



External Communications Policy

Document number: PO2024-064

Version 1

Approval

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|---------------|---|-------------|------------|
| Policy owner | Executive Director, Strategy and Engagement | | |
| Approved by | Executive Leadership Team State Council | | |
| Date approved | ELT: 14/11/2024 State Council: 29/11/2024 | Review date | 29/11/2025 |

Purpose

1. The External Communications Policy (the Policy) provides guidance and approval processes for the release of any St Vincent de Paul NSW (the Society) branded communication or communication that may be attributed to the Society.
2. The Policy establishes the procedures and protocols for:
 - Media enquiries and responses
 - Social Media dissemination and
 - Engagement with external stakeholders including funders and government
3. The Policy ensures that all external communication complies with relevant legislative and regulatory requirements and internal processes protect the confidentiality and integrity of the Society's and the People We Assist's information.
4. The Policy establishes the necessary guidelines to ensure:
 - the Society's communications respect the dignity of the People We Assist
 - the accuracy and reliability of any information published by the Society
 - the Society is speaking with one voice in its commitment to social justice
 - that the Society's Mission and reputation are protected.

Scope

5. This Policy applies to:
 - all Society Personnel including members, volunteers, employees, consultants and sub-contractors
 - all formal and informal branded communication intended for an external audience or that has a reasonable chance of ending up in the public domain, including but not limited to: media stories, Society publications, advertisements, newsletters, videos, reports, submissions to government or regulatory bodies, speeches or presentations
 - all social media that is branded communication or that can be seen as being in connection with the Society.

Related policies and procedures

6. Related policies and procedures include:
 - Code of Conduct
 - Safeguarding Children and Young People Policy
 - Safeguarding Vulnerable Adults Policy
 - Acceptable Use of Technology
 - Information and Data Governance Framework

- Conflict of Interest Policy
- Managing Fraud and Dishonest Behaviour Policy
- Incident Management Policy
- Data Breach Response Plan
- Respectful Workplace Policy
- Privacy Policy
- Privacy Management Policy

Policy principles

7. Those who speak publicly on behalf of the Society must endeavour to ensure that criticisms are directed at the issues, and not at particular political parties or individuals.
8. The Rule, Part 1, p.19, 1(4) says:

“...The Society is concerned with not only relieving need but with redressing situations that cause it...” To that end, the Society is committed to working to change the conditions that cause suffering in our society...”
9. The Society is committed to effective, accessible, consistent and transparent dissemination and receipt of information and communications within the organisation and with People We Assist, stakeholders, including funders and government, and the media and social media.
10. The Society recognises that some information may be sensitive in nature and holds information in accordance with the Privacy Act 1988 and the NSW Privacy and Personal Information Protection Act 1998.
11. The Society:
 - is committed to speaking out against structures where injustice, inequality, poverty or exclusion are due to inadequate and/or unjust economic, political, legislative, public policy or social structures
 - strives to work with the wider community to prevent all forms of abuse against children, young people and vulnerable adults and to ensure that the inherent dignity, care and wellbeing of all vulnerable people is upheld
 - interacts with all levels of government, and other partners and donors, in carrying out its work and activities on behalf of the people we assist and as such, the Society acknowledges that there may be a potential conflict in accepting some funding and challenging public policy
 - acknowledges the importance of continued dialogue with government, the influence of media and social media in promoting social justice goals and drawing the attention of the public and policy makers to those areas where the Society sees a need for action for Social Justice
 - uses a range of available communication channels to inform and inspire the public about its mission and work

- is committed to inclusive design to ensure that all users, regardless of their background or abilities, can participate fully and engage on social media
- Is committed to working with all relevant Society Personnel, including members and volunteers, on the effective implementation of this policy and its procedures
- understands that effective public comment and the protection of the Society’s brand value, is enhanced by consistent, organisation-wide dissemination of information
- acknowledges the inherent risks in the use of media and social media platforms. Therefore, any external, public engagement should be exercised in accordance with this policy and its related guidelines

Roles and responsibilities

12. The Society is an advocate for the rights of the poor and marginalised, and it has a missional calling to challenge policies that are oppressive or unjust. Public comment on behalf of the Society on matters relating to government policy is the prerogative of State Council through the State President, the Board Chair, or the CEO. Engagement with government, when acting on behalf of the Society or in any capacity as a member of staff or members/volunteer of the society needs to be aligned with the Society’s (NSW) official position.
13. All Society personnel, including members, volunteers, and contractors are responsible for complying with this policy. Specific key responsibility owners and contact points are set out in Appendices 1, 2 and 3.
14. Only those authorised to do so can speak to government and/or the media and/or make social media comment, on behalf of the Society, on issues of a political and/or religious nature or share any personal information about people we assist (with their consent).

