for acceptance by the media".

Part 2 - Enforcement

With reference to the second point, enforcement, it was highlighted that "it is a weak code lacking the power of enforcement". One person called for a complaints procedure to be put in place which can be done "through easily accessible means, e.g., letter by post, e-mail etc", while another highlighted the need to have the code "simplified for the local community to understand. If it is not understood by the common people it will be difficult to enforce". There was a call to prosecute offenders.

Part 3 - The Role of Dóchas

On the issue of 'what Dóchas can do' a number of suggestions emerged. The importance of workshops on the code was mentioned, including the provision of resource packs and seminars and the organisation of conferences "that involve the media, organisations and the public". Dóchas was encouraged to communicate more and meet more regularly with organisations on the code and to encourage "more public awareness and debate on the code" or to organise "an aggressive campaign through the media". It was suggested that "people should be empowered to give feedback to organisations on the use of images". Dóchas should liaise with the advertising complaints commission and try to "influence Irish Aid and other funders not to fund organisations not complying with the code".

Part 4 - 'Has the Code Failed?'

With regard to the question of whether the code has failed or not, the group felt that the "code has not failed, but there is a long way for it to go, for it to be more relevant". This view was supported by others who argued that "the code has good value, but it needs to be made more practical and well-known to the people through the internet, debates and campaigns in the media".

Appendix C - Report of Workshop 3 - 23rd June 2011 - 2.5. hours - As Part of the Annual Feedback Meeting for Signatories to the Dóchas Code of Conduct on Images and Messages

Summary

The third workshop formed part of the annual feedback meeting of signatories to the code (2.5 hours) and there were 40 participants. This workshop focused on implementation of the code among signatory organisations (what is working well? Challenges in implementing the code at organisational level, 'ideas for implementation in the future', and reflection on experience of code implementation among some signatory organisations), and on how to strengthen the code within the Irish international development sector.

Part 1 - Implementation of the Code among Signatory Organisations

With regard to 'what is working well?', it was felt that newer organisations have been influenced by the code from the beginning. Where there are 'code champions' in place, it was felt that organisational implementation is stronger. The 'Visions of Africa' photographic exhibition, organised by KADE in Tralee was highlighted as allowing "for the celebration of complexity through images; there has been good media coverage of the exhibition and there has been space to reflect on the code within it". Other practices identified as working well were: "mention of the code in websites and publications"; "briefing volunteers on the code before they work overseas"; "having and using captions with photographs which is essential for providing context"; using a pseudonym instead of someone's real name in places and "working with partners".

When identifying implementation challenges, many issues emerged. These included child protection concerns: "how to use captions - appropriateness, especially with regard to child protection issues"; and "child protection more broadly... - does the code clash with child protection interests? What about consent in relation to children?" The issue of full consent was also raised in relation to in whose interests images and words are used. "Do people fully understand the implications of giving consent?" With regard to the use of photographs, the challenge for small organisations in sourcing photographs was identified as was the question of "photograph recycling - how long should images be in use?" One person asked whether organisations should use pictures at all. The broad challenge of regulating social media was also highlighted as were questions about interpretation of the code, with one person arguing that "interpretation of the code can be quite subjective as it's quite general and open to interpretation. Organisations can easily say that they are in compliance with the code when they may not be". The challenge of volunteers interpretation of the code was also raised as an issue, especially for those organisations working with many volunteers.

Many ideas for implementation in the future were introduced. These included the need to centralise communications within an organisation, the importance of training on the code for volunteers, and putting in place a review mechanism, where "not just one person [the code champion] [would be] responsible for code implementation within an organisation". The need to "apply the same standards to the use of images and messages overseas as we would in Ireland" was highlighted, as was the need to "do a self-audit and employ an external auditor". Participants called for support and new practice with regard to sourcing photographs: one person suggested the "need for a forum for sharing resources from field trips - perhaps share field trips between organisations or departments within larger organisations in order to reduce costs"; another suggested that a list of suppliers who are briefed on the code should be established, perhaps by Dóchas; and the practice of employing local staff to take photographs was suggested.

