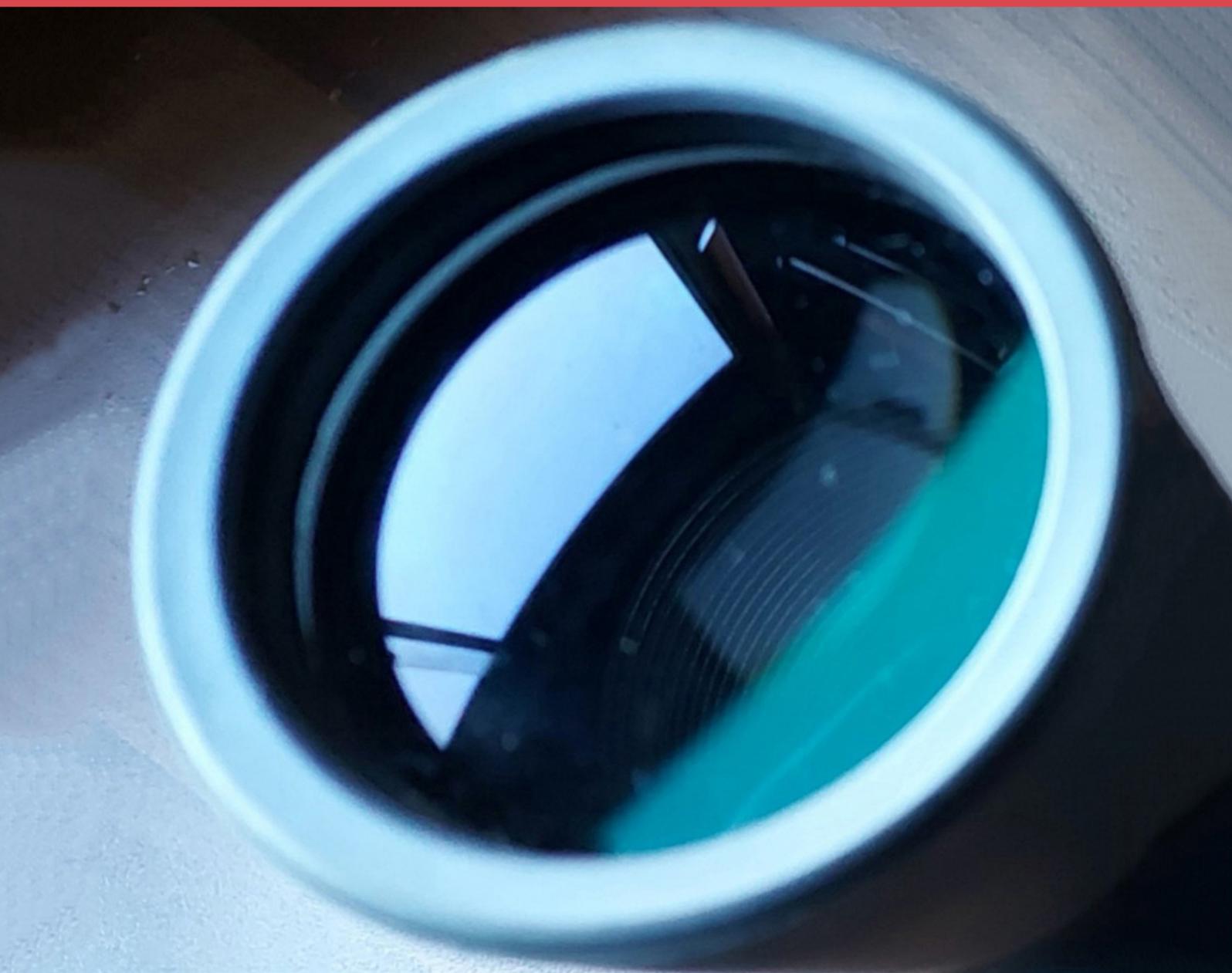# Shifting the Lens on Ethical Communications in Global Development:

A Focus on NGDOs in Ireland

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Please Note: Participant Names in this Report

Participants in interviews and focus group discussions were each allocated a pseudonym for the purposes of this report so that neither they nor the organisation they are associated with can be recognised. I have chosen to give some indication of their current area of responsibility with regard to communication with the following convention: 1 = general communications; 2 = fundraising and marketing communications; 3 = A combination of general communications, fundraising and marketing communications; 4 = citizenship, public engagement, education and advocacy communications; 5 = other. Thus, in this report, people are designated a name followed by a number to indicate their main current area of communications responsibility, e.g., Ruth – 2 or Victor - 1. This was not done for questionnaire findings reported here.

List of Tables, Boxes and Appendices

Executive Summary

Executive Summary

Concerns about the ways in which issues, peoples and places have been represented in global development (GD) communications have been raised since the 1980s. Criticisms have been levelled at media and non-governmental development organisations (NGDOs), including for their portrayal of colonial stereotypes, 'us' and 'them' binary relationships and identities, and their use of images of people in the 'global South' as undignified victims who are objects of aid. As communications are so central to all aspects of their work, NGDO representational practices can undermine their otherwise stated commitments to equality and solidarity, compromise their work in the area of public engagement, and threaten public trust leading to donor fatigue. With increasing calls for equality, diversity and inclusion (EDI) and the decolonisation of aid (Peace Direct, 2021), the question of whether NGDOs are part of the problem or the solution when it comes to their communications is coming more to the fore.

To support improved communications practice in the context of these criticisms, NGDOs have developed and signed up to various codes of good practice. The Dóchas Code on Images and Messages (Dóchas Code) which was agreed among NGDOs in Ireland in 2007, is one such voluntary code. Through signing it, organisations commit to ethical communications based on the values of dignity, equality, fairness, solidarity and justice. They also commit to a range of principles including that their images and messages would reflect these values, that people and issues related to GD would be represented in context, and that NGDOs would avoid stereotyping, ensure that people could tell their own stories, and that they would conform to the highest standards of human rights in their communications.

The ethical communications' emphasis in the Dóchas Code is on these values and principles and what NGDOs do through their communications across organisations in relation to them. Drawing on the wider literature (see Section 1), in this report, ethical communications is understood to include how values and principles are reflected in NDGO representations of people, issues and situations, along with the practices, decision-making structures, power relations, cultures and assumptions which underpin and relate to them.

Though many NGDOs in Ireland have become signatories to the Dóchas code since 2007, and it has been hailed as an example for how others might support ethical GD communications, in recent years formal resourcing of the Dóchas Code has waned, while the communications and GD contexts have shifted rapidly. In that context, it is important to understand how NDGOs in Ireland have responded to these changes in terms of their communications, and whether the Dóchas Code is still relevant, up-to-date enough, or sufficient to support ethical communications' practice now, many years after its introduction.

The Research

This research examines the current situation with regard to ethical GD communications in the case of Ireland and focuses on the relevance of the Dóchas Code in that context. It does so by drawing on primary research with sixty-one participants, most of whom work at different levels of responsibility, mainly in communications, fundraising and education across the NGDO sector in Ireland. Of the total, nine people work in other contexts, including three in NGDOs in the UK, and five people are of African descent. Participants participated in one or more online research experiences, in questionnaires (12), focus group discussions (13) and/or interviews (36).

Research Findings

Findings in this report highlight improvement in ethical communications since the introduction of the Dóchas Code but there is still a lot to be done. Though criticism is evident across participants' contributions, frustration with unethical communication practice, and a sense of urgency around improving it, is particularly demonstrated in the analysis provided by people of African descent who attribute experiences of racism in Ireland, in part, to NGDO communications. The experiences and insight provided by these and other participants in this research provide a strong rationale for the need for renewed commitment on the part of NGDOs to ethical communications, and for more robust leadership, regulation and learning to support the decolonisation of GD communications in this context.

What's in this Report?

This report is divided into an introduction, which outlines the rationale and methodology, and five main sections. Section 1 examines the literature on ethical communications, highlighting different approaches to it. In light of this, it suggests a 'Five Levels' framework for understanding and addressing ethical communications.

These 'five levels' are:

- the representational level – the use of images and language – what is said, shown, labels attached to people, captions, terms used etc

- the representational practice level – decision-making and practices around messages communicated, around photographs, campaigning, the brand etc

- the organisational structural level – organisational and institutional strategies, governance and priorities around communications, advertising, fundraising, use of social media, campaigning, education, relations with partners, communities NGDOs work with etc

- the organisational and institutional cultural level – organisational and institutional embedded assumptions, root narratives, beliefs and worldviews underpinning other levels of practice

- the broader contextual level – the wider social, political, economic and cultural influences on GD communications.

Section 2 examines critiques of development representations and explores participant analysis and experiences in light of them. Improvement in ethical communications is identified, especially in terms of moving away from 'the worst' forms of stereotyped representations, encapsulated by many in 'the flies in the eyes' type image. Direct response television (DRTV) ads stand out as the main carriers of this emblematic representation of traditional, undignified, victimising and charity-based communications still practiced by NGDOs. Looking beyond this stereotype of stereotypes, as evidenced in the experiences, analyses and testimonies of participants, in particular by people of African descent, concerns remain about many more subtle aspects of NGDO representations. As reflective of previous research, as discussed below, these problems relate to the portrayal of agency, how development roles, relationships and responsibilities are represented, and to a lack of complexity. They also reflect tensions which exist between the economic imperatives of fundraising, and education or public engagement aims. Where participants express the importance of communicating dignity, solidarity and agency, they highlight that NGDO messages which try

to do that are weakened by the use of stereotypes which generalise, reduce and infantilise; by transaction (or fundraising) frames (Murphy, 2014), which obscure structural cause and responses to GD challenges; and by representations which lack complexity and portray ethnocentric 'us' and 'them' binaries.

The profound negative effects of these representations on people of African descent living in Ireland in terms of their experiences of racism are evident here. While those interviewed here see direct DRTV ads as being particularly problematic, they also highlight the effect of NGDO communications overall on experiences of bullying, abuse and racism in Ireland. This presents a strong challenge to NGDOs to engage deeply and meaningfully with any part they play (as individual organisations or more broadly as part of the GD sector) in perpetuating stereotypes, colonial assumptions, racism and inequality.

Section 3 explores the constraints and opportunities for ethical communications presented by the shifting international and national GD context and by changes to communications worldwide. Fundraising emerges as a significant driver of NGDO communications in this research, with concerns over the competitive fundraising market seen to constrain ethical practice. This is identified as important beside the need for sophisticated communications to counteract donor fatigue, the challenge of taking risks with new communication styles, and of the shift to domestic concerns. The role of institutional donors is also highlighted in supporting organisations, including through filling any fundraising gaps which might emerge from more ethical communications practices. The Black Lives Matter movement emerges as playing a very positive role in stimulating conversations around ethical communications, in holding NGDOs to account, and in shifting them towards EDI and decolonising communications. In terms of the GD sector in Ireland, organisational tensions are reflected upon by participants in general around roles and responsibilities and fundraising and complexity. While acknowledging that fundraisers are under pressure, the need for conversations within NGDOs and a collective approach within the sector are highlighted. Meaningful work in this area is not easy and it needs to comprehensively engage with these tensions and the challenges people face in order to ensure meaningful change.

Section 4 builds on the discussion of the literature on aid effectiveness and on power, culture and change in NGDOs in Section 3, discussing research on different approaches to regulation. The value of forms of mutual accountability is highlighted as building ownership, while the need for more than technocratic approaches to regulation is stressed. The section also deals with the successes and challenges around implementation of the Dóchas Code in the Irish NGDO sector and lessons which can be brought from it for the future. Findings show that the Dóchas Code has become embedded in some organisations' practice, that many are clearly committed to it, but that application is mixed. As such, there are issues around loose, multiple and contradictory interpretations of its values when translating them into practice, and vague notions of what it involves. Findings indicate the need to update and revise the Dóchas Code, strengthening the implementation mechanisms around it and monitoring compliance. A stronger and more 'hands on' role for Dóchas as the standard bearer and 'professional body' of NGDOs is proposed.

Representing a radical departure from 'business as usual', as one participant put it, Section 5 highlights the need to go beyond 'tick-box', technical or superficial approaches to supporting ethical communications. This requires organisations to delve beneath language and representations to address communications culture and practices at all levels of organisations and in the NGDO sector. Thus, findings suggest that NGDOs need to decolonise GD communications through meaningful transformation and change at these levels in terms of leadership and regulation, learning and culture. This will require much more systematic engagement between NGDOs and

diaspora communities in Ireland as well as with NGDO partners around the world, and their more active involvement in shaping NGDO communications at all levels. The role of management in supporting change emerges very strongly from participants with calls for CEOs, members of senior management teams (SMTs) and of boards of management to play leadership roles on ethical communications through organisational strategies, senior management priorities and decisions made around key performance indicators (KPIs), especially with regard to fundraising. Without significant leadership from SMTs to diversify the types of communication promoted, to take risks in shifting representational practices, and to resource ethical practice, other efforts in this area are likely to have limited success. It also suggests a leadership role for Dóchas more broadly, in association with NGDOs and institutional donors, such as Irish Aid.

Section 5 builds on the future orientation of the previous section, outlining a 'third way' approach to regulation to support ethical communications among NGDOs in the sector. As a means of peer-regulation combined with some form of external monitoring, this would support an approach to regulation built on ownership and learning for change, while not undermining the importance of holding organisations to account. Such approaches are significantly undermined unless all involved in the sector are held accountable and unless they are accompanied by meaningful and critical learning experiences. Though the need for revised standards, guides and learning opportunities emerge strongly in this research, the research also shows that these alone are unlikely to improve practice sufficiently to address the ongoing problems with GD representations. Emphasis needs to be on implementation, on democratising participation in decision-making around communications and on the leadership, regulation, learning and ensuring the resources needed for it.

As such, findings show the need for implementation of equality, diversity and inclusion (EDI) and decolonisation measures in NGDOs and across GD communications at all levels. Work which has begun in this area needs further development in the GD sector in Ireland with specific reference to ethical communications.

Recommendations

In light of the above, the following recommendations emerge from this research for the promotion and support of ethical communications among NGDOs in Ireland:

For Dóchas

Support the development among members of a comprehensive Dóchas strategy for the promotion and support of ethical GD communications within the NGDO sector, which emphasises the decolonisation of development communications. This could be integrated into plans for the promotion of EDI organisational policies and practices and would involve the implementation of a new peer-regulation process around a revised Dóchas Code.

Identify and access sufficient financial and staffing resources, as well as NGDO management commitment, to meaningfully support the development of this strategy and the implementation of a new peer-regulation process and measures to decolonise communications.

A task group on ethical communications should be convened to review the findings of this research and to develop a strategy for implementing its recommendations. This includes the development of revised and updated standards and processes for ethical communications among NGDOs in Ireland along with guidelines and learning supports to realise their integration and implementation

in the sector. The task group should be comprised of representatives from the Dóchas secretariat and Dóchas member organisations, including a cross-section of members from among senior management, fundraising, communications and education personnel, as well as at least one third representatives of partner and other organisations, groups and expertise, i.e., from migrant and diaspora organisations, academia, youth, anti-racism groups etc.

As part of the Task Group's work, they should consider next steps with regard to the findings in this report to support Dóchas to:

> Review and up-date the Dóchas Code of Conduct on Images and Messages and the Illustrative Guide on the Dóchas Code.

> Further investigate options and support the implementation of a new peer-regulation process around the revised Dóchas Code.

> Work with Dóchas members on a range of supports to support learning and training on ethical communications.