Review

This policy is due for review one year from its date of endorsement and every three years thereafter or more frequently as needed to align with legislative or practice changes.

Further assistance

All Society personnel, including members, volunteers and contractors should seek assistance from their line managers, supervisors, Presidents or Regional Directors, for advice on the implementation of this policy. Specific key responsibility owners and contact points are set out in Appendices 1,2 and

Approval and amendment history

| Version | Approval authority | Date | Amendment summary |
|-------------------------|----------------------|--------------------------|--|
| Doc # PO2024- 064 | ELT State Council | 14/11/2024 29/11/2024 | This is a new policy which merges, Engagement with Government, Social Media and Media. |
| Doc # | | | |

Appendix 1: Roles and responsibilities – Government Engagement

1. **The Rule 7th edition 2012**, makes it clear that the '*Society does not identify with any political party*' (Part 1: 7.8) and therefore any dealings with government, by Society Personnel, in their capacity as Society Personnel, must take this into account.
2. The Government Relations and Policy team:
 - is responsible for coordinating and supporting the Society NSW's engagement with elected officials. This includes both unsolicited approaches by government politicians and officials and situations where Society NSW personnel have made a direct approach to any politician or official,
 - should be kept informed of engagement with Senior Public Service representatives to determine if any additional representation or support is required and to ensure consistency of messaging when dealing with stakeholders.
3. While Society Personnel are encouraged to speak up on issues that impact the People We Assist, all interactions with government on behalf of the Society must align with the official position of the Society relating to that issue. For example, interactions around Domestic and Family Violence should align with the official public policy position of the Society on that matter. The Government Relations and Policy team (through the relevant Executive Director, Director or Regional Director or directly) can provide Society Personnel with the official position, or key talking points, of the Society on key issues.
4. Society Personnel can meet with government on matters not aligned with the official position of the Society NSW in their personal capacity, provided that:
 - it is clear that they are not representing the Society and,
 - they have identified themselves as Society Personnel, but their views are not held by or representative of the Society.
5. All interactions with Government on behalf of the Society (excluding those captured below in point 6) - including Ministers, Assistant Ministers, Parliamentary Secretaries, MPs, local government or their advisors and with senior public servants such as Chief Executive Officers, Secretaries or Director Generals and Directors must be disclosed **prior to the meeting**, to the Government Relations and Policy team at social.justice@vinnies.org.au directly or via the relevant Executive Director, Director or Regional Director to determine whether any additional representation, advice or support from the Society is required. This is also the case for ongoing and regular interactions with elected officials in government.
6. Members and staff may have longstanding and regular engagement with numerous government departments in which operational issues, contract management and grant applications are discussed. In these circumstances, the Government Relations and Policy team should be kept informed for consistency of messaging across the Society and can be further engaged if specific assistance or advice is required.

7. If a Member, volunteer or employee is approached by a Parliamentary Committee or Inquiry for comment or participation (on matters relating to the Society), they should notify the Government Relations and Policy team at social.justice@vinnies.org.au to determine whether additional representation or support by the Society is required.
8. Members and volunteers must inform the Government Relations and Policy team prior to proactively contacting a Parliamentary Committee or inquiry on behalf of the Society.
9. Examples of types of engagements include:

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| Interaction with government | <ul style="list-style-type: none"> • Advocating for a policy position in a face-to-face meeting, formal submission or correspondence • Responding to requests for information • Responding to requests to appear and/or provide information to parliamentary committees and inquiries • Seeking funding for programs • Proactive briefings on the Society and its operations • Proactive briefings or correspondence highlighting concerns or operational issues for the society • Attendance at various networking and community events with government presence/interaction Inviting politicians and government officials to events and tour programs |
| Private capacity | Interactions with Government which are not done in the capacity as a Member, Volunteer or employee of the Society but in the capacity as an elector or resident of NSW and Australia. |

Further assistance

10. The following individuals can provide advice about the implementation of this policy.

| Name | Title | Contact Details |
|------------------|---|--|
| Veronica Newman | Director, Government Relations and Policy | social.justice@vinnies.org.au |
| Jonathan Edwards | Manager, Policy and Advocacy | social.justice@vinnies.org.au |
| Satya Tanwer | Executive Director, Strategy & Engagement | Satya.Tanwer@vinnies.org.au |
| Yolanda Saiz | CEO | 0499 980 313 Yolanda.Saiz@vinnies.org.au |

Appendix 2: Roles and responsibilities - Media

1. Designated spokespersons for media requests are outlined below (see Designated spokespersons)
2. In general, the designated spokesperson in each situation holds authority for approving the response to a media request. The designated spokesperson does not necessarily have to deal with every request personally but may delegate the preparation of a response (e.g. to Manager, Communications).
3. The Manager, Communications and/or the Communications Coordinators and/or the Director, Marketing and Communication, are responsible for responding to State-level media requests. This involves briefing the relevant spokesperson about the nature of the request, the context, and the appropriate key messages before they speak to the media.
4. Determining who should speak to the media on contentious and less straightforward issues is the responsibility of the Manager, Communications in consultation with the Director, Communications and Marketing and, as relevant:
 - Chief Executive Officer;
 - State President;
 - Vice Presidents (on relevant portfolios)
 - Central Council Presidents;
 - Executive Directors;
 - Regional Directors; and/or
 - appropriate Service Manager(s).
5. The determination will be made after considering the:
 - nature of the media request,
 - context of the request, and
 - any sensitivities or risks associated with the request.

Designated Spokespeople

6. The following are the designated spokespeople depending on the type of matter:

| Matter | Spokesperson |
|---|---|
| National or state-wide importance and/or Issue with significant public relations or where the | State President, Board Chair, CEO or duly appointed representative (for example, relevant Vice President). (Refer to the Manager, Communications or the Director, Communications and Marketing in the first instance.) |

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| Society chooses to defend itself against public criticism | |
| Non-contentious issues within the Central Council. | Central Council President or Regional Director. Note, if comment is sought over activities of local government, this should be referred to the Manager, Communications. |
| Local or Parish Matters | Conference President. |
| Matters relating to Vinnies Services | CEO, the Executive Director, Vinnies Services Director or the relevant Service Manager, depending on the nature of the media request. |
| Matters relating to Vinnies Shops – statewide issues | Executive Director, Commercial Enterprise, Retail, and Fundraising or Director, Retail and Logistics |
| Matters relating to Vinnies Shops – local issues | The Executive Director, Commercial Enterprise, Retail, and Fundraising, Director, Retail and Logistics or Regional Manager should speak on issues relating to individual Vinnies Shops. In certain cases when appointed by the Regional Manager, the Area Manager can act as spokesperson. |

When to Escalate

7. Media contact involving any or all of the points below should be directed through the Manager, Communications and/or the Director, Communications and Marketing.
 - National or state-wide issues e.g. advocacy themes such as natural disasters, housing affordability, the cost of living, refugees and people seeking asylum;
 - An issue that could potentially impact the Society’s reputation;
 - An issue with state-wide impact or relevance;
 - An issue where the Society has to defend itself against public criticism.
8. In the event of a major issue or developing crisis that is likely to attract adverse media attention, please also contact the Director, Communications and Marketing and the Manager, Communications as soon as possible.
9. Central Council Presidents, Executive Directors, Regional Directors or Vinnies Services’ Directors may be the first points of call for everyday local promotional activity and media engagement such as
 - Opening new shops and facilities
 - Community fundraising events
 - Routine questions on the local activities of the Society.

In the interests of consistency, the Media Team should be advised about these promotional and media engagements.