Three people offered a presentation on the challenges they experience with regard to code implementation within their organisations: Deirdre Finlay, VSO Ireland; Claire Quinlan, Oxfam Ireland and Ambrose Duffy, Concern Worldwide. Following their presentations, a number of challenges they identified were discussed: the level, detail and depth of information needed in

order to give context to an image/message or situation; and different interpretations of the code - “what one organisation thinks is code compliant may not be. Is there a set of criteria for assessing code compliance and giving guidance on it? Should it remain an open document which allows for various interpretations?” There were different views on each of these issues, with little agreement. The importance of the code remaining open to interpretation was highlighted by a few speakers, who felt that the code should not become a 'ticking box' exercise, or who identified the importance of using organisational interpretation of the code as a means of encouraging best practice. One person thought that organisations hide behind interpretation to allow them to do whatever they want, i.e., going against the spirit of the code.

With regard to the third discussion item, i.e., whether feedback mechanisms were working or not, it was thought that they are not working. Few organisations have ever received feedback on their use of images or messages from the public. Some people felt that it was difficult for signatory organisations to engage in critical feedback of other organisations' use of images and messages, especially within the context of a small sector. This was challenged by others who argued that if signatories are not willing to challenge each other, it is difficult to expect the public to. The suggestion was put forward that two template letters could be developed and put on each website - one for complimenting an organisation on its use of images and messages and the other which highlights some concern about its use of images and messages. This was thought to be stronger than the currently weak feedback mechanism (which requires someone to compose their own email to the identified code representative within an organisation), as it would provide the public with a more direct communication tool.

The final item highlighted was the need for communication channels within organisations relating to the code.

Part 2 - Strengthening the Code within the Irish International Development Sector

In the second part of the workshop, participants worked in groups to reflect on and provide responses to four possible scenarios for strengthening implementation of the code. The first scenario related to what should be done (within the organisation, by other signatories and by Dóchas) to address an 'extremely problematic advertising campaign' being run by an influential organisation that is a signatory to the code. The second explored the idea of a Dóchas review committee being established which would draw up an annual list of those organisations who are deemed code compliant. The third scenario focused on the idea of each signatory organisation presenting an annual report to Dóchas on its use of images and messages and the last case focused on a scenario where the code champion was the only person within the organisation taking the code seriously. Though management have signed up to the code, they have not put sufficient resources into “ensuring that the organisation modifies its communications and advertising in order to be code compliant”.

Each of these scenarios presented a variety of responses and suggestions.

With regard to the first scenario - on addressing a problematic advertising campaign undertaken by a signatory organisation, it was felt that within organisations staff should be able to address the issue with the person responsible, that organisations should be “continually reflecting on what they are doing right and wrong”, that there should be “internal debate” on the use of images and messages and that issues should be raised with the code champion. Other signatory organisations were encouraged to “contact the organisation directly” or to write to or contact Dóchas, who should contact an organisation on behalf of members. The idea of Dóchas having a complaints system was suggested, with one group arguing that “if an organisation repeatedly does not follow the code then they should not be supported by Dóchas as signatories to the Code”. Another group suggested that, though there should be a means of formally contacting organisations and providing feedback, “perhaps there should be a neutral, more tactful way of providing feedback/complaining, i.e., a constructive debate platform”. With regard to the role

of Dóchas in this scenario, one group felt that Dóchas should be influencing the advertising standards authority. Other groups thought that Dóchas had a role to play in the creation of a complaints system, while two groups thought that a peer review system, perhaps through an informal working group of Dóchas, might be a good idea. The overwhelming responses to the scenario were that there should be opportunities for internal debate and discussion within organisations on whether or not their use of images is code compliant, that signatory organisations have a responsibility to provide feedback to each other, either directly, through Dóchas, or through a constructive open forum, and that Dóchas had a strong role to play in influencing signatory organisations with regard to code compliance.

With regard to the second scenario, of a Dóchas review committee being established that would draw up an annual list of those organisations who are deemed code compliant, the general response from groups was that it is better to incentivise organisations to good practice rather than 'name and shame' good-practice or bad-practice organisations. While one group thought that it is a good idea to measure compliance, the idea of creating a list, even if only of code compliant organisations, was regarded as challenging. Given that the code is so open to interpretation, a point highlighted by three groups, it would be difficult to draw up such a list. It was also thought that such a list would be based on subjective judgement by a review committee (because of the lack of agreed indicators for code compliance). Another group thought that drawing up a list could be divisive unless the committee was independent. The idea of "public name and shame" was not regarded as a good idea by one group. Other groups generally agreed, with one group suggesting that "Dóchas should more focus on facilitating good compliance", and another suggesting that "we would rather examples of trends and best practice" rather than "naming and shaming". Two groups identified how difficult it is to "implement all the guidelines all the time" or for organisations to be "100% honest" when it comes to reflecting on their practice. One group argued for "incentives", perhaps an award scheme based on tangible examples of compliance.

