

**Report on the Review of the
Code of Conduct: Images and Messages
relating to the Third World**

**Presented to
Dóchas Development Education Working Group
by Siobhán McGee
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“Our choices are driven by our organisational values”.

“There is always a tension between the kind of image that brings in the money and one that doesn't demean the subjects of the photo”

“What if the stereotypical images of starving children remain the images most capable of being used to mobilise a response?”

“The same criteria should be used for the people of the north and of the south. For example if we do not publish a picture of Finnish car accident victim neither should we publish a picture of Indian tsunami victim”.

“Revision of the Code is very timely given Live8, Make Poverty History and the debate about major reforms within the EU”.

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1 Background and Introduction

The General Assembly of European NGO's adopted a Code of Conduct on Images and Messages relating to the Third World (the Code) in April 1989. The Code was written in order to challenge and guide NGOs to be attentive to messages that over-simplify or over concentrate on sensational aspects of life in the Third World, whether in education, public relations or fundraising activities.

During a European gathering of development education practitioners in 2004, it was agreed that it was useful to review and update the Code. The Irish platform (Dóchas) agreed to lead the process and decided to conduct initial research and make recommendations leading to an updated and more inclusive Code of Conduct.

The period of this initial research was 1st June – 1st July 2005.

The key task was to conduct research leading to a report outlining recommendations for:

1. A revised and more inclusive Code of Conduct
2. Methods for monitoring and evaluating the Code
3. The setting up of a Standard of Recommended Practice

This was to be achieved by:

1. Critiquing the 1989 Code of Conduct, other relevant Codes and background papers
2. Gathering input from members of the Dóchas Development Education and Humanitarian Working Groups and national platforms in Europe through the Development Education Exchange in Europe Project (DEEEP) secretariat
3. Gathering input from stakeholders

Stakeholders were identified as members of the Dóchas Development Education Group, members of national platforms in Europe, accessed through the Development Education Exchange in Europe Project (DEEEP) secretariat in Brussels, members of the media, fundraising and communications professionals, academics and funders.

2 Methodology

Based on the initial work plan (see Appendix B) and working with the lead contact person within the Dóchas Development Education Group, a list of stakeholders was compiled and agreed and a questionnaire was drawn up. The purpose of the questionnaire (see Appendix A) was to establish the basis for wider discussions between, and feedback from, a range of practitioners at organisation and platform level across Europe.

The 'open space technology' period at the DEEEP summer school in Sweden in June was availed of by the Irish participant to reach those attending. A discussion was facilitated based on the questionnaire, feedback from which was fed into this report.

The questionnaire was circulated through the DEEEP secretariat to the Development Education Groups of all European national platforms, and recipients were encouraged to circulate it as widely as possible within their own organisations and networks.

Direct contact was established with the stakeholder groups (fundraising, media, funders, communications and academics). This was not as straightforward as accessing Development Education practitioners as there are fewer networks for the other stakeholders. Engagement with those stakeholders was therefore mostly on a one to one basis, in person, by email and over the phone.

An open meeting was held in Dublin on 21st June with attendees representing development education, communications and fundraising perspectives.

A brief review of other Codes and related material was undertaken.

Twenty-five questionnaires were completed and returned. Further discussions were held with twenty-five individuals (see Appendix E).

3 Key Findings

The research found low awareness of the existence of the Code across all the stakeholder groups. Where the Code was known of, few people could source an actual copy of the document. Almost all the feedback received focused on images and there was very little consideration of messages in this context.

At the same time, there is a high level of awareness of the responsibility of choices around images and the fact that these choices are not neutral acts.

Where people were aware of the current Code there was agreement that its formation and introduction served to stimulate debate and created high awareness of the issues. It was argued that the legacy of that debate is what now contributes to the existing awareness of this subject.

In general people say that the choices they make on a day-to-day basis about images and messages are derived not from a Code but from an inherent 'knowledge' of what is acceptable and appropriate in their own organisation. The sense is that the prevailing value system informs the choices that people make while at the same time the existence of a written Code is beneficial to underpin awareness of the existence of industry standards.

Many of the larger NGOs who responded have their own Codes, however most organisations do not have a written Code. Research shows that half the NGOs in Britain claimed have their own picture policy however only 15% had a written policy (Clark, 2003).

While there is general agreement on the importance of the content of the Code; it is recognised that the context has changed and that its language is dated and inappropriate.

There was agreement that the Code should be updated and be cognisant of current issues and challenges. There is a strong and widespread sense that in updating the Code, the process must be inclusive of all stakeholders.

There is a general sense that there has been some regression in this area in recent years. This may be due to the fact that many current staff were not involved in the debates of 15-20 years ago. It could also be attributable to a more competitive fundraising environment.

Research undertaken (Clark, 1993, 2003) looked at the changes in images used by British NGOs in their communications over the decade and revealed that although 60% of the organisations surveyed in 2003 claimed they had changed the way they use images over the past ten years, there was very little statistical difference in how NGOs use images.

As well as addressing images and messages, guidelines are required about how case studies are collected and translated, including guidelines about how long they are used for. It is felt that the people interviewed and/or photographed have the right to know the context in which their interviews/photos will be used (and give or refuse the permission for such use). The "copyright" or ownership of the pictures and materials should be negotiated with partners. For images, the question goes beyond how images are taken and getting permission. The relative power of beneficiaries is low therefore even if permission is granted it may not be fully voluntary if their livelihood is associated with the requesting NGO.

The overwhelming feedback was that progress towards the institutionalisation of the current Code was impeded due to lack of structured guidance and investment on the part of NGOs in communicating, monitoring and evaluating the Code.