10. Only those authorised by the Manager, Communications and/or the Director, Communications and Marketing, can speak to the media on issues of a political nature.
11. Employees can access relevant contact details and communications and media resources here: <https://vinns.w.sharepoint.com/sites/staffportal-nsw-How-Do-I/SitePages/Communications-and-Media.aspx?web=1>
12. [Members and Volunteers can access relevant contact details and communications and media resources here: https://mavs.vinnies.org.au/](https://mavs.vinnies.org.au/)

People we assist and the media

13. Media requests often come with little or no notice, and the demand is often to interview and / or photograph people we assist. The Society recognises its responsibility to balance the protection of people we assist from the risks associated with engaging with the media with the need to empower and promote their voices through the media to tell their stories.
14. The best interests and integrity of the people we assist are paramount and therefore the Communications and Marketing teams work with Members, Volunteers and Early Intervention (MVEI), Vinnies' Services, and the Policy and Advocacy Team to ensure the Society's Story Telling Charter is adhered to and implemented before any interviews take place.
15. All interviews with People We Assist are vetted by the Manager, Communications and/or the Communications Coordinators and approved by the Director, Communications and Marketing after having undertaken the checks and balances provided by the Society.
16. The Society's Story Telling Charter and related resources can be found at Appendix 4.

Informed consent protocols for the people we assist

17. Following a request from the media to interview someone on a particular issue, the Communications Manager should be contacted immediately. They will then liaise with the relevant Central Council President, Regional Director and/or Vinnies Services' Director.
18. If agreed to, the above will identify a suitable person personally known to them and ask them whether they would be willing to speak to the media.
19. If they agree, the Communications Manager and/or their Service Manager will meet or speak to them to brief them fully about the implications of a media interview. This briefing will include informing them of the risks (including privacy and family concerns).
20. The Communications Manager and Service Manager will assess whether the interview should proceed. At all times, they will draw on their expertise to assess whether it is in the Society's, and the individual person's, best interests to participate in a particular media interview.
21. The person being interviewed may choose to withdraw their consent at any time prior to an interview taking place.

22. The People We Assist's nominated support person will be available to debrief and check in during and after media interviews and where necessary, the Communications Manager and/or Service Manager will also be present.
23. Advice from the Safeguarding Manager must be sought regarding any media requests involving children and young people (always) or vulnerable adults (where deemed necessary).

Government relations

24. The Manager, Communications and the Director, Government Relations and Policy must be notified where a Member of Parliament is invited to a public event as there are protocols that need to be adhered to.

Managing incidents and crises

25. It is possible that the Society, by the nature of its work, could be affected by a crisis that will attract extensive media attention. The Society must be able to respond quickly and calmly in such situations.
26. In the event of a suspected or actual data breach, refer in the first instance to the Data Breach Response Plan
27. In the event of a business disruption, refer to the Business Continuity Plan
28. Other than a suspected or actual data breach, or business disruption event, for incidents resulting in adverse media or reputation damage, a Crisis Communications Committee may be formed consisting of:
 - The Chief Executive Officer (primary spokesperson);
 - The State Council President;
 - The Executive Director, Strategy and Engagement;
 - The Director, Communications and Marketing;
 - The Communications Manager and/or Communications Coordinator;
 - Any appropriate Central Council President(s) and /or Regional Director(s);
 - Any appropriate Service Manager(s)
 - Any other person deemed appropriate based on the nature of the incident.
29. Where required, the Director, Legal should be consulted prior to issuing media releases or media statements concerning incidents.
30. Only the committee may speak to the media on the issue once an adverse incident or crisis has been recognised.
31. The committee will have pre-determined holding messages and key messages available to adapt for quick responses.

Internal stakeholder considerations

32. Negative media coverage of the Society can impact the reputation of the organisation with members, volunteers and employees. Similarly, positive coverage can enhance the pride and engagement of internal stakeholders. As such, all media opportunities should consider possible impacts and alert the Manager, Internal Communications as soon as practically possible to ensure internal communications activities coincide. Internal stakeholders should ideally be informed of possible impacts ahead of any media exposure.