The third scenario focused on the idea of each signatory organisation presenting an annual report to Dóchas on its use of images and messages. Some groups felt that this was a good idea, but others disagreed, highlighting practical difficulties. One group thought that the format of an annual report was not the best means of sharing their practice and examples with Dóchas and other signatories. They didn't think the idea of annual reporting on the use of images and messages would be successful. Another group indicated that while it might be possible for a small organisation, for a large organisation it would be too much work. This view was echoed by another group who felt that it might be a duplication of other reporting. One group, who thought it was a good idea, suggested that it would be possible to do a brief report with samples of materials, but that the information should be shared among signatories. They argued that "either Dóchas steps up monitoring and compliance responsibilities or it is put back to signatories to exert peer influence in a constructive way". The suggestion of adding questions to the existing annual questionnaire was highlighted as an alternative by many groups.

With regard to the last scenario - creating more 'ownership' of the code within organisations, groups agreed on the importance of the need for more awareness-raising and training and for management "buy in". The need for training for "all levels of an organisation" was highlighted, as was "cross-organisational training" and "adequate training especially at production level". With regard to management "buy in" a number of suggestions were put forward in order "to embed the code across an organisation": "webinars for management/directors"; "management as a champion. Senior management need to buy in through regular reviews. Some form of accountability mechanism [to be] approved by the senior management team"; and "the Dóchas CEO meeting [needs to] include a discussion on the importance of the code".

Appendix D - Workshop 4 - 13th October 2011 - 4 hours - Workshop on Illustrative Guidelines and Mechanisms for Strengthening Code Implementation

Summary

The last workshop, with 20 participants, was designed to develop indicators of the kinds of images and messages which would show code compliance or not, with a view to helping to develop the illustrative guidelines. Advice on how to develop the illustrative guidelines was also sought. The second part of the workshop focused on identifying priorities with regard to suggestions for strengthening code implementation (most of which were identified in previous workshops) and exploring their implications in practice.

Part 1 - Indicators and Developing the Illustrative Guidelines

With regard to indicators, in groups, participants were asked to identify words associated with 'good practice', 'grey area practice' and 'bad practice', with reference to code principles as outlined in the 'we strive to' statements in the code. [See table below] In the general discussion, questions about the use of terms such as 'the developing world' arose. It was suggested that terms used, such as 'the Majority World', 'developing world' etc would need to be clarified in the new guidelines. One suggestion was that organisations should try to be country-specific instead of generalising countries into terms such as 'developing countries'. Participants highlighted that though words are important, it is often the context in which they are used which determines whether they are code compliant or not, e.g., the same word can have different meanings depending on how they are used in different sentences. There was some discussion of how much the public understand the words used by development organisations. One person felt that development jargon should be simplified, whereas another argued that whatever terminology is used should be explained to the public in order to deepen their understanding. A question was raised about whether or not code compliant images and messages lead to a drop in fundraising. No conclusions were arrived at in this regard. Another person questioned how Irish sections of international organisations can be code compliant if their 'head office' is operating from different principles. Again, this was raised as a challenge without conclusion.

Suggestions were put forward on how to develop the illustrative guidelines for the code of conduct.

Good guidelines-what can we learn from other guidelines?