There was broad agreement that when a new Code is agreed, a coherent training and communication strategy should be devised along side it which could be implemented at national and local level by each national platform and within each organisation.

It was suggested that a more concise Code, focusing on 'guiding principles' and complemented by a supporting paper expanding on each of the principles would be useful. The 1994 Red Cross Red Crescent / NGO Code was cited as an example. It was felt that this approach would be more accessible and less likely to date. It

was widely suggested that a positive tone be adopted based on encouraging organisations to reach the standards.

It is seen that the strength of this Code is that it emerged from within the sector itself, and it was argued that this strength should be protected. The leading role adopted by DEEEP in this process was acknowledged, while at the same time it was felt that the ongoing process ought to ensure engagement with a wide range of stakeholders beyond those in development education. It was thought that CONCORD might be an appropriate setting within which the next stages could be progressed. The importance of ensuring new member states engage in the process is recognised and it is suggested that TRIALOG provides an opportunity to facilitate that.

Regarding monitoring and evaluation, it was preferred that compliance remains voluntary as it was seen that NGOs as far as possible should retain responsibility for setting standards for their own activities. There was support for social auditing especially if institutionalised. Peer review was seen as being potentially a divisive rather than an affirming approach, which could create dissension between organisations. The suggestion regarding making compliance to the Code a requirement for co-funding (as in the Australian situation) was not preferred on the basis that it would impact negatively on the independence of the relationship between NGOs and co-funders. The Australian experience could however be further researched to enable a better understanding of the impact that policy has had on practice.

From discussions with the Broadcasting Commission of Ireland (BCI) it emerged that they will embark in autumn 2005 on a consultation process with members of the public on the subject of 'taste and decency' in broadcasts by Irish media. Depending on the terms of reference this may be a process relevant to this debate and one with which Dóchas and / or NGOs may wish to engage.

It was widely remarked that a revision of the Code is timely, given Live8, the Make Poverty History campaign and the current debate about major reforms within the EU.

4 Analysis

This consultation reaffirms the importance of message and image standards and provides an opportunity to begin what would be for many a new dialogue between the fundraising, development education, campaigning, international development co-operation, media and humanitarian aid personnel in NGOs. Many of the respondents said that they would welcome that opportunity. It reaffirms the importance of NGOs assuming responsibility for this area and should also provide the expanded European NGO movement with a health check on the subject.

A dominant theme emerged of a positive - negative dichotomy regarding images in particular. There are significant differences between people (often within the same organisations) about what is acceptable or not in this regard. A NGO's policy choices will ultimately determine its actions in regard to images and messages. No matter what the activity, the key stakeholder in this debate lies with those within NGOs who affect how policy is agreed and implemented in organisations. Some stakeholders felt that their views and those of the overall organisation perspective were not aligned. A process to encourage organisations to have these internal debates would be welcomed.

The classification of 'negative' images doesn't take into account that an image in its own right is neutral; it is the subjectivity of the viewer that translates it. It also doesn't appreciate the context that surrounds an image – that is the information given that explains and contextualises the image. Without the context explained, the image may be misleading and wrongly generalised. The focus on images in this discussion overlooks the particular importance of the context within which images are placed, the written communications that go along with them, and long-term communications messages of the organisations concerned (Manzo 2005).

The typical NGO image, that of an unsmiling baby is, it is argued, is an effective way to move people to action, usually to contribute financial support. Whether or not people then move to policy action depends on two factors: a) the extent to which the images themselves are accompanied by political demands for action; and b) the wider policy context in which demands for change occur (ibid). This places the

responsibility within the sphere of influence of the NGO. The use of the image can therefore be assessed, not only as a one-off, but also in how it is put to the cause of meaningful change over time.

Notwithstanding the communications efforts by NGOs, research of the public in OECD DAC member countries has established that the media, in particular TV, is the dominant factor in shaping peoples understanding of the developing world (McDonnell et al 2003). Therefore, while it is essential that NGOs make every effort to act responsibly in their own communications, the role of the media is worth noting in this context. Organisations formed to engage directly with the media at policy level (i.e. The International Broadcasting Trust and 3WE in the UK, CONNECT in Ireland) may provide a location whereby dialogue about the media's role in this regard can take place.

The shift from policy to implementation or from principles to practice is widely agreed to be where the 1989 Code fell down. The absence of independent monitoring is perhaps consistent with the voluntary nature of the Code, which relies on the organisation's own motivation to comply. Missing however is supportive and practical guiding information for organisations on how the Code could become owned and institutionalised by signatories along with steps for self-evaluation.

A review of other Codes¹ outlined in section 6 highlights the value of investing in structures and systems to implement, monitor and evaluate a Code, and to provide practical support to assist organisations to achieve the standards.

Missing in this debate so far is any sense of views from the south, and in particular those of the subjects involved. Some interviews in Ethiopia (Clark 2003) indicate that the interviewees who were subjects of photographs were glad that they had the opportunity to help their situation. However this research is limited in scale and the relative power between the interviewee and interviewer has to be recognised.

¹ The People in Aid Code of Good Practice in the management and support of aid personnel; the Australian Council for International Development (ACFID) Code of Conduct for NGOs; the Code of Conduct of the Red Cross and Red Crescent Movement and NGOs in Disaster Relief; the NGDO Charter; and the UN Convention on the Rights of the Child.

5 Changes in the context since 1989

The EU has an additional 10 new member states, with 2 more imminent in 2007, each bringing different sets of experiences of development, civil society and the media. Europe in general is becoming increasingly culturally diverse as a result of immigration.