Liaise, in particular, with fundraisers, seeking their input to these processes, and with CEOs of NGDOs around initiating research on alternative ethical advertising to current DRTV ads.

Liaise with Irish Aid, NGDO management and staff from across organisations, and representatives from NGDO partner organisations and migrant and other anti-racism groups in Ireland, to explore various roles they might play, and resources they may need to commit, to support ethical communications in the NGDO sector in Ireland.

Liaise with other international networks to ensure institutional funders' support for ethical communications processes within GD at an international level.

Re: Learning – Education and Training Supports

> Establish a section of the Dóchas website as an online portal dedicated to resourcing ethical communications including existing organisation and sector-wide guidelines, relevant education and training materials, readings, articles and blogs etc

> Develop a process to review all education and training materials being used by NGDOs in this area in Ireland and internationally before making them available on the website

> Investigate and make available appropriate learning and training opportunities for NGDOs on ethical communications. Emphasis should be placed on critical approaches while ensuring that they are appropriate for different cohorts working in and with NGDOs, e.g., Board members, SMT, photographers, partners etc.

> Develop learning guidelines for NGDOs for induction and on-going learning of staff and others.

> Establish peer learning and sharing opportunities as part of new peer-regulation process around the Dóchas Code

Work with appropriate further and higher education providers for the development of specialised learning opportunities on GD, anti-racism, decolonisation and ethical communications.

Re: EDI and Decolonising GD Communications

Identify, agree and support EDI and decolonising GD communications measures within NGDOs as part of the new peer-regulation process to be implemented to support ethical communications among NGDOs in Ireland.

Summary of Recommendations and Suggested Phased Implementation Plan

As indicated here, support for ethical communications is complex and challenging. As such, these recommendations might be introduced on a phased basis over a five-year period, similar to the table 1 here. The development and implementation of a strategy around leadership and regulation, learning and decolonisation, which is the main recommendation of this research, should be an integrated process which is developed over the coming years. This should involve the Dóchas secretariat and Dóchas Board, as well as management and staff of NGDOs and their partners, institutional donors such as Irish Aid, those who work with NGDOs, diaspora communities and others interested in or who are signatories to the Dóchas Code. While many of these recommendations are directed to Dóchas, they will require implementation by Dóchas members and significant support from NGDO management.

Table 1: Recommendations and Phased Implementation Plan

Timeframe	For Dóchas and Dóchas Members
2021/22	Bring NGDOs together for a discussion re: development of a strategy – liaison, in particular, with fundraisers.
	Liaison with Irish Aid and senior managers of NDGOs re: strategy and funding of this work.
	Liaison with NGDO partners and diaspora groups re: EDI and decolonisation measures.
	Form a task group to review research and develop strategy and next steps.
2022/23	Review and up-date the Dóchas Code and Illustrative Guide (including measures to decolonise GD communications).
	Develop a process to review all education and training materials being used by NGDOs in this area in Ireland and internationally before making materials available on the website.
	Investigate and make available appropriate critical learning and training opportunities for NGDOs on ethical communications. Emphasis should be placed on ensuring that they are appropriate for different cohorts working in and with NGDOs, e.g., Board members, SMT, photographers, partners etc.
	Investigate options around a peer-regulation process with some external compliance mechanism.
	Work with appropriate further and higher education providers for the development of specialised learning opportunities on GD, anti-racism, decolonisation and ethical communications.
2023/24	Support peer learning and sharing opportunities and opportunities for liaison between NGDOs and diaspora communities, conversations with partner organisations etc.
	Establish a section of the Dóchas website as an online portal dedicated to resourcing ethical communications including existing organisation and sector-wide guidelines, relevant education and training materials, readings, articles and blogs etc.
	Identify, agree and support EDI and decolonising GD communications measures within NGDOs as part of the new peer-regulation process to be implemented to support ethical communications among NGDOs in Ireland.
	Implement new, stronger regulation process which addresses ethical communications representations and representational practices, including EDI and decolonising measures.
2024/25	Enhance learning through appropriate opportunities for different cohorts working in and with NGDOs, e.g., Board members, SMT, photographers, partners etc.
	Develop learning guidelines for NGDOs for induction and on-going learning of staff and others.
	Review peer regulation process – dialogue with those committed to the process and others with the aim of enhancing the process.

Introduction

Introduction

In light of their significant role in global development co-operation, the importance of how non-governmental development organisations (NGDOs) communicate about and engage the public in development cooperation has long been recognised. Since the 1980s there have been many sector-wide attempts to enhance the ethics of development communications, to challenge stereotypes and to tackle the colonial representations and discourses evident among many NGDOs. In 1989, for example, a European wide code of conduct on images and messages was agreed. This was re-written in Ireland by Dóchas and popularised again since 2007 as the Dóchas Code of Conduct on Images and Messages (the Dóchas Code). Various concerns about ethical GD communications have come to the fore again in recent times, in light of the Black Lives Matter (BLM) movement and broader discussion within development circles about public engagement with different audiences (Hudson et al., 2020), and about equality and diversity, racism and the need to decolonise development (Darnton and Kirk, 2011; Dogra, 2012; Murphy, 2014; Peace Direct, 2021).

The Dóchas Code

Among NGDOs and Irish Aid in Ireland, there was widespread agreement with the principles of the Dóchas Code, designed to rid NGDO communications of stereotypes and simplifications and to ensure more dignity and respect for those represented in global development contexts. In 2019, there were 102 signatories to this voluntary Code. Though implementation was initially designed around a range of compliance measures, including feedback and complaints mechanisms, attendance at an annual peer review meeting, a survey or self-assessment form, and governance oversight of Dóchas Code implementation at organisational level, the range of measures has reduced significantly in recent years. With little oversight by Dóchas since 2015 due to staff changes and shifting priorities, along with new and more sophisticated communication tools, and pressures growing among NGDOs with expanding resource needs, the question is whether it is still relevant for NGDOs.

Changing Context for GD Communications

As indicated above, the context within which NGDOs communicate and the means by which they do so, have changed significantly since the initial development of the Dóchas Code. They have also changed since the introduction of 'The Illustrative Guidelines on the Dóchas Code' in 2014. Since then, as I discuss in Section 2, we have seen significant changes in understandings and critiques of development and in the global development cooperation context, including the sustainable development goals (SDGs). This has led to changes in the 'market' into which NGDOs advertise and seek donations, thus adding to organisational challenges when it comes to fundraising communications. Where communications are now understood to traverse NGDOs, i.e., across fundraising, mainstream and social media as well as through public engagement – advocacy, campaigning and education – there are additional challenges in terms of ensuring that ethical communications are applied across different forums or media with different groups for different purposes. With growing global reach and participation in social media communications by communities directly represented or affected by NGDO communications and the Black Lives Matter (BLM) movement, there are growing calls for changes to the types of images and messages being used, for integration of anti-racism and decolonial approaches to representation, alongside changes in organisational culture and decision-making influenced by EDI strategies.

When it comes to regulating practice, ethical or otherwise, significant changes to the landscape have also happened in the last fifteen years or so, since the agreement of the Dóchas Code. In line with agreements around aid effectiveness in Busan in 2011, and movements within development practice towards accountability, participation, localisation and universalism, e.g., with the SDGs, there has been a move towards new managerialism and attempts to measure development results. This, alongside more robust regulation of NGDO governance in Ireland and internationally, has put a spotlight on data protection (GDPR), on safeguarding (children and others involved in development), on national accountability and governance mechanisms (the work of the Charities Regulator) and on international industry standards, for example the Core Humanitarian Standard (CHS). Thus, while peer-regulation type good practice standards like the Dóchas Code are popular in the sector, for example the Comhlámh Code (Comhlámh, 2021) and the IDEA Code (IDEA, 2021), there is also evidence of stricter regulation and compliance requirements and practice in some areas of NGDO practice.

More Active Public Engagement

All of this sits as a backdrop to NGDOs experiencing an increased lack of trust in what they do (GOI, 2018: 36). As such, the need for more effective communications and education on sustainable development (identified in SDG 4.7) as well as more active public engagement in development co-operation, is now widely recognised (OECD DAC Peer Review Ireland, 2009, 2020; Irish Aid Development Education Strategy, 2017 – 2023; A Better World, 2018). Through its policy on international development, 'A Better World', the Irish Government, for example, highlights its intention to "strive for deep public understanding of and engagement with our international development policy and our aid programme" (2018: 36).

Though Dóchas has been to the forefront of supporting good practice in development communications through its implementation of the Dóchas Code of Conduct on Images and Messages for many years and in tracking of public attitudes to global development through commissioned research (Amárach, 2013, 2015; McShane, 2021), in recent years, along with the Irish government, it has become increasingly conscious of the need to encourage more active public engagement with development cooperation and the SDGs in Ireland. At its annual conference in 2019, 'Finding our Voice: How Civil Society is Countering Uncertainty', with 250 in attendance, Suzanne Keatinge, CEO of Dóchas, called for the development of a counter narrative to hate and other obstacles to positive change, equality and justice in Ireland – a narrative based on hope, the collective and the possible. Dóchas is acutely aware that although a large percentage of the Irish population believe in aid in principle, this level of support sits upon fragile underlying perceptions.

Repeated surveys of attitudes to global development have shown that Irish public understanding is relatively superficial and that engagement with global development and the SDGs needs to be broadened and deepened, through development education, public engagement and wider organisational communication strategies. It was with this in mind that Dóchas undertook, in 2021, the Worldview research project. Focused on identifying different audiences in Ireland and their views on development, it was designed to focus on what publics will respond to; how to engage them more comprehensively in development issues and how to unite NGDOs behind meaningful narratives of change.

Worldview Research

The recent 'Worldview' research (McShane, 2021), commissioned by Dóchas, provides important insight into different responses among different cohorts of people in Ireland to NGDO communications. As such, it represents an important complement to this work. Where it focuses on audience response, this research is directed towards the ethical issues involved in what NGDOs do that people respond to and to their responsibilities in that regard. A number of important context-related findings emerged. Though research shows ongoing interest in and support for 'helping those in developing countries' among people in Ireland, many people continue to have a limited understanding of global issues and causes of poverty. This is clear from findings with regard to their analysis of 'the causes of poverty in developing countries', with 44% of respondents identifying "Government and private sector corruption in those countries" as a main cause, putting it in top place and 31% identifying "government inefficiency or incompetence" as a main cause, putting it in third (McShane, 2021: 49). That "war and conflict" and exploitation of 'developing countries' also appear strongly provides some nuance to that analysis.

The Worldview research also provides some very interesting insights into different 'segments' of the population when it comes to their views and engagement with GD issues and overseas development assistance. Two points of note emerge: though most people still get most of their news and information from the TV, most of those who are in the younger cohorts (up to 24) get significantly more of their news from social media. Similarly, young people are significantly more likely to participate in activism around racial equality issues than older cohorts. This would seem to bear out the findings presented in this report where research participants experience young people responding differently and less favourably to traditional NGDO communications than older cohorts.

Why This Research?

While the Worldview research begins the process of assessing what different cohorts respond to in terms of GD communications, to date, there is very little research on NGDO representations or communications of global development within the Irish context. A notable exception is the 'Finding Irish Frames' research (Murphy, 2014) which aimed to explore whether, through dominant frames such as 'help the poor', poverty or charity, NGDOs were contributing to "low levels of public knowledge about the underlying causes of poverty, and lack of engagement with development issues as a whole" (2014: 9). It is also the case that very little research has been done on NGDO engagement with the Dóchas Code – how it has shaped (or not) their communication and what they see as the future of good practice (related to the Dóchas Code or not) in GD communications. In light of growing concerns around public trust in NGDOs and the acknowledged need by Irish Aid, Dóchas and others for more engagement with development co-operation, this research focuses on issues, concerns, challenges and priorities around ethical communications among NGDOs in Ireland and, more specifically, on the contemporary relevance of the Dóchas Code of Conduct on Images and Messages for supporting ethical communications in the sector.

Questions Guiding the Research

In light of the above, this research addresses the following questions:

● What are the main issues, concerns, challenges and priorities with regard to ethical communications among NGDOs in Ireland?

● How relevant is the Dóchas Code for supporting ethical communications among NGDOs in Ireland and what is needed for the future?

Research Approach and Methodology

Given the importance of ethical communications on framing and shaping identities and relationships, for this research, I applied a critical research perspective (Kincheloe and McLaren, 2005) which views all research as political and potentially transformative. In this case, that means that research processes were structured to support critical engagement with NGDO practice for the improvement of global development representations and communications. As the research aims to understand how those involved in communications across NGDOs (among others) interpret ethical communications and what they see as the priorities, I adopted a qualitative approach, which focuses on producing an in-depth understanding and critical analysis of the topic rather than producing statistical, generalisable data. Thus, this report draws on primary research with a view to explicating various aspects of the topic rather than trying to quantify. Drawing influence from a critical discourse analysis (CDA) methodology (Fairclough 1992, 2003; Van Dijk, 2007), the research addresses discourses and representations, i.e., the use of images and messages in NGDO communications. Understanding discourse as multi-layered, here, I use the term discourse to apply to the use of images and messages – instances of discourse – as well as to the ways in which these images and messages are framed – discursive formations – and to the broader knowledge systems, ideologies or paradigms which underpin them – discourses (see Dillon, 2017). I regard them as constructed in social, political, economic and cultural contexts, and as subjects of contestation, in this case, in particular, in relation to GD organisation and institutional spaces. In this research, representations are understood in their broader organisational and institutional context. As such, the emphasis is on understanding what drives NGDO communications and how they are organised and structured within organisational and institutional contexts, as well as on their effects.

The approach taken here also draws from interpretive and participatory research approaches. It does not start from an analysis of text and images, as in many CDA approaches, rather it draws on the experience of those involved and on their analysis of what is important – what they see as the main challenges with regard to NGDO ethical communications, what they see as driving communication strategies and what is important to them in this area. Their interpretations are analysed and presented here in light of other research in the area.

Drawing from these different methodological influences, I applied a mixed-methods, multi-stage methodological approach to the research which supported the active participation of Dóchas members in its processes and outcomes. Given the qualitative and non-representative nature of the research, a purposive sampling strategy was applied where those most relevant to the research were invited to participate. Though this is always acknowledged as a limited approach, in that the sample is small and necessarily limited and it does not produce verifiable or generalisable research data, it does ensure that the data generated are rich and relevant and they can support further research with different (also important) cohorts of participants. As such,

aware of the limitations of the sample, as the research was focused on ethical communications within the NGDO sector in Ireland, I emphasised the importance of engaging participants involved in implementing communications in that context. At the same time, I wanted to augment this focus with the contributions of key informants with an interest and expertise in this area, in Ireland and internationally, and with the experience of those working with migrants in Ireland who may be affected by NGDO communications.

Participants Involved and Research Tools

In practice, sampling involved an initial broad call for participants among those in receipt of the Dóchas Wednesday newsletter as well as more targeted approaches to those involved in the Dóchas communications working group, the Dóchas development education working group and members of the Worldview project steering group. NGDO Fundraising and marketing managers were also directly invited to participate in the research by email, as were staff and active members of migrant organisations. Snowball sampling was also used with regard to identifying key informants and those involved in GD communications in other countries or contexts.