1. Clear Do's and Don'ts-good, bad and grey area
2. Guidelines need to be technical and precise, concise straightforward and no jargon
3. Guidelines should be web based-links, videos and images could be accessed as examples.
4. Cartoons could be used if done properly
5. There should be a facility to share good and bad practice examples
6. Illustrate same scenario on the 3 levels of compliance
7. Have a short and long version available; have more in-depth guidelines for those directly involved in choosing images
8. On-line training/webinars to support guidelines
9. Computer generated graphics
10. Describe why it's good or bad
11. Colourful
12. A version with child-friendly language
13. Clear and simple
14. A summary for quick access
15. Something that you can give to partners
16. EU Toolkit for diversity (Media Institute for Diversity) is helpful
17. Guidelines should include consent form and how to communicate it to person, checklist of indicators
18. Template captions, words, sentences

19. Reflect how communication has changed-social networking-there should be specific guidelines
20. Separate emergency guidelines-images be different

Part 2 - Strengthening Code Implementation

The second part of the workshop focused on identifying priorities with regard to suggestions for strengthening code implementation (most of which were identified in previous workshops) and exploring their implications in practice. Suggestions were grouped into three types, i.e., 'support' (6 identified), 'monitoring and review' (4 identified) and 'reward' (3 identified), with 13 suggestions in all, e.g., webinars for managers, seminars and conferences, peer review, additional questions to the questionnaire and an annual award for an organisation. Participants were asked, individually, to rank each group in terms of how they would enhance code implementation within the sector and then to identify their top 5 from among all the suggestions. A general discussion of priorities followed.

From individual ranking of each element within the groups of suggestions, in terms of support 'webinars for managers, seminars, conferences etc' and 'more targeted training, e.g., for marketing personnel, for promotions etc' were the two top ranking suggestions. These were also regarded as among the top 3 priorities overall. With regard to monitoring and review, peer review and adding questions to the annual questionnaire were regarded as the two most important monitoring and review suggestions, with peer review also one of the top 3 priorities overall. With regard to the area of reward, a quality mark and an 'annual certificate for all signatories showing level of compliance' were the two top priorities (albeit out of 3).

In the general discussion, some of the suggestions prioritised were addressed. Again, there was general agreement that webinars were useful as they would be "important for getting buy in from managers". There was also consensus on the need for "more targeted training", with comments that "there needs to be a data base of skilled photographers; important for supporters, volunteers etc to have training; should cover issues such as visual literacy and photo ethics; need to look at organisation specific training where training is accompanied by policy development". It was argued that the annual meeting could be linked to a peer review process, though 7 participants thought that a peer review process would not work, with 13 arguing that it might work but that it would need more thought before it could be implemented. The idea of strengthening the annual questionnaire was regarded highly as it is "important to encourage self-assessment", though there are "issues about who fills out the questionnaire". It was suggested that answers should not come in the form of 'yes/no' answers but show progression. Most people thought that it was a good idea to have some type of a reward mechanism, though 3 (of 20) thought it was a bad idea. Its advantages were highlighted as "it raises awareness and encourages self-assessment, improved practice and buy-in from management". It was suggested that organisations should apply for it.

Overall, the ranking exercise and discussion suggested that in terms of support, there is considerable concern to get buy-in from management. Webinars and Dóchas management meetings were seen as a good way to achieve this. More targeted training was regarded as important, building up a databas of skilled and trained resource people. In terms of monitoring and review, though many people favoured the idea of peer review, practical issues would need further exploration. The idea of adding questions on self-assessment on code compliance to the annual Dóchas questionnaire was highly favoured as a practical and implementable measure. In terms of reward, most were in favour of some form of a reward mechanism, though some thought it was a bad idea. There was general consensus that if there were a reward system, it should coincide with the annual meeting.

In groups, the implications of various suggestions were explored in greater detail in terms of how they might work in a realistic and constructive manner. Group 1 adressed the area of 'support'.

They focused on 'webinars for managers, seminars, conferences etc' tied to 'research' and 'more targeted training'. They did not explore the other support suggestions of 'annual meeting - reporting and learning', the 'Dóchas website - resources', an 'Irish Aid question in applications for programme funding regarding being a code signatory' or 'child protection guidelines'. With regard to webinars, seminars etc they suggested that webinars would be held early in the morning and that they should be run by a manager. Webinars could be accompanied by an instructive video and they would not have to be a one-off training but there could be follow up, perhaps through the Dóchas task group. For board members, it was thought that there should be more targeted, short training. The idea of developing an app for management training was put forward. This idea was developed in relation to 'more targeted training' where training for managers and the board could perhaps be provided in consultation with Dóchas at a board meeting. The need for training for people involved in various work areas within organisations or the sector was highlighted, e.g., campaigns/advocacy; volunteers - "pre-departure training, here in Ireland also, online training"; development education - "part of discussion with other groups, trained to train others"; and fundraising/communications and marketing - practical training for "photographers, cameramen, graphic designers, web developers - create a database of people who have training". It was suggested that signatories could do training remotely, that training needs to be practical and that 'partners' need to be given a "copy of guidelines" and involved in discussions or video/webinars.