There is now a wider awareness of and support for a rights based approach to development. The UN Convention on the Rights of the Child (CRC), which was approved by the UN in 1989, makes journalists, reporters, photographers, and film and documentary makers legally accountable to children for how they picture or address them. Moreover the CRC says that children and young people should always be heard on all matters affecting them.

This Convention, alongside the 1979 Convention on the Elimination of All forms of Discrimination Against Women (CEDAW) establishes the rights based framework of women and children. Given that women and children feature most prominently in images and messages emanating from NGOs, these conventions have particular relevance for NGOs.

In tandem with the advance of a rights based approach, there has been a shift by many northern NGOs from a charity to a partnership approach, resulting in less reliance on northern staff and more emphasis on inputs and voices from the south.

The advance of communications and digital technology has reduced NGO reliance on professional photographers, and means that organisations use their own staff more often to take photos. Improved communications technology also brings the increased possibility to clarify the source and context of the images being used. More information is generally available on development issues, often through the web, and this brings an improved opportunity to view a range of communications.

The Code of Conduct of the Red Cross and Red Crescent Movement and NGOs in Disaster Relief was introduced in 1994, and includes the principle "In our information, publicity and advertising activities we shall recognise disaster victims as dignified

human beings, not objects of pity". This principle, taken together with the other nine, form another voluntary Code that places priority on adherence to high standards on NGOs, the Red Cross Red Crescent Movement and international organisations.

In June 2003, the Good Humanitarian Donorship initiative was launched at an international meeting of donor government in Stockholm, Sweden. The meeting involved representatives of donor governments, UN agencies, the International Red Cross and Red Crescent Movement and other organisations involved in humanitarian action. Donors agreed on a set of shared, commonly agreed objectives for, and a definition of, humanitarian action, as well as a set of general principles and good practice for good donorship. The following principles are particularly relevant:

Principle 15 "Request that implementing humanitarian organisations fully adhere to good practice and are committed to promoting accountability, efficiency and effectiveness in promoting humanitarian action"

Principle 16 "Promote the use of Inter-Agency Standing Committee guidelines and principles on humanitarian activities, the Guiding Principles on Internal Displacement and the 1994 Code of Conduct of the Red Cross and Red Crescent Movement and NGOs in Disaster Relief".

This affirmation by donor governments of the Red Cross Red Crescent / NGO Code is significant and was referred to by donors in discussions. How these principles are measured and evaluated by donors will be important to this debate.

6 Review of other Codes

A review of a number of other Codes and a UN Convention was undertaken to see if they present any pertinent learning regarding this Code². Of particular interest was the process by which other Codes are supported, monitored and evaluated and the following were reviewed in more detail on that basis.

6.1 The Australian Council for International Development (ACFID), the independent coordinating body for Australian NGOs, administers a Code, which the Australian Government's Department for Development Cooperation established for NGOs in 1997. As well as administering the Code, ACFID provides information, training and coordination services to its members. It also represents the concerns of aid agencies to governments and other bodies.

The Code sets standards on how organisations are managed, how they communicate with the public and how they spend the funds they raise. To become a member of ACFID an NGO must sign the Code, and an NGO must have signed the Code to be eligible to apply for government funds through AusAID.

Writing in 2004 in her then role as ACFID Director of Standards and Development Practice, Rhonda Chapman remarked 'embarking on a Code is not a one-off exercise – it only works when we commit resources and treat it as dynamic and as a capacity building tool. We constantly need to revise and develop the Code itself, and the associated Guidelines (new in September 2003). Our commitment to training, capacity building and continuous improvement is critical' (Chapman in email, 2004).

6.2 The People in Aid (PIA) Code of Good Practice was introduced initially in 1997 to assist agencies to improve their human resource management and enhance their capacity to fulfil their mission. The PIA Code, revised in 2003, has an 'Implementing the Code' process through which agencies can review their human

² Other Codes reviewed but not detailed here include: A common approach to Child Protection for International NGOs; Child Sponsorship Standards; NGO Code of Conduct on Food Aid and Food Security; Code of Good Practice for NGOs responding to HIV/AIDS; Code of Practice of the Irish Fundraising Forum for Direct Recruitment, Code of Ethics of the Institute of Engineers in Ireland.

resource management, decide on improvements needed and gain recognition for doing so.

The process is described as one that encourages and supports an agency to fulfil its own aspirations rather than reach established standards. It is based on giving evidence of quality in HR practice to stakeholders. Recognition comes through kite marks in the form of strap lines, which are awarded by PIA. There are 2 stages in the implementation process.

The first kite mark, at the outset of the process, allows the agency to state 'Committed to the People in Aid Code' in its materials. This is awarded when:

- a. A public commitment to the Code has been made by either the Chief Executive or Chair to the Code,
- b. An implementing team has been appointed to oversee the implementation of the Code, and
- c. The agency has informed staff that they are committed to the People in Aid Code.

At an agreed time and once the implementation is well underway an external social auditor will audit the process, this will be repeated every three years. When PIA judges that an agency has met the requisites of the Code, the agency is allowed to use the strap line "Verified Compliant with the People in Aid Code".

6.3 The Code of Conduct of the Red Cross and Red Crescent Movement and NGOs in Disaster Relief was introduced in 1994. The Code is voluntary and places priority on adherence to high standards in disaster relief, and has 289 signatory organisations (figures from July 2004). The Code states in Principle 10: "In our information, publicity and advertising activities we shall recognise disaster victims as dignified human beings, not objects of pity". This principle, taken together with the other nine, forms the voluntary Code.