Participants were invited to participate in a questionnaire, interview and/or focus group discussion. These were designed to address different aspects of the research topic (see Appendices 1 and 2 for copies of the topic guide and the Questionnaire) and to enable participants to choose the means by which they would participate that would be most suitable for them. As the research was conducted during the COVID-19 pandemic, all of these tools were only available online. Though there were many limitations associated with conducting the research online, not least of which was ensuring the widest possible participation in the research, most participants chose to be interviewed. These were conducted via Teams or Zoom, usually over an hour, between November 2020 and April 2021. Recording was done via audio recorder and typed notes from which transcripts were developed. Due to COVID – 19 and other time-related constraints, not as many participants from migrant groups were able to participate in the research as I would have liked and it was not possible to extend the research to those working as partners of NGDOs in other countries. Other important research has focused on ensuring that those who are most directly affected by NGDO communications are central to the research process (Warrington and Crombie, 2017 and Warrington and Ademoulu, 2021). Overall, despite the challenges, questionnaires, online interviews and focus group discussions provided considerable insight into the topic and rich data for analysis.

In all, sixty-one people participated in the research in 31 individual interviews (including 19 from communications, marketing and fundraising and 7 from development education and public engagement), 2 paired interviews, 2 focus group discussions and 12 questionnaires. (see Appendix 3 for a breakdown of research participants). These included participants from across the NGDO sector in Ireland and internationally, as well as participants from migrant groups and other contexts. Overall, 38 work in management or senior management roles, 17 in officer roles and 6 others with different relevant experience. (Please see Appendix 4 for a list of organisations where participants work). As outlined above, though not designed to be a representative sample, for the type of qualitative research involved, it includes a wide range of perspectives and experiences, and it provides comprehensive in-depth data.

Limitations and Researcher Positionality

The limited scale of the research was built into the initial design of it as a modest piece of research to be undertaken over a few months part-time by one principal investigator and one assistant. Challenges in this regard were compounded by the COVID-19 pandemic which made participation by some people difficult, and it led to an extension in the time required for undertaking the research.

The research, and any reading of it, is also affected by my position as a researcher on this project. As a white, middle aged, middle class, female academic I bring a level of privilege to this research that many involved with NGDOs or affected by their communications do not share. One of the fears I had in undertaking this research was that I would not do the importance of this issue justice. My commitment to promoting ethical communications among NGDOs in Ireland through involvement with Dóchas and in training on the Dóchas Code over many years, no doubt has shaped the way I approached this research in the first place, what I heard and how I made sense of it. This is the stuff of qualitative research where power relations and positionality are widely acknowledged as having an effect on the research. In this case, transparency about any research process and reflexivity around how one's position might shape the research is widely considered to add to the credibility of the research.

A second fear I had when starting this research was that it would be dismissed because of my background in development education and development studies and not in fundraising, communications or anti-racism. As such, on the one hand, I run the risk of this research being dismissed by those who feel I do not fully understand them or their work because I have not experienced their stress or the pressures they are under to fundraise. Over many years of training on ethical communications I have heard the frustrations of many in NGDOs directed at those who question their practice because of what they see as the urgency and pure necessity of raising money to support the poorest people. That kind of questioning evident here comes largely from within the NGDO sector, but it can still be difficult to read when the pressure is on or when it challenges taken for granted practice. Similarly, from those outside of the 'development circle', or those of African descent in Ireland, my imbrication in development and work in association with Dóchas, or my white Irishness, could be seen to present a barrier to radical transformation and decolonisation of GD communications within the sector.

At the end of the day, readers decide whether the research is credible or not. Cognisant of how my interest in this topic might shape the research, I was mindful of not wishing to distort or under-represent any perspective I disagreed with. Similarly, I made every effort to keep an open mind, to engage with the different experiences and perspectives which emerged and to try to understand them 'through the lens of the speaker' and in light of existing research. One way of trying to ensure this was to present the points that different participants made in detail rather than trying to condense them too much or to simplify them. This allows the reader some chance to interpret my analysis and to come to their own conclusions, at least to the extent possible. At the same time, I did not approach this research as an 'independent outsider' but rather with the hope that it would contribute to supporting meaningful ethical communications among NGDOs within the sector.

Ethical Research Considerations

As in all research, considerations around ethics and the influence of my positionality as a researcher were of paramount importance for this research to ensure the protection of participants and the integrity of the work. Aware that I would have been known by many of the prospective participants in different capacities, but not known at all by others, I was keen to ensure that the research would be conducted as respectfully and carefully as possible. Furthermore, because of my engagement in research, education and training around the Dóchas Code over many years and how that might be perceived differently by prospective research participants (perhaps both positively and negatively), I emphasised the openness and exploratory nature of the research.

In trying to ensure as much safety in participation in the research, I introduced different formats, an anonymous questionnaire, interview and focus group, and I liaised with Dóchas in making contact with participants. I explained that while the research was being carried out in association with Dóchas, it was independent research and I emphasised my hope that it would reflect a broad range of perspectives, including from people not working in the GD sector in Ireland.

In terms of applying ethical principles to research practice which supports protection, I tried to follow good practice with regard to respect, transparency, full consent and anonymity. To that end, ethical procedures followed Irish Research Council and Maynooth University guidelines, and requirements, permissions and consent issues were explained in full to participants and all were asked to complete a consent form. I explained to participants that they could withdraw their permission at any point, that their information would be treated anonymously, i.e., that they would not be named (or to the extent possible, identifiable) in the report, and that they would be invited to discuss findings with me at a workshop later in the research process. In advance of interviews, I asked permission to audio record and to take typed notes of conversations and to list the names of organisations that participants were currently working with, where relevant.

Participant Names in this Report

Participants in interviews and focus group discussions were each allocated a pseudonym for the purposes of this report so that neither they nor the organisation they are associated with can be recognised. I have chosen to give some indication of their current area of responsibility with regard to communication with the following convention: 1 = general communications; 2 = fundraising and marketing communications; 3 = A combination of general communications, fundraising and marketing communications; 4 = citizenship, public engagement, education and advocacy communications; 5 = other. Thus, in this report, people are designated a name followed by a number to indicate their main current area of communications responsibility, e.g., Ruth – 2 or Victor – 1. This was not done for questionnaire findings reported here.

A Note on Terminology

As concepts and language are central to this research, I explore different understandings of many of the concepts applied in it in greater depth throughout the report. Here, for clarification, I briefly explain why I am framing the research around some key terms and outline some of the meanings I am applying to them here. I do so, bearing in mind that:

- The language of global development is contested, slippery and 'fuzzy'. Eade and Cornwall (2010) talk about development 'buzzwords and fuzzwords', where the same words or phrases can be infused with many meanings, some of them more or less radical or transformative than

others. This can bring confusion and obfuscation and, as development can mean all things to all people, it can enable an 'anything goes' situation which favours 'cosy consensus' rather than 'critical debate'. Cornwall highlights that this taken-for-granted language of development "leaves much of what is actually done in its name unquestioned" (2007: 471). Thus, it is important to understand how a concept is being applied in any context.

- That discourses of global development (language, images, reports, policy speak, ads etc.) are often replete with underlying modernist and ethnocentric assumptions and ways of thinking which support notions of (and practices based on) global Northern supremacy, paternalism, individualism and capitalist economism. Even when the language changes to include the language of solidarity, partnership, participation, human rights and alternative developments, how it is organised and practiced still often supports existing power relations and ways of thinking.

Thus, in this report, I try to nuance or qualify my use of different terms and to avoid the use of offensive ones.

Ethical Communications – This research is framed around the concept of ethical communications to address the values, politics and effects of communications associated with representational practices, organisational structures and cultures. This is discussed in detail in Section 1.

Discourse – I am using the term discourse here to refer to broadly coherent sets of assumptions or patterns of making sense of the world. Discourses operate at different levels and the term is often used simultaneously to apply to instances of text, language and the use of images (what I discuss below as representations), as well as to the frameworks of thinking or assumptions which underlie them.

Global Development – GD – As I use it here, the term global development (GD) is used with reference to different understandings, practices and institutions related to the political, economic, environmental and social development of peoples and places. As such, I regard it as discursively constructed differently by different actors (NGDOs and others) in different institutional contexts.

GD Communications – I understand GD communications as the representational and communication practices relating to GD across organisations, which are the products of multi-layered power relations within and outside the organisational contexts where they are produced. Analysis of these different layers of communication is discussed in Section 5 with reference to suggestions for transforming practice in the Irish context.

Non-governmental Development Organisations – NGDOs – These are a broad array of organisations usually associated with civil society that have a formal structure and that are involved in some way in GD. Their scale and areas of work differ, with some focused on specific aspects of GD, e.g., gender equality, climate justice, development education (DE) or humanitarianism, and others traversing these and other areas.

The Dóchas Code of Conduct on Images and Messages – The Dóchas Code – This is a code of good practice agreed among NGDOs in Ireland in 2007 with a view to supporting ethical communications in the sector. It is discussed throughout this report and is explained in more detail in Section 4.

Section 1:
Understanding Ethical Communications among NGDOs

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Existing Research

Ethical Communications

Discussions around what constitutes 'ethical communications' can come from many directions and take many forms. For most people, ethics is about right and wrong, what one should or should not do. It's about guiding principles and values and how they translate into commitments and action. When it comes to GD communications among Dóchas member NGDOs in Ireland, the Dóchas Code of Conduct on Images and Messages, thus far, is the agreed framework for shaping ethical communications. Incorporating the values of dignity, equality, fairness, solidarity and justice, organisations commit to acting responsibly across a range of areas with regard to the images and messages they use (see Appendix 5 for a copy of the Dóchas Code).

Though this understanding of ethics is quite straightforward, and it outlines some important and widely accepted values, it says very little about power and politics – the difficult decisions that have to be made around ethical practice; areas of disagreement because of different perspectives, interests, priorities or ideologies; or about how what's considered ethical is often significantly affected by social, economic and cultural factors. Thus, questions about ethics are as much about politics as they are about values. Ethics is not just about tangible decisions that are made and actions taken but about the assumptions which relate to them, the cultures underpinning them and their effects. As such, they are tied up with knowledge, with the way we construct the world, with languages, practices and power relations. Here, I introduce a few key ideas from important theoretical approaches which help to understand questions around ethical communications.

Understanding Ethical Communications

Interpretivist, Critical Theory and Political Economy Approaches

Different theories of ethical communications address a range of questions around what constitutes ethical communications practice and how it can be achieved. These include questions around whether communications should be seen as neutral and objective or not. What constitutes the truth? What values are important and why? How do ethics relate to power, knowledge and the economics of communications?

Clifford Christians' (2014) work is helpful here. He explains different ideas about what ethical communications entail beginning with a critique that interpretivist approaches bring to technical, modernist thinking around communications. Communications is not about neutrally or objectively shaping the world and realising organisational goals, he argues, but it is affected by those involved in it and their values and positions. Social responsibility theory, he explains, emphasises communications' responsibility to the community. When applied to media practice, he argues that the ethics of responsibility requires an understanding of truth beyond accuracy of information. This is about enabling "readers and viewers to identify fundamental issues themselves" (Christians, 2014: 233), the flourishing of different "cultures, ethnicities, and religions" (ibid) and "activist journalism" (2014: 234), or activist communication, which democratises communication channels and approaches.

In cultural studies, the emphasis in ethical communications is on the link between values and politics and communication for social change. This is communication ethics influenced by critical pedagogy (Freire, 1970; Dillon, 2017) and cultural theorists like Stuart Hall (discussed below), and it identifies modern, persuasive means of communication, not as simply information devices but as agents of propaganda. Christians (2014) argues that this can have a significant effect on new forms of oppression and on the need for forms of communication which support critical and public debate.

Critical theorists situate ethical communication in the context of broader economic, social, political and cultural power. In this regard, the work of Jurgan Habermas has become central, with his critique of the colonisation of communications by the market and theory of communicative action. Though often criticised for being too idealistic, his emphasis on the role of communication as part of human interaction and on dialogical forms of communication are important. As too, according to Fuchs (2016), are considerations around how communication is linked to capitalist domination, where the emphasis should be on emancipation of communication from dominant systems. Mosco (2009) argues that it is important to understand the effect of globalisation and the growth of activism on communications.

Critical theory perspectives on communication overlap with critical pedagogy concerns about education as a form of communication for transformation. As such, they break the instrumentalist barrier where communication is seen as offering a technical, unidirectional, 'banking' approach to information sharing. They see communication and education as overlapping through participatory processes of engagement and critical reflexivity and peer learning.

Each of these theories emphasises the relationship between ethics and politics in communication and highlight the tensions which exist between the economics of communication and communication for transformation. As such, they show how the role of communications is contested in terms of different communicators, purposes and contexts. These theories also show that communications are not neutral or objective; that we need to broaden our understanding of truth to include depth, nuance, subjectivity and positionality; and they highlight diverse activist, dialogical and education dimensions to ethical communication. In this way, ethical communication is linked to politics and the economy, practices and systems, organisations and institutions. People draw on their values and ideologies in their communications, which are shaped by and in turn shape cultures of communications and organisational communication systems. In this research, these many dimensions of GD communications emerge as significant.

Post-structuralism, Post-colonialism and Feminist Approaches

Insights from post-structuralism and post-colonialism are also important for understanding the socio-cultural, political and economic aspects of ethical communications. As with critical theory, this is a vast area of consideration, much of which is outside the scope of this report. Here, I merely want to highlight a few key insights with regard to representational practices, coloniality and discourse analysis which are important for understanding ethical communications among NGDOs.

Different theories have long highlighted the relationship between knowledge and power and the significance of language and visual representations as produced by and producers of culture, ideology and political-economic realities. In short, 'words make worlds'. Insights from linguistics and semiotics have highlighted the importance of the symbolic world of language (itself a construction within different contexts) in framing, and hence creating, practices and institutions – what is said or not said, how an issue is framed in policy or through media advertising, for example, is seen to

influence the ways that people relate to others, their behaviour, how governments prioritise certain groups over others in budgets, or whose voices count in a particular situation etc.

Michel Foucault, for example, (1972) argued that communication cannot be seen to take place between autonomous individuals as a range of embedded assumptions, practices and power relations shape the ways in which people communicate with each other, and the limitations of what's possible or imaginable in different contexts. Thus, it is important to understand the different 'regimes of truth' (or discourses) which influence communications, to be attuned to the ways in which different people and situations are represented, and to take account of the different power relations shaping them.

In light of mass media communication and, in more recent years, in the face of the digital revolution, attention to how people and situations, issues and solutions are presented (or represented), the language and images used and the messages communicated has become ever more important. Edward Said (1978) applied Foucault's understanding of discourse to his study of Orientalism, which he argues is an academic discipline, a style of thought based on a "distinction made between "the Orient" and (most of the time) "the Occident" and "a Western style for dominating, restructuring, and having authority over the Orient". He argues that "without examining Orientalism as a discourse one cannot possibly understand the enormously systematic discipline by which European culture was able to manage—and even produce—the Orient politically, sociologically, militarily, ideologically, scientifically, and imaginatively during the post-Enlightenment period" (1978: 11). Arturo Escobar (1995) applied the same framing to his application of discourse to his post-development analysis of development. Though many see post-development critique of developmentalism – the belief in progress, modernisation and using the global North as the tacit example of development; assumptions about underdevelopment being disassociated from capitalist globalisation etc – as overly deterministic or unitary, the criticism remains that much of what happens in the name of development is based on ethnocentric, economistic and modernist notions of progress (Ziai, 2015).