Definitions

33. Some important definitions can be found here:

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| Media | Media are the communication outlets or tools used to store and deliver information or data. The term refers to components of the mass media communications industry, such as print media, publishing, the news media, photography, cinema, broadcasting, and advertising, this includes radio, television, newspapers, magazines and the internet. |
| Vulnerable Adult | <p>Vulnerable Adult refers to “an individual aged 18 years and above who is or may be unable to take care of themselves or is unable to protect themselves against harm or exploitation by reason of age, illness, trauma or disability, or any other reason”.</p> <p>Vulnerable adults at higher risk include:</p> <p>a) A person with a disability or mental health condition</p> <p>b) A person over 65 years or older or living in a residential aged care service.</p> |

Further assistance

34. The following individuals can provide advice about the implementation of this policy.

| Name | Title | Contact Details |
|---------------------|---|--|
| Media Team | | media.nsw@vinnies.org.au |
| Kate Pascoe | Manager, Communications | Media enquiries 0417 446 430 0404 700 379 Kate.pascoe@vinnies.org.au |
| Rob Crosby | Communications Coordinator | 0429 483 796 Robert.Crosby@vinnies.org.au |
| Tom Morgan | Director Communications and Marketing | Thomas.Morgan@vinnies.org.au |
| Belinda-Jayne Davis | Safeguarding Manager | Belinda-jayne.davis@vinnies.org.au |
| Satya Tanwer | Executive Director, Strategy & Engagement | Satya.Tanwer@vinnies.org.au |

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| Yolanda Saiz | CEO | 0499 980 313 Yolanda.Saiz@vinnies.org.au |
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Appendix 3: Roles and responsibilities – Social Media

Official platforms and account management

1. The Marketing and Communications teams manage official online communities and social media platforms.
2. All services and Central Councils are encouraged to actively engage with the main official Society platforms, pages and sites via a Marketing Request form which can be found at: <https://vinns.w.sharepoint.com/sites/staffportal-nsw-How-Do-I/SitePages/Marketing.aspx>
3. All posts to the Society’s official State-level platforms require approval from the Marketing and/or Communications team who can be contacted at: NSW.MarketingandCommunications@vinnies.org.au
4. Individual councils, conferences, services, shops or employees, or individual members or volunteers, must not create their own Society social media presence (other than as indicated below) without specific authorisation from the Marketing and/or Communications team. Such an unauthorised presence can expose the Society to unacceptable risk in the public eye.
5. Each Central Council can establish one official Facebook profile for their Central Council area, in collaboration with the Marketing and/or Communications team. The establishment of such pages must be agreed by both parties and approved by Director, Communications and Marketing.
6. Only authorised social media accounts can use the Society logo and name.
7. VinniesNSW Marketing must be granted access to all Society social media pages. It is the responsibility of the Central Council/relevant owners to grant access to @VinniesNSW, via Meta Business Account. VinniesNSW should be set up as “Admin” or “Super Admin”. Outside of Meta, direct access to the page must be granted to the Marketing team.
8. Any paid activity, (ie, boosting, sponsored posts, ad campaigns) to any of the Society’s social media accounts must be authorised by the Marketing and/or Communications team. No individual pages can ‘boost post’ without prior approval.
9. As of June 2024, any pre-existing Society social media accounts that have not received previous approval, held by individual services or sub-units, are to be closed, or managers need to apply for specific authorisation from the Director of Communications and Marketing.
10. Annually, the Marketing team will audit all Vinnies NSW associated social profiles. Profiles that have been inactive for over 6 months or that are consistently not adhering to Vinnies branding guidelines will be deactivated.