This Code was evaluated in 2004 on its 10th anniversary (Hilhorst 2004) and was judged to be valuable to organisations given that there were then 289 signatories. It

was also judged to be 'free floating' because of the lack of management processes to support it. This lack is seen to lead to several problems, including:

1. Ownership of the Code is not established
2. There is no central list or verification of signatories
3. There is no opportunity to discuss what being a signatory means
4. There is no place to resort to regarding non-compliance and no mechanism to deal with compliance
5. There is no forum to discuss questions or interpretations
6. There is no opportunity to review, evolve or amend the Code

The review concluded that a 'light guardian mechanism' was needed to keep the Code alive, and that this should be achieved by establishing a representative committee with revolving membership.

6.4 UN Convention on the Rights of the Child (CRC)

While a Convention and not a Code, the CRC is worth looking at in terms of the move toward setting standards and measures, and as a guide to policy making for national governments in a rights based context.

Built on varied legal systems and cultural traditions, the CRC is a universally agreed set of non-negotiable standards and obligations. It spells out the basic human rights that children everywhere – without discrimination – have: the right to survival; to develop to the fullest; to protection from harmful influences, abuse and exploitation; and to participate fully in family, cultural and social life. The Convention protects children's rights by setting standards in health care, education and legal, civil and social services. These standards are benchmarks against which progress can be assessed. States that are party to the Convention are obliged to develop and undertake all actions and policies in the light of the best interests of the child.

The UN Convention on the Rights of the Child is the first legally binding international instrument to incorporate the full range of human rights – civil and political rights as well as economic, social and cultural rights.

By ratifying the Convention, States commit to undertaking "all appropriate legislative, administrative and other measures for the implementation of the rights

recognized in the Convention" and to reporting on such measures to the Committee on the Rights of the Child. The Committee is an internationally elected body of experts charged with monitoring States' implementation of the Convention and reviewing and commenting on the States' reports.

In its reviews, the Committee urges all levels of government to use the Convention as a guide in policy-making and implementation, to:

- Develop a comprehensive national agenda
- Develop permanent bodies or mechanisms to promote coordination, monitoring and evaluation of activities throughout all sectors of government
- Ensure that all legislation is fully compatible with the Convention by incorporating it into domestic law or ensuring that its principles take precedence in cases of conflict with national legislation.
- Make children visible in policy development processes throughout government by introducing child impact assessments
- Analyse government spending to determine the portion of public funds spent on children and to ensure that these resources are being used effectively.
- Ensure that sufficient data are collected and used to improve the situation of all children in each jurisdiction.
- Raise awareness and disseminate information on the Convention by providing training to all those involved in government policy-making and working with or for children.
- Involve civil society – including children themselves – in the process of implementing and raising awareness of child rights.
- Set up independent statutory offices – ombudspersons, commissions or other institutions – to promote and protect children's rights.

6.5 The NGDO Charter was introduced in 1997 by the Liaison Committee of Development NGOs to the European Union in response to a debate about the quality and accountability of NGDO work. It was created to outline the values, approaches and structures of NGDOs in the then 15 member states, and to provide a 'guide' as to what the term 'NGDO' is understood to mean by NGDOs themselves.

The Charter was also seen as a guide for institutional donors to better understand the nature of NGDOs and their added value in development. The Charter

recognises that not all NGDOs will have the characteristics presented; it presents an outline of what NGDOs aspire to and work towards.

As well as articulating the basic principles of NGDOs, the Charter attempts to link principles and practice by outlining where persons external to the organisations could identify the principles outlined. The Charter itself is description of a set of aspirations and has an external focus; its principles may also serve as a set of principles that NGDOs could apply in running their own organisations.

In conclusion, varying experiences in the implementation of these other models suggests that some ongoing investment is essential to ensure that a Code remains a living and relevant instrument for organisations.

Indeed when this Code was created an implementation strategy was envisaged at national levels, including training days; the formulation within NGOs of their own Codes; the publication of development education training packs on the subject of images; and developing a dialogue with media through discussions with broadcasters (through for example the International Broadcasting Trust in the UK). These were to happen nationally (and did to varying degrees at the time) and in joint European initiatives. (This information is drawn from communication with Peter Davis of Oxfam GB).

Some of these Codes are significantly well resourced (PIA and ACFID), and see themselves as responsive and dynamic. Of those looked at here, perhaps the most 'free floating' Code, the Red Cross Red Crescent / NGO Code is now arguing for a structure to oversee its future implementation and ensure its ongoing relevance.

While resources are the issue, an answer may be to look at developing a set of supporting tools in the form of templates that are available to NGOs online, such as for example a self-assessment tool, pro-forma annual reports and checklists as are available online through ACFID (See Appendix C for an example drawn from 'A Common Approach to Child Protection for International NGOs').

7 Direct suggestions regarding the current Code

There were few direct suggestions about a revised Code; those that were received are re-produced here.

- A more concise Code was argued for, that removes the surrounding information and limits itself to the provision of practical guidelines.
- It was suggested that the Preamble is not necessary and can be removed.
- It was suggested that the statement approved by the Development Education Forum during the 2004 annual meeting and endorsed by CONCORD during the General Assembly of November 2004 should replace the introduction. However this would place a development education overview on the document, which may not be inclusive of all stakeholder perspectives.
- The term Third World has to be removed, however there is no agreement on the replacement term. Alternative terms suggested were 'the south', 'the developing world' and 'the majority world'.
- It was suggested that a positive language replace terms such as exhortations to 'avoid' certain activities.
- It was suggested that there is no need to single out fundraisers for particular attention, instead the Code should apply to all relevant staff of NGOs.
- It was suggested that instead of 'calling on European NGOs to....' the Code should be written as a statement of what the signatories have agreed to or aspire and commit to do.
- It was suggested that the content of the section 'NGOs should work towards' is not directly relevant to this particular subject area.