The question of how post-structuralist influenced critique relates to ethics remains a challenging one as theorists like Foucault focused on power relations and resistance rather than on values and agency. At the same time, Chaput (2018) outlines that in his later lectures, Foucault focuses on how people engage in "truth-telling from a position of vulnerability… The goal of these practices—employed under the imperative to care for oneself—is to become someone who maintains a critical attitude with regard to those in power and their practices". This emphasis on the connection between critique and "ethical speech" (Chaput, 2018), resonates with Spivak's post-colonial concern about the importance of subaltern voice. At the same time, in her famous article 'Can the Subaltern Speak?' while Gayatri Spivak highlights the importance of Foucault's critique of epistemic violence, she is critical of his lack of focus on what she calls "the clearest example of such epistemic violence… the remotely orchestrated, far-flung, and heterogeneous project to constitute the colonial subject as Other" (1988: 76).

In short, post-colonial theorists critique the dominance of enlightenment rationality, of political and economic imperialism and the absence of respect for indigenous knowledges and diverse ways of knowing and being. In terms of ethical communications in GD, this can translate into an excessive Eurocentrism or Western bias. In contemporary theorising, concerns about these have translated into calls to decolonise everything – knowledge, higher education, development, development organisations and development communications. In relation to communications, this involves ensuring that knowledge, representations (how people, issues etc are presented in communications), and ownership, power and decision-making processes surrounding

communications are democratised, and that diverse knowledges and knowledge systems are valued and reflected in all aspects of communication.

Over many years, different feminisms have complemented strands of post-colonialism and post-development. In their critiques of objective, Western forms of communication practice, which serves the interests of elites, they address the marginalisation and exploitation of women, gender power relations and gender identity, recognition and redistribution (Fraser, 2013). Influenced by standpoint theory, feminism has brought to considerations of ethical communications analysis of gender roles and stereotypes. Furthermore, there are critiques of gender power relations in communications, understanding of the links between the personal and the political and intersectionality, alongside sensitivity to the fact that women's experiences are often under-valued and silenced in mainstream accounts of realities. At the same time, post-structural, Black or post-colonial feminisms, for example, explore different constructions of gender and women in NGDO representations while arguing that women's experiences cannot be homogenised or essentialised. All standpoints are important, but partial. Along with post-colonial critique, feminist perspectives also open up broader issues around power, identity, representation and participation as central to considerations of ethical communications. In terms of GD communications, as discussed below, feminist critiques highlight the false binaries between victims and/or heroes (Corbett, 2014); the over-emphasis on women (and children) in need of 'saving' (Murphy, 2014); erasure of men (Dogra, 2014) and neglect of structural barriers around gender equality.

From post-structuralism, post-colonialism and feminism, therefore, understandings of ethics (and ethical communications) emphasise knowledge, power and subjectivity. Influenced by these perspectives, especially in their application of Foucault's insights on power and knowledge, the understanding of ethics I apply here is one where ethics is concerned with politics and knowledge and the ways in which values and decisions, principles and practice, relationships and power go hand in hand. Agreed ethical frameworks, for example, around ethical communications, are not fixed but negotiated and contested in different contexts. As such, it is important to understand what shapes them, the power relations, discursive and organisational practices which support them and their effects on social, political, economic and cultural realities.

Approach to Analysis of Ethical Communications in this Research – The 'Five Levels Framework'

As we can see in the discussion above, there are many different ways of understanding what's involved in or important in relation to ethical communications. Exploration of ethical communications include power, knowledge, ideas and representations of people and issues and situations. It relates to what NGDOs do in and through their communications across organisations and in the broader context of the development cooperation field, and to the impacts of this on audiences, at home and abroad.

This research applies insights from critical cultural theory, especially the work of Stuart Hall (1997), and from post-structuralism, post-development and post-colonialism to understand ethical communications among NGDOs at a number of levels. I draw on Stuart Hall's understanding of language to include not only the spoken or written word, but "any sound, word, image or object, which functions as a sign, and is organized with other signs into a system which is capable of carrying or expressing meaning" (Hall, 1997: 19). Hall adopts a constructivist approach to representation which sees "meaning constructed in and through language" (1997: 15). Thus, at the top level, we can understand ethical communications in terms of NGDO representations of

and around GD. In doing so, here, I focus on how those involved in the research interpret these representations; the messages NGDOs are conveying; their views on the principles, values and meanings associated with these representations; and how they interpret their effects.
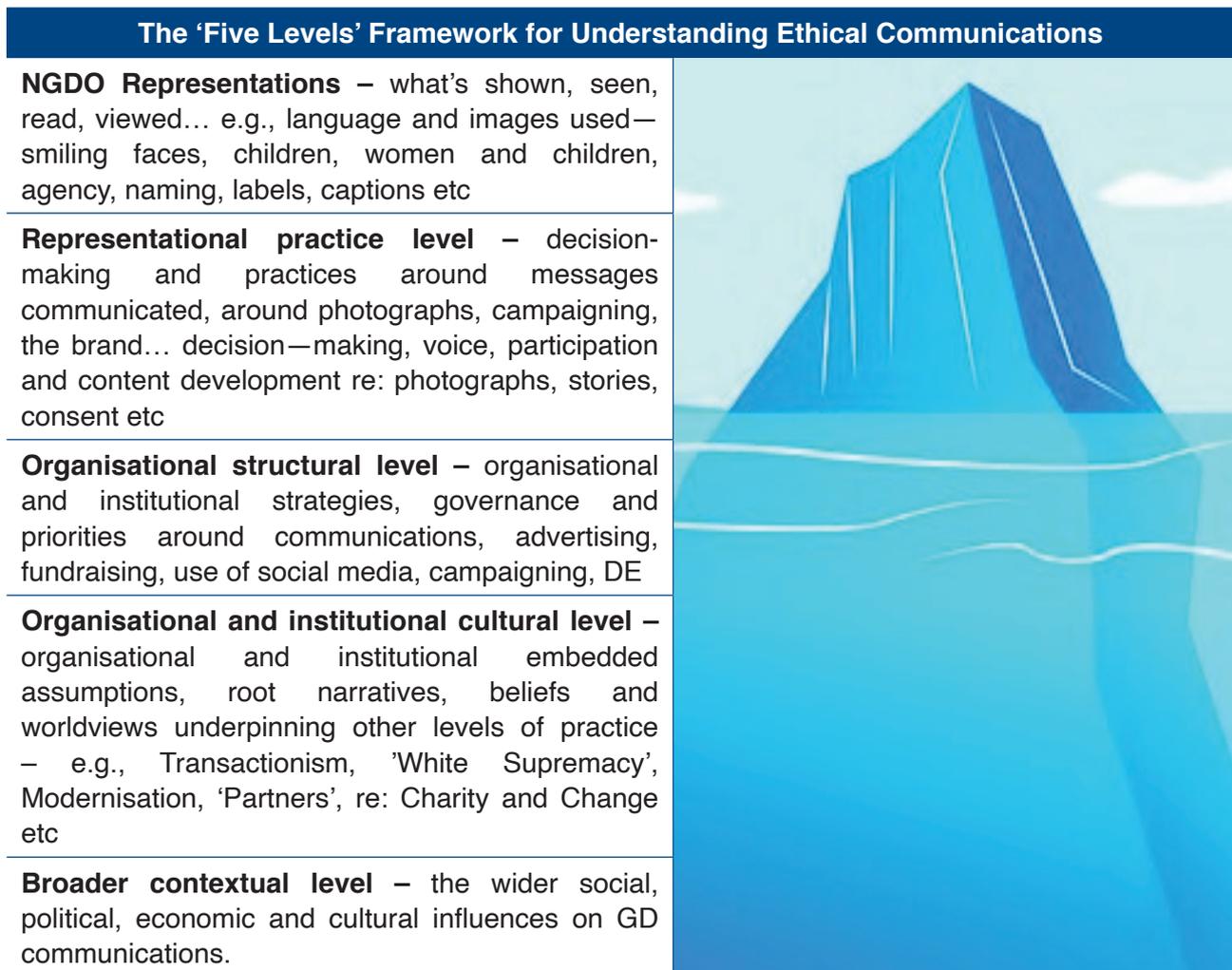
Fairclough's approach to Critical Discourse Analysis (CDA) (1992) is helpful in explaining that any understanding of representations (images and messages and the meanings associated with them) needs to be supported by deeper analysis of what shapes them – the power relations, culture and the narratives or worldviews which have become embedded in global development practice. Thus, he outlines the importance of understanding discourses, and in this case, the images and messages used in NGDO communications, at three levels. Fairclough points out that "any discursive 'event' (i.e. any instance of discourse or what Hall understands as representation) is seen as being simultaneously a piece of text, an instance of discursive practice and an instance of social practice. The 'text' dimension attends to language analysis of texts" (Fairclough, 1992: 4). This is the representational level above. "The 'discursive practice' dimension… specifies the nature of the processes of text production and interpretation…" (ibid). This is what I call the 'representational practice level'. This includes decision-making, and ensuring diversity and participation in content development.

For Fairclough, "the 'social practice' dimension attends to issues of concern in social analysis such as the institutional and organisational circumstances of the discursive event and how that shapes the nature of the discursive practice, and the constitutive/constructive effects of discourse" (Fairclough, 1992: 4). I identify three levels associated with 'social practice' which are worthy of investigation and analysis here. These are: the organisational structural level, the organisational and institutional cultural level and the broader contextual level, i.e., the wider social, political and cultural influences on GD communications. [See Diagram 1 below] The organisational structural level provides some insight into organisational strategies, decision-making processes and their priorities around GD communications whereas the cultural level addresses the embedded assumptions, root narratives, beliefs and worldviews underpinning other levels of practice.

Considerations around organisational structures and culture are important because GD communications – the images and messages used, how decisions are made, questions about who speaks, about what and to whom, for example, are all questions around power. As such, they need to be understood in all their complexity and with regard to how they are influenced by power relations within and external to organisations themselves. Mease (2017: 15) argues that because organisational discourses are embedded in broader social discourses, it is important to understand "how dominant discourses associated with social identities are taken up and reinforced in organizational contexts… [and how] everyday interactions and text both draw on existing discourses and, in turn, shape those discourses". For our purposes here, these insights from Foucauldian-inspired organisational communication analysis help us to focus on power in relation NGDO communications around GD – the GD discourses drawn upon, reinforced, supported or challenged through the different images and messages portrayed in different contexts across NGDOs. At the same time, as communications are also hugely influenced by other cultural, material and relational factors, it is important to identify and understand the broader historical, cultural, economic and political context shaping GD communications within organisations at any particular time.

These levels are illustrated in Diagram 1 below.

Diagram 1: The 'Five Levels' Framework for Understanding Ethical Communications

The 'Five Levels' Framework for Understanding Ethical Communications	
NGDO Representations – what's shown, seen, read, viewed… e.g., language and images used—smiling faces, children, women and children, agency, naming, labels, captions etc	
Representational practice level – decision-making and practices around messages communicated, around photographs, campaigning, the brand… decision—making, voice, participation and content development re: photographs, stories, consent etc	
Organisational structural level – organisational and institutional strategies, governance and priorities around communications, advertising, fundraising, use of social media, campaigning, DE	
Organisational and institutional cultural level – organisational and institutional embedded assumptions, root narratives, beliefs and worldviews underpinning other levels of practice – e.g., Transactionism, 'White Supremacy', Modernisation, 'Partners', re: Charity and Change etc	
Broader contextual level – the wider social, political, economic and cultural influences on GD communications.	

As evident in this section, there are different and contested understandings of communications and ethical communications among NGDOs. Different perspectives on ethical communications highlight the tensions around economic imperatives and those of transformation, as well as the difficult relationship between GD communications, coloniality and racism – with NGDOs on the one hand aiming to challenge them while on the other, often reproducing them. These issues are explored in detail in later sections with discussions around representations and representational practice as well as the broader context shaping GD communications among NGDOs in Ireland, and what is needed to support ethical communications in the future. Before doing so, I present some findings from research participants, understandings of communications and ethical communications.

Participant Research Findings

In this sub-section, I present findings from the research with reference to participants' understanding of communications and ethical communications before introducing findings on how representational practices have changed or not, and the messages participants want NGDOs to convey.

Understandings of Communication and Ethical Communication

Participants in this research understand communications in multiple ways. While people talk about 'comms' as referring to the specific function of communicating through mainstream and social media, where organisational messages and 'asks' are communicated to supporters, the public, interest groups etc, the term is also used to apply to communications across a range of functions within the organisation. One person in the questionnaires, for example, suggested that *"communications is understood as a key component to everything we do and spans all areas of our work".* Elena – 4 who works for a big NGDO explained:

> " *"there are so many elements to our advocacy and comms – if we go through all the steps, the way I would see it is the comms with the person who gives us 10 euros a month, there's the communication with our direct institutional donors, there's the active citizenship side, that's all a form of communication, the narrative, the message and story we give."* "

A point which emerged from the questionnaires, and which is not as evident in interviews is that although some people see communications as traversing organisations, four respondents described communications *"as an element of fundraising"* or *"as functions of fundraising and recruitment of volunteers"*, "*a driver of fundraising"* and *"linked with marketing and fundraising".*

Some people also refer to internal communications, with staff or members, between different sections of an organisation and management etc. While much of this is formal and it intersects with various complex organisational processes, information and data sharing and management systems at organisational and sector level, there are also those informal conversations, participants talk about, where people share ideas and stories.

Participants talk about ethical communications in terms of the images and messages that organisations use through various communications channels as well as in relation to how these are organised and how they are received. As such, ethical communications are seen to encompass the aims, motivations, values and ideals of organisational messaging alongside the representational practices used by NGDOs – around images, stories, captions, in DRTV ads etc. They see these as being diverse in terms of those they are communicating with, e.g., the same formats are not necessarily used for education purposes as for communicating with donors. Ruth-2 – summed this up:

> "you've different audiences, and one thing I've liked is one story and many voices, you can still have the one story you're trying to get across but the language you use and way you tell it and which way you come at it can be very different and that understanding coming through, but it still feels all the same, it still feels like X, it still feels like we're talking about the same issues".

Alongside these representational practices, participants mention decision-making processes around them, for example, who is involved, approval processes, photographic archiving etc, as well as the bigger picture values, culture and institutional relationships and practices which shape NGDO communication.

Changes in Representational Practices

Most participants, though not those who completed questionnaires, were asked to comment on whether or not they thought NGDO communications had changed or not and on the messages they wish to convey.

Overall Improvement But…

Overall, most participants see an improvement in the way in which NGDOs communicate GD in Ireland. While some focus on the sophistication of communication style and processes, and the support for NGDOs in Ireland, for most their responses around improvement focus on moving away from the 'worst forms' of stereotyped, 'extreme', 'explicit', 'melodramatic' or 'fly in the eye' communications to 'more intelligent and thoughtful', 'contextualised', *"better, more equal, more solidarity-based communication"* (Mary – 4). As such, according to Alex – 5, representations have improved from *"all war, war, war from the global South, you see there is no light, that everybody is suffering"*. Chloe – 1 – feels that communications have improved from being *"a bit old fashioned, or harking back to the '80s"*. She said that *"before, the appeals really honed in on the story of one child or you know showed close up images of the child, now the appeals contextualise the situation a lot more"*. In describing what that contextualisation looks like, Chloe explained that *"the woman mentioned in the case study, you see her in the surroundings, you can see exactly what's around her, you can see where she lives and the narrative in the document explains a lot more about Kenya, and the particular area, the context where she lives"*. Oscar – 1, on the other hand, feels that a lot of the structural causes and *"that a lot of our actions here are the cause of it"* (e.g., climate change or tax) still get lost in NGDO portrayal.