The second group addressed the area of 'monitoring and review'. They focused on the ideas of 'peer review' and additional questions being added to the annual Dóchas questionnaire. They did not address the other reward suggestions of 'organisations re-applying as a signatory after 5 years' or 'feedback mechanisms - providing a template'. With regard to peer review, the suggestion again emerged that it should be linked to the annual Dóchas feedback meeting. It was felt that organisations should be tiered "for equity in the peer group". A peer review should review materials over a time-bound period, perhaps of 6 months or a year. Questions were raised about whether the peer review process should be anonymous or not or whether there should be recognition of the results or just feedback from the peer review process. There was a question about who would select the material to be reviewed or whether the process should be undertaken in focus groups or involve the general public. There were few clear guidelines on how the process should be undertaken from this group.

With regard to adding additional questions to the annual Dóchas questionnaire, the group recommended that the Australian PQASSO/ACFID system of scoring be applied (See <http://www.acfid.asn.au/code-of-conduct/signatory-tools/tools>). This, it was argued, offers an "opportunity for support between organisations [and] encourages organisations to think about how to be compliant". It was suggested that, with this different scoring system, "practical implementation would be demonstrated/progressed". The group argued that buy-in from management should be evaluated in the questions, as should buy-in from board, targeted training and that there should be an additional question regarding extra work done in the past year to implement the code.

The third group focused on the idea of an 'annual award given to one organisation' as one of the 'reward' suggestions. They did not address the suggestions of 'quality mark' or an 'annual certificate for all signatories showing level of compliance'. They suggested that it should be part of the outcome of the peer review. Organisations should apply for the award providing examples of their work, a "suite of materials". This should be undertaken by an independent panel based on a checklist of indicators. With peer recognition, it was thought that it would be a useful "carrot approach" and that, with peer recognition, it would lead to management buy-in, tangible outcomes and raise awareness. The award, they suggested, should be given at the annual Dóchas feedback meeting.

Appendix E - Consultation Meeting - 17th February 2012 - 3 hours - Meeting with Code Specialists among Signatory Organisations

A consultation meeting was held with 10 code specialists among signatory organisations to discuss the draft review report (based on the 4 workshops) in February 2012. At this meeting, many views were expressed, most of which re-iterated or put emphasis on specific points which were raised at the workshops, but which were not strongly enough identified in the draft report.

The need to provide a practical context for code implementation within the international development sector in Ireland was highlighted on numerous occasions, and points of context identified in section 1.1. (above) are largely drawn from the discussion at this meeting, though they also reflect points highlighted at workshops (see appendices). The need for further research on code implementation and on signatories' use of images and messages was identified.

Participants re-iterated the need for management 'buy-in' to the code in order to ensure its implementation within the sector. This, in addition to the importance of encouraging fundraisers' ownership of the code, was regarded as essential if the review process is to have any success in addressing its aim of strengthening code implementation within the sector. The need for training on the code at all levels of organisations was also re-iterated as was the need to re-visit child protection guidelines and legal issues with regard to code implementation. This issue had been addressed in early workshops but was not prioritised by participants in later ones. The meeting re-affirmed the value of organisational self-reflection as a monitoring and review mechanism through strengthening the annual Dóchas survey/questionnaire as outlined below.

A key finding from the consultation workshop was the need to strengthen minimum code compliance requirements and many recommendations were made in this regard (see section 5). The role of Dóchas was regarded as central to supporting the strengthening of code implementation, though there was a recognition that the term 'Dóchas' does not only refer to the Dóchas secretariat. There was consensus at the meeting that the Dóchas board can play a significant role, especially in relation to encouraging management 'buy-in' and in prioritising the code in relation to the human and financial resources required at secretariat level in order to further support its implementation among members and among signatories more broadly. The consensus was that while there is shared responsibility among signatories, members, secretariat and board alike, the Dóchas board has a key leadership role to play in strengthening code implementation.