- Regarding point 11 in the Practical Guidelines, it was suggested that consultation is inadequate as it falls short of partnership, which is what NGOs aim for in their relationships.
- It was suggested that a set of Guiding Principles be devised as an alternative to the Code. For example it might say: "In our communications we will always.....
 - Be respectful of the personal dignity of the people we feature
 - Tell the truth
 - Avoid ambiguity
 - Avoid sensationalism
 - Do no harm
 - Use images and case studies only with full understanding and permission of the subjects
 - Choose our images and messages based on promoting equality, partnership and dignity
 - Not use images that are out of date or which belong to another situation
 - Use local photographers where possible (provided the quality is of sufficient standard)
 - Credit the photographers and sources
 - Establish if the subjects wish to be named or identifiable and act accordingly
 - Conform to the highest standards in relation to child protection and children's rights
 - Ensure that images and messages are coherent and consistent with organisational policies and objectives"
- This would be supported by an explanatory document giving specific guidance to practitioners to enable them to interpret and contextualise the Principles.
- The Principles could be an easy to use checklist against which staff in organisations can readily refer to before finalising publications, placing images on websites, etc and which can be easily understood by agency staff, suppliers (including designers and creative agencies) and the media alike.

- It was suggested that the revision must ensure the language is contemporary, easy to translate and that it is gender and ethnicity proofed.

- It was suggested that it would be useful by clarify what 'signing on' to the Code would mean in practice for NGOs. Perhaps a statement for NGOs might contain:
 - Our responsibilities as a signatory NGO to this Code is to....
 - We are accountable in our communications as follows....
 - We will state this commitment in all our public policy statements
 - We commit to conduct a self-audit every year
 - We will include reference to the Code in our employment contracts, and in our induction and training programmes
 - We will include the Code in our contracts with all relevant suppliers (i.e. advertising agencies, communications consultants, marketing specialists)
 - We will make a public feedback mechanism available

- The Code should be designed so that NGOs will embrace it as a resource and an enabler.

- Consider incorporating a 'right to challenge' in a structured way, possibly facilitated by a website and defining criteria to ensure fairness.

8 Conclusions

There is widespread interest in developing a revised and inclusive Code, in particular if its implementation were to be supported and monitored. The strong support for the Development Education Forum's initiative in renewing the debate and to update the Code exists not least because it would facilitate engagement between the stakeholders and this would be widely welcomed.

While there is low awareness of the actual Code, there is generally high awareness of and interest in the issues it aims to address. Arguably it is desirable that the principles the Code seeks to promote are embedded in people's consciousness and appear to impact on practice, rather than remaining merely the content of a document that is not referred to. This awareness presents a strong foundation on which to build and can be further enhanced by stimulating a thoughtful debate on the subject that takes the changing context into account.

The diverse perspectives that stakeholders (fundraisers, development educators, advocates and communicators) hold lies at the heart of ongoing debates within and about NGOs, and can be seen as reflective of the key challenge of achieving coherence within NGOs. Opportunities to discuss and establish dialogue across functions around these issues are not common. Herein lies an opportunity and a responsibility for Dóchas (and other national platforms) to facilitate and ensure a meaningful debate occurs.

The huge variances between stakeholders remain significant and the characterisation of what is 'acceptable or unacceptable' and what is 'right or wrong' in this regard is largely subjective. The crux lies at policy levels within NGOs where strategic decisions are taken. Dialogue within and between organisations can help create a shared understanding of the challenges and increased commitment to the principles of the Code. Clarification on what signing up to the Code actually means for an NGO is vital in this regard.

The role of the media, while not directly within the scope of this Code which addresses NGO practice, deserves more attention. Most of the public across

Europe draw their knowledge of development and humanitarian issues from media and not NGO sources. Moreover, an NGO can be compliant with the standards of the Code in their own direct communications, while at the same time facilitating journalists to communicate images and messages that are wholly contradictory to the Code to reach far wider audiences. When the process of NGOs updating and debating the Code has been further progressed it can lead to an opportunity for engagement with the media to discuss the contradictory challenges posed here.

The Information Working Group of the Development Education Forum, having valuably re-focused attention to this debate, can continue to play a critical role in ensuring that the debate gathers momentum at the European level, possibly through proposing the formation of a time bound and focused Working Group within CONCORD which would oversee the creation of a revised and inclusive Code.

This subject goes to the heart of the maximising the impact of NGO work and improving its quality. It is appropriate therefore that Dóchas plays a role in leading and facilitating national level debate on these issues, and in doing so provides the basis for bringing organisations together to discuss the real challenges that updating and applying the Code represents.

9 Recommendations

Recommendation 1 – Updating the Code

1. A representative team (Task Group) should be assembled to either:
 - a. Edit the existing Code, or
 - b. Create a new set of Guiding Principles with a supporting document giving guidance to practitioners as to how they could practically achieve the principles (See Appendix D for an example of Amnesty International’s Draft Guidelines)

The Task Group could be a working group of CONCORD with the specific and time bound remit of engaging with stakeholders and creating an updated Code.

2. The revised draft should be circulated through the same channels to garner feedback, and should be finally agreed by the Development Education Forum and signed off by the CONCORD General Assembly. It should be monitored thereafter through the Forum and national platforms by conducting a review every 3 - 5 years.
3. In conjunction, Dóchas and, where possible, other national platforms should consider conducting workshops on the revised Code, targeting participation by all the stakeholder groups and aimed at stimulating debate within and between organisations.
4. NGOs should then be asked to re-state their commitment to the revised Code.