In discussing changes, it is interesting that different people saw a change over different periods. There was fairly widespread agreement, among those who mentioned it, that things had changed since the 1980s, with many people commenting that 'the flies in the eyes' trope is not as common now. At the same time, when the research was being carried out, there was a DRTV ad showing in Ireland, that many people referred to, which was showing a child with flies in their eyes. While some people were unaware of this, others saw it as a 'the worst extreme' of what NGDOs do, with some associating it with practice that NGDOs do when they can *"because they work in terms of fundraising"* (Victor-1). For Linda – 5, the ongoing use of those images, however exceptional they may be, represents *"incitement to hatred"*. While many talk of changes since the 1980s, others focus more recently on changes since 2013, 'in the last five years' and in the last 12 months, where *"the BLM movement has provoked conversations in every sector"* (Victor – 1).

Improvement Doesn't Go Far Enough

Another point which emerged strongly was that while participants identified improvements overall, many did not feel that they went far enough or that they were substantially evident to ordinary people. Alice – 1, from a fundraising point of view said that *"we've come very far from where we were and there's a really far way to go, there's loads to do as well"*. Hugh – 4, from a DE point of view explained that

> *"I would be a little bit disappointed still at what gets out there and how often it's said and some of the remarks and comments... I really thought that a lot of work around values and frames and the work that the Development Education Group within Dóchas did on it, I would have thought there would have been more improvement there. There has been some in fairness, but I think it's been very slow."*

Elizabeth – 5, summed up the difference between how people familiar with the sector view these changes and those outside it:

> *"when I wasn't in the industry or the sector I really did think we were over there saving Africa, we were doing the work because all the messaging, I mean it has changed quite a bit now but the messaging, the imagery, the calls for donations, they never spoke about how 90 percent of the organisation was Sierra Leonian or Liberian or Ghanian. It looked like we were over there doing all the work and making everything better and they weren't empowered to do it themselves. More now you definitely do see people talking themselves... I've seen local NGO workers and you see them at the top of the classroom talking about FGM or SGBV or whatever whereas I was growing up it always looked like we were doing all the work but I don't think it's strong enough to get the attention of my mother, I always use her as a barometer."*

Messages NGDOs Convey and What NGDOs are 'Doing Well'

Messages on NGDO Work

In the questionnaires, those who responded to the question asked about what messages they try to convey through their communications largely emphasised their main areas of work. From one development educator this is about

> *"encouraging critical thinking. We question assumptions underpinning development advocacy and policy work, we promote the importance of challenging neoliberalism and the growth paradigm to address fundamental development problems."* Another two people mentioned partnership with one describing their messages as *"solidarity with partner NGOs in global south"* and *"active citizenship."*

Where two questionnaire respondents specifically highlighted the importance of GD work including *"persons with disabilities, in partnership with them",* for example, another talked about the importance of conveying the message that *"climate injustice is the biggest issue",* and another about *"the status of women in the developing world, the importance of lifting communities out of poverty".* For those who see communications linked to fundraising, one person described communications as being *"largely used for marketing. We use stories from the field, targeted at potential donors, in the hope that that communication will inspire empathy, etc. and lead the donor to donate down the line."* Another describes the key message as *"that it works and that it is needed. We try to convey both need and impact. We also communicate on the under-lying causes of poverty and how Ireland can play a political role through legislation and policy."*

Important Principles – Dignity and Truth

Participants in interviews and focus group discussions introduced a range of principles which are important to them in talking about messages they convey. These were summed up by Oscar – 1 – in the principle *"do no harm"* and for Chloe – 1 in *"the litmus test of 'if it was you, how would you like to be portrayed?'"* While many talked about their messages in terms of their own work areas and their organisation's specific approach, like those who completed questionnaires, e.g., the importance of agricultural development, trade, hunger, the SDGs or human rights and gender, some principles and representational practices come to the fore that traverse different specific organisational priorities.

The principle identified most often by participants is that of portraying people with dignity. This is linked for some participants to human rights and/or respect, and for others, with agency, *"that they are working, they are doing business like anybody else… you can engage with them in equal terms"* (Steve – 4). Dignity is also linked to voice, i.e., *"that their voices would be heard"* (Alice – 1) or people *"telling their own stories"* (Alex – 5). Here we can see that notions of voice are interpreted differently with some viewing it as being about not distorting people's experiences and ensuring accurate representations of them while others view it as communications giving voice to people to 'tell their own stories'.

Because some participants feel that they are acting *"with a representative hat on"*, where *"I'm being their voice and communicating their message"* (Laura – 2), they have a sense that they have responsibilities. For some, it is *"conveying the reality of the situation… to communicate when things are really, really bad"* (Chloe – 1), for others it's about being *"true to their word… true to their messaging and true to the meaning of what they were saying"* (Laura – 2). In that case, Arthur – 2 explained that *"we use the people's real quotes, we don't attribute quotes they haven't given us, we don't use photography tricks… we only photograph people in their homes, in their reality"*. For Ruth – 2, this is about *"not making up stories, these are real people in real situations, in real need"*. Others talk in terms of 'telling people's stories' and more about creating a situation *"to allow our partners to tell their story in their words"* (Freja – 3).

Human Rights, Justice, Partnership and Solidarity

Prioritising the principle of human rights, Arthur – 1 linked this with ensuring that participants are not presented in *"an undignified manner, we want them to have agency and that dignity"*. The principles of justice, partnership solidarity also emerge in participants contributions, though not as strongly or as often as dignity and respect. At the same time as Hugh – 4 talked about the importance of solidarity, he explained that *"we don't want to be contributing to discussions that we're the centre of everything. We're part of things, that ecology"*. This overlaps with some participants' focus on NGDOs' *"responsibility to tell the full story. We have a responsibility to give really in depth, nuanced, accessible information which is not always easy to do"* (Elena – 4). Linda – 5 agreed. *"You have to bring that complete picture. You have to say what the governments are doing. There's no way an NGO is giving more to a country than the government of that country"*. Such comments open up questions about how reality, truth and 'real need' is understood.

In terms of balancing the type of messages they are portraying, for one person the tone is important: *"Sometimes it can be a little bit patronising… there is a need to highlight… the work that still needs to be done and to reflect the truth of the reality that people are experiencing"* (Laura – 2). For others, it is moving away from an 'us' and 'them' framing, showing equality and trying to *"interweave development and Irish issues"* (Martina – 1), or it's about being aware of and not crossing 'red line issues', for example *"showing images of serious injury or death"* (Arthur – 1).

Hope and Change

The principle of hope emerged, and for those who mentioned it, it is associated with 'inspirational messages', 'uplifting and inspiring' messages and conveying an understanding that things can change and that poverty, inequality and injustice are not givens but open to change (Elizabeth – 5). Chloe – 1 said *"we're trying to give out inspirational messages that show that things have changed and things have improved dramatically across the countries we work in, so positive, inspirational messages…. Within the messaging, there's a message of global solidarity, that we're all one global village so to speak."*

For some, mostly those involved in fundraising, the story of change is part of building the picture of the relevance of the organisation and the work involved. This contrasts to the emphasis on solidarity and partnership reflective of participants (above). For Laura – 2, for example, *"the stories would have to be informative, educational, uplifting and inspiring as well about the work we do in the field … we also want them to feel uplifted by that work and inspired to donate"*. Stories of change are also highly regarded, sometimes under the 'classic arc', where *"you show the problem first and then you can show the solution"* (Oscar – 1) or, as advocated by one person, where NGDOs focus on

what has changed rather than on the problem (Adrian – 2). This need to show need was mentioned by many, as Izzy – 3 put it,

> *"we're probably looking for images that have an inspiration element to them mainly, that show people… on the journey to getting out of poverty. It would only be in an emergency in a particular field where we would highlight real need or showing need would feature in our images. In our newsletters, it would be around showing people who have been impacted and are benefitting from support."*

Diverse Communications

The principle of diverse communications emerged with reference to *"moving away from the single story"* (Linda – 5) or the *"one child on the box"* (Arthur – 1) towards *"diversifying the range of ethnicities"* represented and *"a range of different stories… showing different issues"* (Arthur – 1). Similarly, for Mary – 4, there is an effort to *"try to be more diverse in our messages, more encompassing of different kinds of context, more really trying to hear from people who are closer to what is happening than us"*.

Section 2:
Ethical
Communications
in GD –
Representations,
Issues and
Tensions

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Ethical Communications in GD – Representations, Issues and Tensions

Existing Research

Concerns about GD communications have been around for many years and they have touched on many important issues. They have also reflected many different perspectives, critiques and debates. These concerns are of critical importance here because of the influence of GD communications in shaping understanding and attitudes towards GD, as well as behaviour towards people, especially those considered 'other'. Here, I introduce analyses of representations and stereotyping, post-colonial and post-development analysis of 'us' and 'them' binaries, identifying specific issues of concern, i.e., gender representations, representations in and around fundraising and humanitarianism, representations of children and issues around media and social media representations. Through them, the detrimental effects of colonial, paternalistic, charity-oriented, sensationalist and stereotyping representations on discrimination, racism and othering of all kinds come starkly into relief.

Representations

A number of different approaches have been applied to understanding the power of images and language and their effects, which help to throw light on different key issues when it comes to ethical communications. These include work based on representations and stereotyping, where the work of Stuart Hall (1997) has been particularly influential. Representations – the words used, images portrayed and the stories told, all help to shape our understanding of the world, the way we interpret and engage with it. While this is significant at the personal level, it is even more so at a societal level through representations and narratives in NGDO communications, in mainstream media and in social media, in advertising, in government policy and by organisations and corporations more broadly. Critiques discussed here, do not only relate to representations but to the representational practices associated with them and the organisational practices, cultures, assumptions, discourses and narratives underlying them.

Representations and Stereotyping

Some attention has been paid to research on GD representations in recent years. They reflect a range of influences but they have in common critiques of representations in terms of the unequal power relations they establish and support; concerns about binary relationships (Dogra, 2012; Nair, 2013; Hammett, 2019), and their effects, constructed between 'us' (NGDOs, donors, supporters of NGDOs) and 'them' (those experiencing poverty in the global South, those who are represented in NGDOs stories and images); and the relative lack of voice or consideration of those involved in these representations.

Among those who have made a significant contribution to analysis of GD communications in recent times is Nandita Dogra (2007, 2011, 2012), who draws on many influences including post-colonial analysis and feminist critique. Dogra's (2012) book examines in detail the significance of representation as a means of constructing reality as well as exhibiting it. While continuing to

represent global poverty as 'out there', she argues, NGDOs also try to make connections between 'us' and 'them' through advocacy and human rights appeals.

Stereotypes and Gender

Dogra (2007) explores different ways in which stereotypes and myths are perpetuated through NDGO representations. Drawing on her research on regular fundraising imagery of a UK-based NDGO, she argues that while "images show multiplicity of representations and varied 'developmental' themes, they also reveal an undercurrent with important ramifications for the discourse of Third World" (2007: 169). Most appeals show people in rural contexts and "urban settings and 'modernity' of any kind are uncommon… the historical context of colonialism/ imperialism too is largely absent … The images studied seem to raise the question of NGDOs' possible contribution to the making and institutionalisation of the existing 'myth' by their subtle but persistent depictions of a stereotyped 'agrarian' Third World made up only of farmers. These are controversial and recurrent questions of ideologies, power balance and relationships with Southern clients and partners that need to be addressed constantly" (ibid).

Analysis of stereotypes is also evident with regard to representations of women and children in GD. Analysing GD policy, Mary Corbett (2014), for example, analyses the constructions of girls and girlhood in development discourse. She identifies two discursive constructions which readily appear in development messages concerning girls' education and HIV infection. These constructions are girls as 'victim' (emphasising a lack of agency and gender inequity) and girls as 'heroines' (depicting the potential of girls to contribute to society. While maintaining that there is some truth in these constructions, by relying on them in a simplistic manner, she argues, more nuanced and complex understandings of girls' experience are missed and, significantly, have negative implications for development.

In her discussion of gendered representations among NGDOs, Dogra (2014) identifies mixed representations or, as she puts it, 'the mixed metaphor of 'Third World Woman''. Her analysis shows an overwhelmingly high number of women and children in the photographs and messages, to the almost exclusion of men. Women are typically portrayed as 'traditional', 'needy' and 'deserving'. Men, when they are mentioned, tend to be associated with violence or corruption, thereby becoming a further 'problem' for women.

Dogra (2011) draws on Richard Dyer's term 'typification', which he uses for analysing stereotyping in gay portrayals, and she argues that such typifications apply to representations of women in GD. These "'visually recognisable images and self-presentations' … have a clear advantage of being 'immediate and economical' and establishing the character 'literally at first glance'… MW [Majority World] women are often typified as 'good' and occasionally as 'religious' that resonate with the development discourse of MW women as 'traditional'", she argues (2011: 336). She (2011) argues that the dominant representations of women in these NGDO messages continue to be those of mothers and nurturers, whose values are hard work and caring for others, recipients who are worthy of aid – clearly a strategy to raise funds from sources in the Global North. Setting women as 'good' against the 'bad' men continues the colonial perception of women as 'victims' and 'backward' compared to women in the developed world. When women are portrayed as self-sufficient and successful (for example in small-scale farming), she argues, such messages can portray the neoliberal agenda of using women for instrumental purposes, which exhibits seeming success stories of development, but which often merely increases the work loads of women. This elicits "conflicting and contradictory implications that may empower women but exacerbate neoliberal understandings of development that can undermine gender equality".

Dogra concludes with a scathing critique of NGDO portrayals of Majority World women, arguing that "NGDOs remain complicit with colonial ways of seeing in their messages. Portraying non- Western women as victims, whether in themselves or in contrast to Western women, reproduces the colonial perception of the backwardness of the MW and the advancement of the DW (developed world), while sidestepping the deep connected histories that shape current global inequalities" (2011: 346).

Stereotypes and Binaries

Criticisms of GD communications as not only repeating but contributing to stereotypes has been evident for many years, but questions remain about how stereotypes become established, why they are difficult to remove and why they are so important to address in the first place. What can be done about them?

How Stereotypes Work

Stuart Hall provides some particularly useful insights into understanding stereotyping, what stereotypes represent and how they work to limit perspectives, control behaviour and shape relationships. He argues (1997) that stereotyping works as a representational practice through essentialising – assuming that everyone in a group is the same; reductionism – reducing people in a group to particular characteristics, often ones that are considered negative, but not always so; naturalisation – assuming that these characteristics are 'natural' for people in that group, i.e., they can't be changed; and through binary oppositions which fix differences– where one group are compared to another and viewed as inferior in relation to them. He goes on to explain that stereotyping "deploys a strategy of 'splitting' [which] divides the normal and the acceptable from the abnormal and the unacceptable", what 'belongs' and what does not is 'Other', between 'insiders' and 'outsiders', Us and Them" (ibid). Hall's third point in relation to stereotyping is that stereotyping tends to occur where there are "gross inequalities of power" (1997: 258).

Through stereotyping, Hall argues, the ruling group or those in power, establish what's normal and fashion the world according to their world view, their understanding of what's normal or what they take for granted. We do not necessarily do this intentionally, nor does it mean that stereotypes cannot be challenged or replaced with other ways of representing the world. For Hall, as they reflect a form of hegemonic power, meaning can never be finally fixed and stereotypes can be "challenged, contested and changed" (1997: 269).