Posting on Social Media

11. Social Media is a potentially useful and powerful tool for advocating on behalf of the People We Assist. It can also, however, pose risks to the Society's reputation and ultimately the impact of the work it seeks to deliver. Additionally, there are laws that apply to Social Media posts and those laws can extend not only to Society Personnel posting on behalf of the Society, but also to Society Personnel posting in a personal capacity.
12. While authorised administrators and editors on authorised Vinnies social media accounts are encouraged to create their own content according to the needs of their particular target audiences, they must keep the Vincentian key values of commitment, compassion, respect, integrity, empathy, advocacy and courage in mind.
13. Posts must adhere to the standards of conduct as described in the Code of Conduct and Respectful Workplace policy. Consequently, the following are prohibited:
 - a. Content of a risqué or a sexual nature;
 - b. Content that may offend people on the basis of their religious beliefs, ethnic or social background, health, gender, disability, political opinions or sexual orientation;
 - c. Content that may be considered slanderous or defamatory
 - d. Content that may be considered threatening, harassing or unlawful
14. Social media, accessible to the public, must not feature quotes from or photographs of people we assist and/or Society Personnel without their explicit consent via a media consent form. [Media consent form.pdf](#)
15. Society personnel should consider the potential safety and privacy risks prior to posting any content relating to people we assist and/or that could reveal information about the location of our domestic violence services.
16. Under no circumstances should Society Personnel use social media to friend, communicate privately or otherwise contact People We Assist, other than for the purposes of official Society business.
17. If members, volunteers or employees identify themselves as Society Personnel on their personal social media accounts, or they can be reasonably identified as Society Personnel, they should:
 - a. at all times, adhere to the Society's Code of Conduct and Respectful Workplace Policy
 - b. consider the impact of what they post on the reputation of the Society and their colleagues
 - c. be aware that posts on social media are subject to the same defamation, anti-discrimination and intellectual property laws as other publications, such as newspapers. Social media posts may also amount to bullying or harassment and an individual may be held to account anywhere in the world where online publications are downloaded
 - d. make it clear that they are not posting (or responding to comments) on behalf of the Society and therefore, not representing the Society by stating for example: "Views are my own personal views and are not held or representative of my employer"

- e. be aware that a disclaimer may not be sufficient to avoid a potential breach of this policy and if unsure, advice could be sought from a relevant authorised person before the use of social media.

18. Members, volunteers and employees are encouraged to endorse Society campaigns, policy positions and services in a personal capacity on social media and in doing so can share authorised content provided by the Society.

Definitions

19. Important definitions can be found here:

| Term in Bold | Definition |
|--|---|
| Social media | <p>A collective term for digital technology (websites and applications) that allow for communication, networking, and sharing of information and ideas. These include but are not limited to:</p> <p>Facebook, Instagram, LinkedIn, TikTok, Reddit, YouTube, Flickr, Pinterest etc.</p> <p>Weblogs including corporate blogs, personal blogs or blogs hosted by traditional media publications.</p> <p>Forums and discussion boards e.g. Asana, Basecamp, Whirlpool, Yahoo! Groups or Google Groups,</p> <p>Online encyclopaedias and other interactive 'wiki'-type sites e.g. Wikipedia, Bulletin boards and podcasts and any other websites that allow individual users or companies to use simple publishing tools or allow public comment e.g. online newspapers.</p> |
| Vinnies Official Platforms | <p>Facebook @VinniesAU @VinniesNSW @VinniesCEOSleepout @vinniesshopsnsw Instagram @VinniesNSW @ceosleepout @vinniesshopsnsw TikTok @vinniesnsw LinkedIn @vinniesnsw @Vinnies-ceo-sleepout Youtube @NSWVinnies X (Twitter) @vinniesAust and (@vinniesNSW, no longer active"24)</p> |
| Official Social Justice Statement | <p>https://www.vinnies.org.au/nsw/advocacy/social-justice-statements</p> |

Further assistance

20. The following individuals can provide advice about the implementation of this policy:

| Name | Title | Contact details |
|-----------------------------------|---|--|
| Thomas Morgan | Director of Communications and Marketing | Thomas.Morgan@vinnies.org.au |
| Satya Tanwer | Executive Director, Strategy & Engagement | Satya.Tanwer@vinnies.org.au |
| Marketing and Communications Team | | NSW.MarketingandCommunications@vinnies.org.au |
| Rachel Lawton | Manager, Marketing | Rachel.Lawton@vinnies.org.au |
| Kate Pascoe | Manager, Communications | Kate.Pascoe@vinnies.org.au |

Appendix 4: SVdP Storyteller Charter of Rights

[SVdP STORYTELLER CHARTER OF RIGHTS_FINAL.\(1\).pdf](#)