It is vital that, while the Development Education Forum is leading the process, ownership of this project is widened beyond development education practitioners. Therefore the Task Group needs to ensure that all stakeholders (development educators, fundraising staff, communications staff, policy setters, advocacy, CEOs/Directors) are included. In addition, Task Group members must be representative of a range of EU states. Meanwhile NGOs should ensure that perspectives their partners and southern perspectives are incorporated at all stages.

Recommendation 2 – Monitoring and Evaluating the Code

It is widely agreed that to become engaged in a revision of this Code a clear commitment to supporting its implementation through training, monitoring and evaluation is essential.

1. An implementation framework should be devised to accompany a revised Code. It should include:
 - a. Clarification on what ‘signing on’ to the Code would mean in practice for NGOs
 - b. An outline implementation plan
 - c. A template for self-audit (see Appendix C).

See Appendix E for more detail on the possible content of each of these steps.

2. Initially the focus needs to be on a 3 - 5 year timeframe of internalisation within each signatory NGO. After that time and based on review, choices can be made about moving to external recognition and compliance monitoring.
3. Whether monitoring should remain within NGOs own responsibility or is passed to an independent body needs to be considered. Establishing an independent monitoring body would have obvious resource implications. It could also impact on the independence of NGOs.
4. Consideration should be given to establishing a ‘kite mark’ in the form of a statement which organisations could place on their communications material as evidence of their commitment to high standards (see Appendix E).
5. It is suggested that CONCORD could facilitate awareness raising and training for the Code at European level, and, ensure through TRIALOG EU-wide engagement. This approach could be replicated at national and local levels by national platforms and their member organisations.

Recommendation 3 – Development of a Standard of Recommended Practice

The agreement of a Standard of Recommended Practice is closely aligned with developing the more detailed workings of the previous recommendation. For example, establishing the steps necessary to award a kitemark or to conduct a self audit would determine the basis for part of a standard of recommended practice.

1. A Standard of Recommended Practice should be drawn up, with the aim of assisting practitioners in implementing and institutionalising the Code and ensuring its ongoing relevance.
2. The People in Aid 'Implementing the Code' can be a resource. Steps of a self audit tool are also presented in Appendix C, and the NGDO Charter also provides a practical interpretation of the steps involved in implementing a Code.

Recommendation 4 – Enabling processes

1. It is apt that Dóchas play a role in facilitating a national level debate on this subject, perhaps by organising a seminar on the subject. This experience can feed into the European context through the Development Education Forum and CONCORD structures.
2. The Information Working Group of the Development Education Forum should continue to play a critical role by ensuring that the debate gathers momentum at the European level, perhaps through recommending the formation of a time bound and focused Working Group within CONCORD which would oversee the creation of a revised and inclusive Code.
3. Advancement of an NGO-lead debate resulting in an updated Code could in turn lead to an opportunity for direct engagement with the media on the challenges outlined earlier. Organisations that regulate (BCI, Ofcom) or aim to influence (IBT, CONNECT) media portrayal of the developing world are related stakeholders and can significantly influence the wider operating environment through which media messages and images are channelled. Such engagement might be in the form of targeted research, or information exchange through seminars, workshops or networking events.

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Appendix A - The survey questionnaire

1. Were you aware of the Code before this discussion?
2. How relevant is the Code to you in your work? Does the Code inform the decisions/ practical choices you make in your role?
3. Does the Code inform your organisation's communications policies?
4. Is your total organisation coherent in its approach to images and messages?
5. (Are different criteria used in different parts of the organisation – i.e. Communications, Fundraising, Development Education?)
 - a. What are the challenges represented by this?
 - b. How might it be overcome?
6. Are the issues the Code covers relevant?
7. Are there other issues that it doesn't cover that it should?
8. Does your organisation fulfil the spirit of the Code
 - a. Does your organisation go further? How?
 - b. Not as far?
 - c. Why?
9. Does your part of your organisation fulfil the spirit of the Code
 - a. Does your organisation go further? How?
 - b. Not as far?
 - c. Why?
10. What values and pressures inform the decisions you make about using images and messages?
11. Would a revised Code of Conduct be useful to you? How and Why?
12. What does a revised Code need to include to make this a reality?
13. How could or should the Code be monitored and evaluated?
 - a. Would peer review work?
 - b. A quality mark?
 - c. Made compulsory for registration/receipt of co-funding
 - d. What role can social auditing play?
 - e. Other
14. Have you experience of other successful and usefully implemented Codes?
15. Please tell us about them
16. What are your thoughts on setting up a Development Education Standard of Recommended Practice?

About You

Do you work for an NGO/Media/Funder/National Platform/Other (please specify)?
What is your role?

Please let us have any other comments or thoughts.

Appendix B - The Work Plan

Work Plan	Date
Meet with members of Dóchas Coordinating Team, agree detailed Terms of Reference	1 June
<p>Set up and conduct meetings with relevant stakeholders (either face to face or telephone), including:</p> <ul style="list-style-type: none"> ▪ Coordinating Team members ▪ Dóchas Development Education Group ▪ Media (TV, also print and web) ▪ Fundraising Managers of development agencies ▪ Communications Managers of development agencies ▪ Senior managers/CEOs of development agencies ▪ Members of European national platforms (by phone) ▪ Development Education Exchange in Europe Project (by phone) ▪ Funders <p>Conduct desk research of relevant papers</p> <p>Possibly include meeting/calls with Coordinating Team</p>	2 – 14 June
Submission of First Draft to nominated member(s) of Coordinating Team	17 June
Feedback on First Draft	20 June
Submission of Second Draft to full Coordinating Team	23 June
Feedback on Second Draft	27 June
Revision and preparation of Final Draft	27 June – 29 June
Submission and sign off of Final Draft	30 June

Appendix C – A Self Audit Tool

The following is an extract from 'A Common Approach to Child Protection for International NGOs'
(www.peopleinaid.org/download/Setting%20The%20Standards.pdf).