The process of establishing binaries through GD representations has also been analysed as reflecting the gaze of colonialism or developmentalism. GD binaries tend to frame development relationships in terms of 'us' and 'them' and often on the basis of North/South superiority/inferiority and tranactionalism (or related charity tropes), associated with the needs of 'the other' for external intervention or aid. The treatment of representations of childhood and the framing analysis of Darnton and Kirk (2011), Murphy (2014) (below) help to illustrate some of the dynamics involved here.

Representing Children in GD

An early article in this genre is Kate Manzo's oft-cited (2008) 'Imaging Humanitarianism: NGO Identity and the Iconography of Childhood', which still has significance for many NGDO representations today. There, Manzo argues that "images of children are useful for NGOs in reinforcing the legitimacy of their 'emergency' interventions as well as the very idea of development

itself. But the dominant iconography is also inherently paradoxical, as the child image can be read as both a colonial metaphor for the majority world and as a signifier of humanitarian identity" (2008: 632). With reference to guidelines for improved practice around the representation of children, she highlights the important critique that "any image of a lone baby (with its absences and cultural iconography of childhood) can always be read as an infantilising spatial metaphor of the majority world—whether image guidelines are followed or not. But a main point of such guidelines is to make colonial parent–child metaphors of development more difficult" (2008: 651). In so doing, she highlights the important points about images that they can serve many functions for NGDOs, especially to promote their humanitarian identity, and they can be interpreted very differently and often contrary to the intentions of those using them.

Manzo's concluding paragraph is worth quoting in detail as it presents significant challenges to those NGDOs who rely in the use of images of children in their communications. Even when accompanied by text which advocates solidarity, agency and equality, Manzo argues,

> "the iconography of childhood also works for NGOs in the same way that missionary iconography worked in the colonial age. It reinforces an impression of both institutional efficacy and the power to act in loco parentis by tapping into cultural associations of childhood with dependence, innocence, and the need for protection and care. What makes these images politically interesting is their paradoxical nature. They can be read as both signifiers and metaphors: the same image (such as the much critiqued "starving baby" image still featured in many emergency appeals) can faithfully represent a shared value such as the principle of humanity whilst problematically representing one part of the world as infantile, helpless, and inferior. Whether conventional child images can ever effectively serve NGO causes such as development education and debt cancellation depends in part on the impressions given by the surrounding text, messages, and captions. What seems certain is that such images will never be abandoned entirely as long as they help to legitimise the foundational idea of all western-based development— that the global south is inevitably better off with ongoing interventions (in the name of development) than it would be without them" (2008: 652).

Marta Zarzycka's (2015) article on the use of images by the NGDO, 'Save the Children', deals with the ubiquitous use of images of the child as the 'face of need' trope and argues that "reducing complex issues to binaries consisting of good and evil, guilt and innocence, war and peace, images of children take emotional advantage of their audiences while serving the institutional interests of governments, NGOs, media corporations, and political parties" (2015: 30). Analysing the main image used in a particular campaign of a child on her own, she argues that through images like that, codes of conduct, organisational brand objectives and impact strategies come together. In this case, though the image complies with the organisation's ethical code in showing the child with dignity, she is pictured alone. "No specific story is provided here (name, age, country of origin, economic and parental context). Alone, without markers of culture, history, or community, she represents humanity in need rather than a community affected by specific circumstances" (2015: 34).

Janice Nathanson's (2013) article 'The Pornography of Poverty', offers a strong and largely negative critique of the use of images by three child sponsorship organisations in Canada over a six year period between 2005 and 2011. Though Nathanson shows that things have changed in those six years, there are still significant problems with the ways in which organisations use images of children, she argues, e.g., NGDOs still use images of children alone or, often, with their mothers, portrayed with limited context.

Framing and GD Communications

In their 'Finding Frames' reports, Darnton and Kirk (2011) and Murphy (2014) explore frames in NGDO communications, highlighting the ubiquity of transaction frames and of representations of women and children across a range of NGDOs. Darnton and Kirk (2011) distinguish between 'surface frames' – the frames, concepts, terms or phrases which organise what is said – and 'deep frames' – the assumptions, beliefs or ideologies related to what is said. They argue that "deep frames set the subject in a moral context, or ground it within a worldview…. [they] are important as they can activate, and reinforce, particular values" (2011: 75). Rejecting frames based on the values of individualised rationality, utility, hierarchical power relations and self-interest, they favour those which support empathy and cooperation, non-hierarchical social relations, sharing, participatory democracy and "horizontal development" (2011: 85). As such, they identify a range of what they call 'negative' frames which are evident in NGDO representations and which, they argue, should be replaced by alternative, more 'positive' ones. These are:

'Negative' Frames	Alternative, 'Positive' Frames
Charity	Justice; Fairness
Charities	Movements; NGOs
Aid	Mutual Support; Partnership
Development	Well-being; Freedom; Responsibility
Corruption; Aid Effectiveness	Good/Bad Governance; Fraud
Communications	Conversations
Campaigns	Engagements; Dialogues

[Source: Darnton and Kirk, 2011: 94)

Murphy (2014), drawing on Darnton and Kirk's (2011) 'Finding Frames' research, was commissioned by Dóchas to undertake a content analysis of chosen communications by Irish NGDOs (including websites, annual reports, twitter and Instagram communications). She finds that frames such as 'charity', 'helping the poor' and 'poverty' are often used and contribute heavily in situating people from the Global South in constant need of 'saving'. This frame continues to highlight the discourse that people from the Global North are 'superior', which undermines the aims of the NGDOs of equality and justice. Other frames discovered are the overuse of images of "Poster Children" and women. The latter images tend to undermine the agency of women in the Global South, depicting them as needy and dependent on instructions from the Global North on how to manage their lives. She also finds that donating money (a transaction frame) was the key message conveyed about how to change the lives of people living in poverty, rather than working in partnership.

The main findings of Murphy's (2014) research are summarised in Box 2.

In addition to a focus on stereotypes, from a geographical perspective, Hammett (2019) is also critical of simplistic 'us' and 'them' constructions which assume that development happens to people 'out there' who are needy. He focuses on the power imbalances that underpin NGDO representations, arguing that NGDOs need to move away from understandings of development as charity where people in the global South are regarded as aid recipients with little agency, towards a social justice approach to development which addresses the structural and interconnected dimensions of global inequalities.

Box 1: Finding Irish Frames, Caroline Murphy (2014)

In this box, some key points from Caroline Murphy's (2014) research are presented. Her full report, which was commissioned by Dóchas, can be found online at the following link: https://developmenteducation.ie/resource/finding-irish-frames-exploring-how-irish-ngos-communicate-with-the-public/

"The Surface Frames that were found to dominate this analysis included: charity, help the poor and poverty, which are all linked to the triggering of the moral order deep frame "(2014: 52). She explains that this is in tandem with Darton and Kirk's analysis and that "these tap into a notion that situates people from developing countries in constant need of saving, and lacking the ability to be able to break the cycle of poverty. This indeed raises cause for concern about how NGOs are communicating with the public. The overriding triggering of the moral order deep frame only serves to emphasise a divide between rich and poor, black and white, or superior and inferior. Consequently, the 'us and them' mentality is reinforced, and perhaps this can be directly linked to the low levels of public knowledge and increasing scepticism around aid impact that is apparent in the recent research studies conducted in Ireland" (2014: 52).

Referring to the possibility that frames tap into Darton and Kirk's 'Live Aid Legacy', she argues that "it seems vital that Irish NGOs consider if the very frames employed in their communications are fuelling a public perception that perpetuates development as a never ending cycle of giving within a two-world concept, where one side of the world cannot seem to work their way out of poverty despite all the donations" (2014: 52).

In terms of 'communicating progress', her research identifies that "there was some evidence to indicate that NGOs were also communicating progress, or 'good news' stories throughout some of the documents. However, this evidence largely emerged from annual reports. .... The materials intended for the wider public, however, were less likely to emphasise impact and partnership, and more likely to depict a beneficiary as solely reliant on money from the potential supporter to save them from their plight. On the other hand, a significant amount of data emerged from social media which was categorised under progress information (2014: 53)" but she acknowledges that her data would need more rigorous investigation and substantiation.

Overall, with regard to values supported through communications, she argues, "the overriding frames found in this study tap into values that lie within self-enhancement, which in turn work in detriment to self-transcendence values, which Darnton and Kirk (2011) state are the essential values required for support for development and global solidarity" (2014: 53).

A second key finding is that "Images of Poster Children are dominating communication materials" (2014: 54)

Box 1: Finding Irish Frames, Caroline Murphy (2014) – *contd*

A third key finding is that "Images of women, either with children or working in fields, are also dominant in the materials. This was significant enough for the researcher to assign a new category entitled 'Gender Frame'" (2014: 55 or 2014: 56). In light of research highlighting the stereotypical portrayal of women in development discourses, she "calls for NGOs to re-consider how they portray women, as not only does it reduce all women from developing countries to a specific role, it also 'impedes the ability of African women and women of African descent in Ireland to move beyond the stereotypes created in the charity campaign images' (Young, 2012, p33). Also, it is considered significant that images of men were scarce in these findings. Thus, it is argued that such findings highlight how the NGO sector should consider the wider implications around how stories depicting both men and women from the global south are constructed and communicated to the public" (2014: 55 or 2014: 56).

A fourth key finding is that "Transaction is the dominant call to action " (2014: 55 or 2014: 56). "throughout the majority of artifact analyses, the overriding message was, that by donating money, the potential donor could help change the lives of the 'world's poorest'. Women and children were predominantly portrayed as the victims, and it was considered significant that the majority of links on the websites depicted images of children alongside the calls for transactions. A considerable amount of data also emerged from social media that simply tweeted or posted calls for transactions by providing links to the website fundraising initiatives" (2014: 55 or 2014: 56). These transaction calls were in contrast to calls for development education action which were at a minimum.

Her final main finding is that " 'Finding Deeper Frames' emerged as an unexpected collapsed theme" (2014: 57). This means that a lot more critical analysis of frames is required which identifies the perspective driving them. As she says, analysis of frames "cannot be simply seen as a tick box exercise between positive and negative, or good and bad. Rather, as the above finding indicates, it must firstly involve a critical analysis by applying other underpinning theories. It must ask questions around if such programmes might be based on a modernisation framework that is ultimately driven by a Western agenda, or if these can be considered to be truly 'focusing attention on the need for structural change, based on a reformulation of the global North's political-economic relationship with so-called developing nations' (Bryan, 2008, p75)" (2014: 57).

In terms of recommendations, she opens with calls for more research around frames, around the effect of them on public perceptions of development, around how gender is constructed and the portrayal of children and their implications on bias and rights and on deeper frames.

Her recommendations for practice are quoted in full here – 2014: 58/59 – "A self-assessment tool should be devised by [Dóchas] as a means for organisations to identify the dominant frames in their materials. The tool should also aim to help organisations recognise opportunities for utilising more 'positive' frames and values to tell progress stories that promote a genuine sense of agency in the developing world

- The sector should critically reflect on the dominant use of frames connected to the moral order deep frame and self-enhancement values, and how these might be a factor in the decreasing levels of public support for development interventions

- The sector should consider further how social media might be utilised to engage the public in development issues and actions through the use of frames more conducive to self-transcendence values

Box 1: Finding Irish Frames, Caroline Murphy (2014) – *contd*

- The sector should rethink how gender is constructed in development narratives, including the lack of male representation in public communications. The human rights implications should be carefully considered in relation to the creation of a gender-stereotype. It is suggested that this is explored further in collaboration with the African and Caribbean Support Organisation Northern Ireland (ACSONI) who has already undertaken work around this issue. It is also recommended that this is applied to how children are portrayed in development stories

- Overall, DEG should consider the wider role of development education in driving forward all of the above practice recommendations. It should further consider how it can open up a debate in the Irish NGO sector around creating synergies between development education, fundraising and marketing departments in order to work towards a frames shift in public communication material"

Murphy concludes that "reframing communication is a difficult task, and no one organisation or group of organisations can claim to have an authority. Further, no one research investigation, or even a series of investigations, can provide answers as to how best go about applying frames to increase public knowledge and understanding of development issues. What research and organisations can do, however, is work towards gaining a better understanding of how the sector has been employing frames, and reflect critically upon how these frames might be at odds with gaining longer term public support for global justice and development initiatives" (2014: 59).

Addressing Stereotypes

Hall introduces different ways in which stereotypes are challenged at the level of representations, i.e., through text, images and film. Using the example of racial stereotypes, the first is to 'reverse stereotypes'. As applied to GD representations, this might be to replace the stereotype of the 'flies in the eyes' image of an African child with one of a smiling African child, for example. Because stereotypes represent deeper 'power/knowledge' systems, Hall explains that "to reverse the stereotype is not necessarily to overturn it or subvert it. Escaping the grip of one stereotypical extreme… may simply mean being trapped in its stereotypical 'other'… This may be an advance… and it certainly is a welcome change. But it has not escaped the contradictions of the binary structure of racial stereotyping" (Hall, 1997: 272). In that case, the African or African child is still the 'Other', still subject to the outsider's gaze, infantalising (Manzo, 2008) and likely framed by a transaction relationship (Darnton and Kirk, 2011).

The second strategy Hall discusses is the replacement of negative representations with positive ones. This type of strategy is associated with celebrations such as 'Africa Day', the Africa Centre's 'Africa Also Smiles' campaign and the publication by Dóchas of the 'World's Best News', all promoted in the late 2000s in Ireland. While such an approach can signal a celebration of diversity and give voice to those who have been silenced or invisible in dominant representations, Hall argues that "adding positive images to the largely negative repertoire of the dominant regime of representation increases the diversity of the ways in which 'being black' is represented, but does not necessarily displace the negative. The strategy challenges the binaries – but it does not undermine them" (1997: 274).

His third strategy for countering stereotypes is located "within the complexities and ambivalences of representation itself, and tries to contest it from within. It is more concerned with the forms of racial representation than with introducing a new content. It accepts and works with the shifting, unstable character of meaning, and enters, as it were, into a struggle over representation, while acknowledging that, since meaning can never be finally fixed, there can never be any final victories" (1997: 274). An example of this might be the RadiAid 'Africa for Norway' song (2012) which challenged the stereotypes associated with the Band Aid one. Subverting stereotypes is likely to be most effective when it also involves making efforts to be creative, to present alternative versions of stories, and to engage different knowledges (E-Tick, 2020).

Challenging stereotypes, therefore, needs to happen at a number of levels. In addition to identifying problems with representations, it is also important to address and 'subvert' representational practices. Some of these issues have been identified in the literature with reference to analysis of the use of images and photographs as well as with regard to emphasising the experience of those who are 'in the pictures' (Warrington and Crombie, 2017).

Issues re: photographs and Images

There is some emphasis in existing research on GD representations on the design, production, creation and use of images, photography and video. This work includes broad concerns around power relations, e.g., in the processes surrounding production, in relation to consent, collection, archiving and working with agents. It also, increasingly (as with Warrington and Crombie's 2017 research), includes considerations around those who contribute to these images, especially with regard to ensuring that their perspectives and voices count, in terms of the images produced and used, and in research around them. I introduce a sample of this research here.

Alpa Dhanani (2019) draws on postcolonial theory to analyse the visual images that NGDOs use in their annual reports to understand how they represent and construct identities about themselves and their different constituents. Using a Critical Discourse Analysis approach, she offers an interesting and comprehensive analysis of a wide range of annual reports from NDGOs between 2010 – 2013, which show hundreds of images. Though many images reflect the dignity, human rights and agency of those with whom NGDOs work, she concludes overall that

> "'images are used principally to support organisations' accounting narratives to showcase and share their successes and achievements to create identities as agents of change. Paradoxically, however, these images possibly naively and unintentionally depict Southern constituents, for whom they exist, in a negative way, and also contradict the ideals of emancipation and liberation of critical accounting research. Three possible and related explanations for such representations include (i) organisational endeavours to pitch themselves as the knowledgeable and able changemakers; (ii) organisational attempts to emphasise the invaluable role that Northern donors and supporters play in enabling international development and create shared values that ensure continued public commitment to the organisations; and (iii) reflections of the cultures, values systems and ways of operating in these organisation" (2019: 29).

As such, she argues that "the NGO sector itself needs to recognise and seek to remedy the contradictions between the communicative practices of its member organisations and the ethos and values that underlie these organisations" (2019: 29).

Not Just 'Positive' Images

Dogra's work (2007), as introduced above, highlights the complexity and contradictions in NGDOs' use of images. She argues, similar to Hall (1997) above that viewing images as 'positive' or 'negative' is an oversimplification which hides nuances and power relations going on between the different actors. She identifies the co-existence of negativism and positivism in NGDOs' use of images, an ambivalence, she suggests, that reflects the complex nature of NGDOs as organisations (2007). As NGDOs have to make very challenging decisions about the ways in which they use images, she argues that they have diverse axes to address: fundraising versus education/ advocacy; charity versus development and short-term gains versus long-term aims.

She goes on to suggest that "while it is crucial to criticise extreme images of negativity, still prevalent in disaster images, the generalisation across all NGO imagery and the conscious attempts by NGDOs to avoid 'negative' imagery seems to have resulted in the 'dogma' of 'positive' imagery in regular or developmental appeals … This pressure to show only 'positive' imagery may have narrowed the range of choices in imagery available to NGDOs. This may partly account for the greater use of photos of children since the 1990s and occasional recycling of 'safe' imagery with similar popular themes like profiling the donors" (2007: 168). For her, "'positive' imagery is a lazy way out and lets NGDOs ignore messy questions of power and ideology. An image which shows the complexity and context of development as well as educates/advocates is also a difficult challenge" (ibid). The tendency for NGDOs to address 'negative' stereotypes with 'positive' ones, e.g., of the happy, smiling African child, is a common one across many NGDOs. Its weakness as a strategy for addressing stereotyped representations is evident here, especially when its effect is to reinforce infantilisation (Manzo, 2008) and to justify paternalistic responses to complex challenges.

Similarly, Cameron and Kwiecien's (2021) research shows that NGDOs tend to associate problematic representations and unethical communications with the worst forms of stereotyping and negative imagery. They argue that NGDOs need to come to terms with the ambivalence and subtlety of contemporary practices so that they can meaningful address them. Rather than assuming that everything is ok when organisations do not use 'the worst images', their work reinforces the importance of addressing representations with a more nuanced understanding of their effects in different contexts.

Highlighting the Perspectives of 'The People in the Pictures'

Siobhan Warrington and Jess Crombie's 'Save the Children' research (2017) addresses representations in GD from a different perspective, emphasising the experience of those 'in the pictures'. In it, they highlight the importance of presenting contributors with dignity and ensuring their central role in image-making processes. The stated purpose of this research was hearing from contributors (the people featured in the images) (53), non-contributors (130) and staff (19) in the UK, Jordan, Bangladesh what Save the Children was doing well and what it could improve on in relation to image making.

Beyond that, this research highlights a number of important points for analysis of ethical communications and with regard to the role of those involved in development content in these communications. In moving beyond an analysis of representations to representational practices, they explain that "debates about representations of global poverty and images of suffering have been going on for many years, yet the voices of the people featured in the images – the contributors – have been notably absent. There has been a tendency to consider and judge the image alone,

rather than recognise it as the result of a process involving multiple stakeholders, one of whom is the person in the image" (2017: vii). They argue that

> "discussions about human dignity have long focused on the image itself, with much of what is considered 'famine' imagery, such as images of children suffering from malnutrition, being regarded as undignified. While it is important to consider different ways of visually representing suffering, we must not rely on this to resolve the dignity problem. Instead, the site for addressing dignity must move beyond the image to the image-making process and towards recognition of the contributor as a stakeholder in that process. For contributors, having a choice in how they are represented and a clear understanding of the purpose and value of sharing their image and story is dignified. It is this notion of dignity which has informed, and is reinforced by, this research" (2017: vii).

Even though contributors to the research understood "the need to use images of suffering to support fundraising… [they] expressed preferences for balance in portrayal [and] preferred the content in which contributors spoke for themselves" (2017: x). In light of these and other findings, recommendations included the need to "invest in more collaborative content" (ibid), ensure a duty of care during the image-making process and improve its procedures for all stakeholders around consent. This sees consent as a multi-stage process, two way and involving a range of communication channels, e.g., to allow for withdrawal of consent or child-friendly consent mechanisms. In terms of the process of image making and broader content creation, the emphasis in this report is on image making as a process involving a range of stakeholders, including contributors. With that in mind, it emphasises the potential participatory and inclusive nature of this process, highlighting how important good experiences of the image-making process are to contributors. This involves ensuring that a range of responsibilities are fulfilled, including clear communication about the purpose of the image, responsibilities to those who are vulnerable and responsibility for follow-up and feedback (Warrington with Crombie, 2017). Their final recommendation is that organisations ensure that human dignity is upheld in the image-making process, not just in the image itself: "addressing dignity must involve consideration of how the contributor feels about their portrayal and offering them genuine respect and agency in the process of image making. For contributors, having a choice in how they are represented and coming away from the image-making process with a clear understanding of the purpose and value of their contribution is dignified. For contributors, dignity involves listening, voice and choice" (2017: 71).

The Effects of Stereotyping on Racism, Equality and Diversity

RadiAid Research

David Girling's research (2018) is a study of visual communication in six African countries. Setting out to understand what people in the global South think about the images portrayed in a series of NGDO aid campaigns, it draws on qualitative research with seventy-four participants in twelve focus groups. As outlined on the RadiAid website (https://www.radiaid.com/aid-recipients-call-for-more-dignity-and-diversity), key findings from the study include:

- There is a need for aid communication to show more diversity in terms of age and race.

- Respondents acknowledge that aid communication is complex, with no single solution.

- It is important that respect and dignity is preserved in the portrayal of people in aid communication.

- The majority of respondents thought the images in adverts offer an accurate representation of the situation in Africa.

The frequent portrayal of Africa as a continent in need prompted sadness among the respondents in the study, which was carried out in collaboration with the University of East Anglia (UEA) in the UK.

Girling (2018) outlines that these campaigns often depict black children in need, and several of the respondents wished that these stories could be complemented by showing children of other colors or backgrounds, or black doctors, professors or aid workers. They would like to see portrayals of people with agency in their own situations and results of their accomplishments: "Why not try to create a sense of hope or provide inspiration to the viewer, instead of primarily provoking feelings of despair? The participants in this study are quite adamant about their wish for more diverse portrayals of their continent", says Beathe Øgård, president of The Norwegian Students' and Academics' International Assistance Fund (SAIH).

Several of the findings support issues Radi-Aid has been highlighting through its campaign since 2012, Girling (2018) argues, i.e., "the typical image INGOs show of Africa is often a demeaning and dehumanising one, and the humans portrayed are more than what these images offer. Aid communication still needs to move away from presenting the single story."

Representations and Diaspora Communities

In Edward Ademoulu's recent article on humanitarian representations, he acknowledges the critical significance of research which highlights "the influential role that representations of humanitarianism have had on how different, largely western-situated communities comprehend, perceive and engage with people and places of the global South and especially, Africa" (2021: 204). At the same time, he argues, there is a tendency "to present white hegemonic interpretations of British audiences of NGO representations" (ibid). Because "humanitarian representations – imbued with 'racialised knowledge' and regime of whiteness – reflect and reproduce dominant asymmetrical power/knowledge relationships and structural oppressions of racial inequality" (2021: 205), he argues that it is important to understand how African diaspora audiences are affected by these representations, how they perceive them and how, in this case, "Nigerian identities are implicated, (re)constituted and strategically negotiated in relation to humanitarian representations which depict their continent and/or country of origin" (2021: 205).

He highlights paradoxes associated with these identities and complex anxieties, which are amplified by media and humanitarian representations, and which partly inspire this forging of new, preferential and ambivalent diaspora identities" (2021: 214/215). This work is of real significance in not only breaking down homogenous understandings of 'audiences' of NGDO representations, it also shows the importance of understanding the complex effects of such representations on diaspora communities. As Ademoulu shows in relation to his case with Nigerian diaspora, there is no one single response but responses are framed nonetheless in the context of dealing with the racialised identities, colonialism and white supremacy evident in NGDO humanitarian representations.

Representations and Humanitarianism – Tensions re: Fundraising and Communicating Complexity

As indicated in the work of Dogra (2012) and Ademoulu (2021), discussed above, issues surrounding representations of and in relation to humanitarianism are often extremely complex and they exacerbate some of the tensions already in place in relation to GD communications. Lina Dencik and Stuart Allan (2017) focus in particular on humanitarian photography and on the relationships between NGDOs and photojournalists in its development. Examining the difficult choices that often have to be made by NGDO staff when using photographs for their fundraising or promotional material, they refer to the oft-cited tension between fundraising activities and ethical photography representations, arguing that it takes on a particular form in "times of crises". Their research highlights the view among NGDO staff of the importance of timely, engaging images which move publics to donate in the face of these crises. For them, humanitarian photography uses "images of suffering, including extreme suffering, to enhance sympathy, empathy and a sense of responsibility or guilt in its viewers" (Dencik and Allan, 2017: 1187). Though it continues to change, they argue, there's a tendency for NGDOs to use photography in fundraising which triggers emotional responses to connect people to distant realities and to engage them with issues miles away.

Dealing with Tensions

A number of other articles or reports focus on communications in and around humanitarian contexts. David Nolan and Akina Mikami (2012) argue, for example, that there is an unhelpful dichotomy in much of the academic literature on the topic between the ethical ideal of humanitarianism and the practical realities involved. For them, this idealising of humanitarianism is ahistorical and it limits critical engagement at a deeper level with the challenges involved. For NGDOs to deal with these real and difficult challenges and the tensions between ethics and practice, Nolan and Mikami argue that they need to be more self-reflexive about the way that they can potentially contribute to a 'politics of suffering', through various factors such as institutional practices, socio-political relations, marketing strategies and competing with other INGOs.

Shani Orgad's work (2013, 2015 and 2017) focuses in particular on humanitarian organisations' communications. In the first of these articles, where she regards NGDOs as being involved in "the visual politics of solidarity", she argues that "NGOs' visual production is an area of conflict, negotiation and compromise, and … for the crucial need for attention to organizational politics in the production of visual representations of distant suffering in order to uncover diverse and competing motivations, and the forces driving current humanitarian and development communications" (2013: 295). In exploring intra-organisational struggle, she outlines tensions around competing needs and expectations between fundraising and campaign staff, i.e., over the temporal orientation of these different groups, over their sense of what's important or urgent and over positive and negative portrayal. In sum, she says, "the discursive–visual tension between the 'negative' and 'positive' paradigms of representations is bound up closely with and reproduces the organizational tension between fundraising/marketing and communications/ campaigns/advocacy departments, and their competing logics" (2013: 302).

Orgad argues that managers expend considerable energy and time in trying to balance out these logics. To this end, these challenges and tensions need to be understood so that organisations can deal with the problems associated with humanitarian communications in a meaningful way. This also applies to inter-organisational areas of struggle which affect humanitarian communications. There, in her research with NGDO professionals, she identifies "two contradictory tendencies in

this context: convergence, cohesiveness, collective identity and competition, distinction and divergence" (2013: 304). Professionals talk of the desire for all organisations to converge around ethical communications, with the sense that they are part of a shared 'community', with similar approaches or frames around their work. Paradoxically, though not surprisingly, in that context, some fundraising professionals in Orgad's research talk about the need to create a distinct identity for their organisation so that they can compete for support and funds.

The following extract gives some insight into the tensions she identifies:

> "Most professionals, especially from communications, campaigns and advocacy departments, from… NGOs, see their organizations' approach of depicting distant others as progressive and ethical, having learnt the lesson of the 'flies-in-the-eyes' imagery that dominated past communications. They criticize those NGOs that take the 'easy route' to tugging at the heartstrings (a communications manager) and succumb to the 'fundraising logic' (a campaigns manager). Several communications managers and campaigns managers expressed anger – even disgust – at the 'shitload of backsliding' and the 'going backwards' (the words of one communications manager), referring to the use by some NGOs of stereotypical, dehumanizing depictions of starving babies and helpless victims" (2013: 306).

Finally, Orgad highlights a range of other important issues of considerations in terms of the messy politics of humanitarian representations: the ways in which people arguing competing perspectives and practices often all appeal to 'truth-telling' as the basis for their argument;

> "the ways in which organizational histories shape and inform the positions that organizations take towards visual representation of suffering and development; the influence of NGOs' interactions with external producers, such as advertising agencies involved in the production of imagery and the media; the impact of stakeholders, such as NGOs' major funders, on the politics of NGOs' visual representations; and the influence of government pressure on NGOs to demonstrate 'impact' in a work culture increasingly driven by data and auditing, and public scrutiny, criticism and public distrust of NGOs" (2013: 311).

Obscuring Oppression and Exploitation

In her later articles, Orgad also draws on interviews with NGDO personnel (the subjects of her earlier article) to identify shifts in the manner in which people in the Global South are represented. Arguing that there has been a general shift from negative to positive images, she also highlights that there has been a move away from focusing on solidarity with vulnerable, distant 'others' to focusing on 'us' in the Global North and how 'we' feel and experience. Her chapter on humanitarian organisations' strategies for communicating difference shows that NGDOs messages "rely heavily on symbolically representing 'the other'—victims of atrocities, natural disasters and human rights abuses, and children and women in the global South—to elicit care, compassion, and action from audiences primarily in the global North" (2015: 117).

As such, Orgad examines four strategies employed by NGDOs in their planning and production of communications of international development, humanitarian aid, and human rights abuses, namely underlining, celebrating, mitigating, and erasing difference. Though these are often cast as responses to earlier critiques of NGDO representations, she highlights that the strategies often emphasize Western perspectives without recognising difference or its irreducibility or to take account of how 'the other' wants to express themselves (2015). A second criticism she identifies is that

"in all four strategies of communicating difference there is limited problematization of the current global order. Acutely aware of the colonial baggage and other criticisms of their representation practices on the one hand, and under enormous pressures to raise funds on the other, practitioners admitted that the communications they produce seek to create a sense among their UK audiences of 'gaining' something from caring and acting about distant others… The contemporary marketing-driven, competitive, mediated environment, and the immense pressure on and scrutiny of NGOs internally and by the UK government and media, the public and global actors (Orgad, 2013), seem to have pushed NGOs to stress in their communications reassurance, comfort, and sustenance rather than disruption of the existing social order. Representations of oppression and exploitation that potentially might be disturbing to spectators are consequently being obscured" (2015).

Summary of Existing Research

The discussion of existing research around representations, discourses and framing in GD communications highlights that ethical communications is not about replacing one stereotype with another or positive images for negative ones. Representations are complex and they have complex effects. Those in NGDOs, therefore, need to understand the effect of their use of images and messages, of what they are doing or saying, not doing or not saying, along with the assumptions which underlie their representations and how different people are likely to interpret them.