Self-audit tool

The following is a simple self-audit tool to assist you in forming a picture of what level or standard your organisation (head office, international office) is currently operating at in relation to safeguarding children and in identifying gaps. The Checkpoints idea is based on the work of George Varnava with the Forum on Children and Violence. The NSPCC has, with permission, developed the material for use as an audit tool for child protection and the version presented here has been adapted for INGOs.

Using Checkpoints

The Checkpoints below extract key criteria that can be seen to represent a set of baseline minimum standards that all international agencies committed to protecting children should strive to meet. However, depending upon the nature of your organisation's work with children and the context, environment and conditions in which you work, some of the checkpoints may seem more relevant than others. This self-audit tool is intended to be a useful guide and you may wish to delete or add criteria to ensure relevance to your particular activity (the 'self-audit web' allows for additional criteria).

Before you start, take a copy of the templates, date the copy and then follow the steps outlined below. You can then keep a record in order to review your progress at a later date. The Checkpoints each comprise a number of criteria relating to different aspects of an organisation's provision of services or activities and arrangements for ensuring children are safeguarded within these. They relate to:

- 1. Philosophy and principles**
- 2. Policies and procedures**
- 3. Good practice and prevention**
- 4. Implementation and training**
- 5. Information and communication**
- 6. Monitoring and review**

For each statement in Checkpoints 1-6, tick one of the boxes A (in place), or B (partially done) or C (not in place). Transfer the results to the 'self-audit web' (see below) to create a visual record of compliance with these standards that can then be used to help you draw up an action plan and subsequently review progress. Once you have completed the web you can begin to address those areas that are not in place. Refer back to the Standards to check out where the gaps are and ascertain in more detail what is needed.

1. Philosophy and Principles

1. Organisational mission and/or other statements of purpose and direction reflect concern for the protection of children
2. A culture of safety exists that ensures the welfare of children is paramount and policies and procedures demonstrate a commitment to protecting children from abuse
3. The UN Convention of the Rights of the Child (UNCRC) is clearly identified as the basis for child protection
4. Managers and senior staff promote a culture that ensures children are listened to and respected as individuals
5. The child protection policy makes it clear that all children have equal rights to protection
6. All disciplinary measures/sanctions are non violent and do not humiliate children

2. Policies and Procedures

1. There is a code of conduct
2. The organisation provides guidance on appropriate/expected standards of behaviour of adults towards children
3. The consequences of breaching the code are clear and linked to organisational disciplinary procedures

4. There are policies and procedures for recruiting representatives who have contact with children and for assessing their suitability to work with children
5. Where there is direct responsibility for running/providing activities, including residential care, safeguarding measures are established to ensure children are adequately supervised and protected at all times
6. There are well-publicised ways in which representatives can raise concerns, confidentially if necessary, about unacceptable behaviour by representatives

3. Good practice and Prevention

1. The organisation has a child protection policy
2. The policy is approved and endorsed by the relevant management body (e.g. Senior Management Board, Executive Committee).
3. The policy is mandatory for all representatives
4. There are clear and unambiguous procedures in place in respect of child protection, which provide step by step guidance on what action to take if there are concerns about a child's safety or welfare
5. There is a designated person/s with clearly defined role and responsibilities in relation to child protection, which are appropriate to the level at which he/she operates
6. The child protection procedures are consistent with international standards and good practice in the protection of children. They should also take account of issues that arise as a result of different country contexts

4. Implementation and Training

1. There is clear guidance to staff, partners and other organisations (including funding organisations) on how the child protection policy will be adapted and applied practically in different circumstances
2. The policy must be applied in ways that are culturally sensitive but without condoning acts of maltreatment that are universally described as abusive
3. There is a written plan showing what steps will be taken to safeguard children, who is responsible for what actions and when these will be completed
4. There is an induction process for all representatives which includes familiarisation with the child protection policy and procedures
5. All representatives are provided with opportunities to learn about how to recognise and respond to concerns about child abuse
6. This document provides minimum standards for an agency's work with and through partners

5. Information and Communication

1. Children are made aware of their right to be safe from abuse
2. Everyone in the organisation knows who is the designated person for child protection and how to contact them
3. Contact details are readily available for local child protection services, such as social services department, police and emergency medical help
4. Children are provided with information on where to go to for help and advice in relation to harassment and bullying
5. Contacts are established at a national and/or local level with the relevant child protection/welfare agencies as appropriate
6. Designated child protection staff have access to specialist advice, support and information

6. Monitoring and Review

1. Arrangements are in place to monitor compliance with child protection policies and procedures and with recruitment and selection policies and procedures
2. Steps are taken to seek the views of beneficiaries on policies and procedures and how they are working
3. Formal mechanisms exist to identify and apply experience of operating child protection procedures
4. All incidents, allegations of abuse and complaints are recorded and monitored
5. Policies and practices are reviewed at stated intervals, ideally at least every 3 years

- Processes/mechanisms are in place to consult children and parents as part of the review of safeguarding policies and practice

The self-audit web

Once the key criteria above have been read and ticked as either: **in place, partially done** or **not in place**, transfer the results to the web using the shading key below.

The web illustrates visually the stage reached by the organisation in safeguarding children and highlights where further action needs to be taken.

Please note that there is no intended hierarchical progression from 1 – 6, the aim of this exercise is to reveal any gaps.

Appendix D – Amnesty International Draft Guidelines

Draft General Principles on use of photographs in Amnesty International Materials

We strive to uphold certain standards in our use of pictures of individuals, groups and practices in AI documents, reports, websites, campaign and action materials. These can be summarised as follows:

- 1.1 The overall balance of photographic content (in any AI report, document, website, etc.) should portray human dignity and positive action in the face of human rights violations.
- 1.2 The reality of the effects of human rights violations should be depicted where it is appropriate (eg; to the aims of the particular Campaign / Action) and does not infringe the rights or dignity of the subjects. There should be no photos included purely to shock or disturb.
- 1.3 The security and rights of individuals portrayed in photographs will be a major consideration.
- 1.4 Every effort will be made to ensure that photographs of individuals are not published without their knowledge and consent.
- 1.5 Every effort will be made to ensure that individuals in photographs are identified, or not, according to their expressed wishes.

Appendix E

Template for an Implementation Plan

(a) The following components are suggested in a template implementation plan:

- NGOs signed up to the Code should be asked to commit to the Code within their public policy communications, for example on website, annual report and other public communications.
- This could include placing the equivalent of a kite mark in the form of a statement on their communications materials such as 'X organisation is committed to fair and true communications in all our work'. The experience of People in Aid is relevant in this regard; they have a 2-stage kite mark process which is externally audited (see section 6 of this report, and www.peopleinaid.org).
- Where possible NGOs should commit to agree their own Code through an internal process that engages all stakeholders.
- The Code, whether general or an organisation's own, should be supported by an internal communications and training strategy.
- Adherence should be monitored as part of the organisations' social audit. Where this is not possible a self-audit tool should be available to assist organisations review themselves.
- For organisations who don't have an internal audit process or an evaluation and monitoring function, a board member or board sub-committee could be responsible for monitoring and evaluation standards and compliance
- A suggested timeframe should be included for all these processes.

(b) A template for a self-auditing tool is included in 'Setting the Standard, a common approach to Child Protection' for international NGOs, and is designed so that it can be applied by each organisation to establish their own level of standards (see extract in Appendix C). The self-audit is achieved by using a series of checkpoints, which can be adapted by each organisation to ensure relevance. A similar tool could be adapted for this Code.

(c) A paragraph on a 'signing on' statement for NGOs might include the following:

- Our responsibilities as a signatory NGO is to
- We are accountable for our communications as follows....
- We will state this commitment in our public policy statements
- We commit to conduct a self-audit every year
- We will include reference to the Code in our employment contracts, and in our induction and training programmes
- We will make a public feedback mechanism available
- We will include the Code in our contracts with all relevant suppliers (i.e. advertising agencies, communications consultants, marketing specialists)

(d) When NGOS and their national platforms have engaged with the issues, dialogue should be established with media and with organisations that (a) regulate or (b) influence the media, on these issues. This can be in the form of discussion seminars and/or based on academic research.

The wider environment in which NGOS operate is subject to both legislation and market forces which may override many of these debates. Coming from a position where it has brought these debates up-to-date itself, it will be better placed to engage with and hopefully influence other sectors.

Appendix F – Participants

Responses to the survey questionnaire were received from:

Actionaid Ireland
Amnesty International - Irish Section
Association of Finnish journalists focusing on development (Maailman sivu)
Comhlámh (Irish organisation for returned development workers)
CAFOD UK
CENSU, Malta
Centre for Global Education, Northern Ireland
Concern Worldwide
DEA, UK
Finnish One World Network
Finnish Psychologists for Social Responsibility
Finnish Foundation for Media, Communication and Development
Irish League of Credit Unions
Kare4Kenya
KEPA - Service Centre for Development Cooperation (Finland)
National Youth Council of Ireland
Oxfam GB
Pacific Islands Friendship Society (Finland)
People in Need (Czech Republic)
Plan International
Barbara Raftery
Save the Children Italy
Save the Children UK
Skillshare International
Union of Journalists in Finland

Further discussions were held with:

Nancy Aburi Robbins
Vince Caruana, KOPIN (Malta)
Stephanie Casey, Oxfam Ireland
David Clark, Photojournalist and University of Bolton academic (www.djclark.com)
Rory Coveney, Communications Unit, Development Cooperation Ireland
Peter Davis, Oxfam GB
Michael Doorly, Development Education Department, Concern Worldwide
Carmel Dunne, Secretary General, Irish Red Cross
Monica Gorman, Self Help Development International
James Howe, Fundraising Department, Concern Worldwide
Yvonne Klynman, International Federation of Red Cross Red Crescent
Thora Mackey, Deputy Director, UNICEF Ireland
Kate Manzo, University of Newcastle
Alex Mathieson, CAA (Oxfam Australia)
Máire Matthews, Education specialist, Development Cooperation Ireland
Linda McClelland, Chief Executive, War on Want (Northern Ireland)
Ida McDonnell, OECD
Declan McLoughlin, Licensing and Complaints Officer, Broadcasting Commission of Ireland

Lizzy Noone, Development Education Department, Concern Worldwide
Ciara O'Brien, Development Cooperation Ireland
Sam O'Sullivan, Oxfam International
Johnny Sheehan, National Youth Council of Ireland
Olive Towey, External Affairs Department, Concern Worldwide
Nikki van der Gaag
Barbara Wilson, Development Cooperation Ireland – Development Education Unit

Participants in Open Meeting on 21st June 2005

Caroline Maxwell, Actionaid Ireland
Lizzy Noone, Development Education Department, Concern Worldwide
Barbara Raftery, Dochas Development Education Group
Danny Rowan, Communications Department, Concern Worldwide
Siobhán McGee, Consultant

Open Space session at DEEEP Summer School, Sweden, 10th June 2005

Johnny Sheehan, National Youth Council of Ireland (facilitator)
A number of Summer School attendees