Significant research is ongoing in the area of analysis of representations and, as shown here, NGDO representations are often ambiguous, contradictory and paradoxical. Thus, representations of and in humanitarianism can exacerbate existing challenges around stereotyping, gender, transactional frames and denial of coloniality and global power relations. This is driven by pressures around fundraising, the urgency associated with NGDO communications around them, in the push to connect distant publics emotionally and to engage them in donations. NGDOs need to understand and address these tensions, and to critically reflect on the effects of such representations on their own values, missions and work, as well as more broadly on racism and on the types of global relationships they construct. Research participant views on these issues with reference to GD communications among NGDOs in Ireland are discussed below.

Participant Research Findings

General Areas for Improvement

Many points of critique emerge from the research from people working across NGDOs and outside of them related to the points discussed above and others. These include points about representing context and complexity; stereotyping; agency, voice and 'us' and 'them' binaries; fundraising and the use of images and DRTV ads; and racism, equality and diversity. Though representations of gender, and of women in particular, have been the subject of significant research in the past, and a major finding of Caroline Murphy's research (2014) highlights the prevalence of women in NGDO frames in Ireland, this issue did not emerge as significant among participants in this research.

Before exploring these points, I introduce findings from questionnaires where participants were asked what they think NGDOs are doing well in terms of their communications and what they could improve upon. In terms of improvement, one person felt that

> **"** *"we are doing well in terms of communicating nuance and not sticking to traditional stereotypes – however we have some way to go. Most of the big IDNGOs still often use questionable messaging that 'just about' stick to the Dóchas code, or don't meet it. There is no accountability mechanism so there is no incentive for organisations to stick to the code, and the public are not aware of the importance of the code's principles so they do not hold organisations to account."* **"**

Another explained that NGDOs are *"still not good at having the voice of the participants highlighted"* and one was very scathing, saying that

> **"** *"I think they are rubbish. The key images you see are still the flies on babies and skeletons walking across deserts. This is absolutely not the imagery that Africa deserves and its usage is short sighted and self-serving. There is no consideration of the dignity of people or the detrimental effect use of these images has on the continent. I know very few NGOs who actively and consistently promote positive images. Many have them on some of their publications but when it comes to fundraising campaigns, out come the heart-squeezing images again."* **"**

In one focus group discussion, the 6 participants were asked to comment in general on NGDO representations, what they liked about what they are doing and what they could improve upon, and how they would like to see NGDO representations changed. Their answers to these questions are reflected in Table 2 below:

Table 2: FGD1 – Question 1 and 2:

Question 1: If you were to change one thing about the images used or the messages conveyed by IDNGOs in Ireland, what would it be and why?	Question 2: In terms of ethical communications, what do you think IDNGOs in Ireland are doing well and what could they improve upon?
Stop images of people looking incapable	**Doing well:** powerful, dignified images; showing progress, examples of progress; great stories but don't have same push behind it as appeals, great content and potential but doesn't have the same reach, e.g., social media don't see that content on billboards and marketing etc; some creative stuff – walk in their shoes, getting people to act, innovative; individual stories, putting names to faces, families etc 'love conquers fear'; policy document images, branding of images with captions but not attributable to agencies, beautiful positive images showing change and positivity but general public will never see it
Stop the use of starving children	
Less suffering and distress in images	**Improve upon:** typecasting individual, is that all women in that region are they like her? Very dangerous, stereotyping, typifying; focusing on the differences between us and them rather than seeing where there is links – look in the eyes and see what you see, we're the same but so much focused on how we're different; same organisations, over-reliance on fundraising and white saviour aspect – you can help this child, you can do this, you have the power to make this person's life better, too much of that stuff.
Make images more positive	
Stop the 'crisis, crisis, crisis' messaging	
More dignified, positive and realistic representations, less sensationalism	
Stop using photos of starving children with flies on their eyes	
Stop the black baby images	
Begging bowl approach	

In relation to interviews and focus group discussions more broadly (below), I present findings around areas of improvement with reference to themes rather than questions asked, focusing firstly on comments about representing reality, context and complexity. I then discuss issues around stereotyping, agency and voice.

Representing Reality, Context and Complexity

How participants understand the relative importance of representing reality, context and complexity differs. Though calls for complexity tend to be associated with educators, here many fundraisers and communicators also talk in these terms. For fundraisers, responsibility to represent reality tends to be framed in terms of 'need', or 'real need' (Izzy – 3; Ruth – 2), where being truthful is associated with not distorting people's experiences or words (Oscar – 1). As such, truth is seen to be about conveying accurately what is happening in a particular situation. In order to do that, they see the importance of representing context. Context can be localised to the particular person's situation, i.e., seeing a child in a parent's arms, or a family in a village, or to more detail about what caused the particular situation. In this case, cause can be interpreted as immediate, i.e., x is hungry because the crop failed or y conflict caused this refugee crisis. Or, it can be more structural, x is hungry because the crop failed due to climate change. The need for complexity was also highlighted by a number of participants, including Jack – 2, who asked *"are we always communicating the complexity and the depth and complexity and complicatedness of poverty and of people living in crises areas and in fragile contexts? We are not."*

Despite many people highlighting its importance, the main point emerging around context and complexity is that it is extremely challenging and that NGDOs shy away from it, especially in fundraising communications. Freja – 3, for example, said *"I would be one of the people saying stop treating people like they're stupid… if you want to mobilise public support, you tell them these lovely people are dying of hunger rather than saying will you come on a journey with us as we explore some of the systematic and institutional challenges".* Victor – 1 believes that *"one of the big challenges Ireland and Irish people have is that lack of understanding of the depth of issues, and when it comes to communicating the complexity of issues, maybe people aren't where we want them to be, or maybe younger generations are but the older generations aren't".*

Stereotyping

As reflective of other research, stereotyping also emerges here as a significant challenge and ongoing problem in NGDO representations. Steve – 4 feels that *"NGOs, they are not really changing that perspective. In many ways they are perpetuating that perspective of backward people, people who need help, because even in the face of so many changes that have been happening in the last 30 years, there's not much shift in how NGOs communicate development."* He goes on to talk about how whole countries are portrayed the same and about problems with stereotyping Africa. Like other people of African descent interviewed, he feels that a lot more effort needs to be made by NGDOs to portray equality and to explain *"what's happening in the world, why certain countries are like that and what's happening in general".* Stacey – 4, also from an African country, explains: *"I think there's a lot of sensationalism where you are doing this extreme publicity to shock people into donating…. the way you portray Africa, the way the organisation shows the kids… you are only showing one side of the actual, what's happening there".*

Another issue which emerges re: stereotyping that those of African descent share is that representations reflect the *"same story… of a bad situation"* (Max – 5) or of "backward people"

(Steve – 4), and of *"misrepresentations"* and *"misunderstandings"* (Julia – 5). As Alex – 5 put it, *"where I see the stereotyping, you don't see much of the good that is happening, you see, you get all the bad news and the wars and everything, but when good things happen, you hardly see the good things".* They also share a view that representations are different to those that Irish people would be comfortable with or to how issues are represented by organisations working on national issues. One participant, Alex – 5, used the example of the way in which the Ugandan, Vanessa Nakate, was cut out of the photograph of young Climate Justice activists, to illustrate this tendency. Stacey – 4 said, *"when you think about it, the advertisement here in Europe, when we're talking about anything, even if we're talking about children, we're so careful of what we are portraying here, the image that we're putting out, so why should it be any different"?* Andoline – 4 said *"I always find a bit much talk about Ireland and we understand it because of our famine or whatever, but I don't think Irish people want to be portrayed in that, –aren't they slightly pathetic and aren't they to be pitied' kind of way. Nobody wants to be pitied."*

Agency and Voice – 'Us' and 'Them' Stereotyping

Concerns about stereotyping overlap very much with representations around agency and voice, as they do with issues around using images (below). In light of criticisms of *"a lot of top down communication"* (Elizabeth – 5) or a *"a hand out, top down approach"* (Max – 5), as outlined above, Oscar – 1 believes that *"speaking on behalf of people is particularly worrying, patronising and goes against the grain and spirit of what our organisations are attempting to do".* While agency is about voice and creating narratives, there is also a concern among participants about how Africa is homogenised and represented. Elizabeth – 5, for example, explained: *"the people I was working with, were being talked about as one homogeneous group…. the group in the local NGO was incredibly diverse, whereas they were being talked about as if they were all the same and not like us".*

Faith – 4 believes that this pitting of 'us' against 'them' is very damaging. She gave the example of some of the NGDO communications early on in the COVID-19 pandemic:

> *"I remember back at the start of the first lockdown, I thought some of the comms from IDNGOs was awful, it was really dismissive of the hardship people were facing in Ireland, and it was kind of you know, 'you think you have it bad, try having COVID in a refugee camp in Syria. I think it's really unhelpful pitting us against them all the time… you're not pitching your message right here, you're not tapping into common identity or common experiences."*

Stereotyped representations which deny people in GD agency were described as damaging by a number of participants and associated with *"the white saviour trope"* (Victor-1). On the one side, portrayal of desperate, negative and needy situations was mentioned, where people are homogenised, victimised or infantilised. These are represented as such in contrast to the agency and power that NGDOs, donors and supporters have to bring change. Linda – 5 explained that "*it's really harmful if you put images of African spaces where people can't do anything, infantilising the whole continent, and that also affects us who are African Irish living here. Because the way people first meet, that's how they see us".* These types of portrayals were described by Andoline as

> ❝ *"if you were to look at the photo or the video and if it was you or someone related to you and you hated it and it made you feel like crap, then I don't think you should be using it. To use bigger words, if it strips the dignity of the person in the photo, if it makes you consider that person to be helpless and less than in some ways than you or if it doesn't give any sense of the agency, maybe not of the person if that person is a child, of the community or that country, I think that kind of messaging is really problematic."* ❞

Considerations around agency go beyond criticisms of what's actually presented into highlighting what needs to be focused on more. Julia – 5 explained that organisations should be amplifying *"the local effort… they make them look that things are the same and the same and the same. We need to amplify the local stories more and more and more to show there is hope and they are doing something."*

The Effects of Representations on Racism, Equality and Diversity

Concerns around the effects of representations on racism, the role of NGDOs in perpetuating colonial relationships and about how or whether those represented in NGDO communications participate in decision-making around representations all emerge very strongly in the research. Many participants refer to the impact that the BLM movement and criticisms from a growing diverse population in Ireland have on greater sensitivity to these concerns among NGDOs. At the same time, though most see this as a positive thing, many feel that NGDOs have a long way to go. Where nearly all participants highlight some aspect of this issue, it is mainly those participants of African descent, whether working in a migrant organisation or otherwise, who speak about it in any depth.

Colonial Representations and Racism

Much of the criticism of representations related to racism is around images that NGDOs use and DRTV ads (discussed above). Steve – 4 argued that images *"perpetuate that history, that narrative of colonial and colonialism that was there before"*. Through those images, he argued, *"organisations are participating in the colonial project and the racism project… to continue putting them in the light that they will never be emancipated, they will never be free or as equal as people in Ireland or in the world"*. For Alex – 5,

> ❝ *"the issue of racism, it can never be over flogged… it is deep in the roots, it is there in the bone marrow, the kind of inferiority/superiority complex playing out there and that some people are different from the other person, all those things and sometimes we internalise some of these things and we think it's the norm"*. ❞

While many are critical of the inherent inferiority in terms of how people are presented in images, or more broadly in fundraising campaigns, some also highlight that this goes deeper than having people 'tell their own story'. Those involved should be *"representing themselves"* (Julia – 5) and organisations should be working with *"more local journalists… local perspectives"* (Elena – 4). For Julia – 5, this is also about NGDOs being open to listening and seeking permission: *"I'd want*

someone to listen and wait for me to finish…. White people will ask you something about yourself but when it gets sad, they will tell you to stop because it is hurting them… be patient and ask, ask for permission if it's something that's not appropriate so that someone wouldn't have to answer that".

Effects on Experiences of Racism

A key dimension of racism that participants talk about, especially those from African countries living in Ireland, is the link between NGDO communications and the racism they experience in their daily lives. This ranges from subtle assumptions that people have about people from Africa living in Ireland to *"bullying … and abuses people get"* (Linda – 5). Julia – 5 talked about *"the spill over effect is racism… when they see these people are so poor… I know how to flush the toilet you know, because of some of these images, there's also the danger of generalisation".* Linda – 5 explained that

> *"there's already this assumption about how you live before they ever came here. Like people say, do you live in trees, people saying, you know, just stereotypes, yeah, it's what leads to the verbal abuse, the racial abuse, the bias in employment, because you still get that, even at my level, the assumption is that the person is not capable. It's damaging lives, it's the lack of self-esteem, suicide, you know, mental health, our young people… what they say, when these things come up in the classroom, they generalise a whole continent".*

Stacey – 4 points out that "*it's not just the child that's upset, it's the whole family… you have to know when you go out there that Ireland is changing and there's different children in classes now".*

Black Lives Matter and Diversity in Ireland

Linda – 5, like others, feels that there is more emphasis on the effect of NGDO communications on racism in light of the BLM movement and the growing diversity in Irish society: *"there is a focus on the harm that is done to people, so there is a connection to those images that fosters inferiority stereotypes that people who look like me live with every day".* Victor – 1 referred to the fact that

> *"comic relief are not sending out white celebrities any more because of the backlash they've faced, that criticism, so that's a sign that things are changing… that puts it up to us, that shows us that this debate is having an impact. Practice is changing and sometimes you need a scandal to force an organisation like comic relief to change their policies or you need something like the BLM movement to provoke these conversations, but they're happening."*

Steve – 4 highlights the effect of NGDO communications on children of African descent, e.g.,

> " *"the way you portray the African children who look like other children here in Ireland… I hear some children, even little children, saying 'I don't like to be black Mam, I don't like to be black. All these things, it's not something out there. You are not helping children out there in Africa. Those African children are here in Ireland. So I think from the past it was 'let's help the black babies in Africa', but now the black babies are here, the African children are here and babies are here and it affects those children in their relationships in school and growing up."* "

Tensions re: Fundraising and Communicating Complexity

Alongside fundraising communications, the use of images is another cross-cutting issue in the research. Guarding against stereotyping and critical of *"degrading images"* (Julia – 5), the point is made that images are often used as marketing tools, specifically to elicit emotive responses and for fundraising purposes. While some regard NGDOs as having a responsibility to use of photographs to convey the harsh reality, Julia – 5 saw photographs as a way of capitalising people and situations for NGDO ends. *"I'm not saying that some situations should not be highlighted but I'm also critical of the way those situations are highlighted",* she said. Charles – 3 suggested that the organisation he works for wouldn't use *"images of starving children as a marketing tool or to promote events"* because that *"power dynamic between Western aid givers and recipient aid receivers… perpetuates a preconception that some people have that other societies are helpless and therefore they need our help".*

Victor – 1 sees NGDOs as responsible for creating these stereotypes through fundraising: *"when people think about development, they think Africa, you know, they think Black children. Now, why do they think that? They think that because predominantly that's the image we use for our fundraising campaigns, that's what they see on the TV. Time and time again, we go to those images because they work in terms of fundraising and fundraising has the biggest impact".* Arthur- 1 described some of the challenges around this, around grappling with complexity in representations while still portraying the need that NGDOs identify. He explained that the organisation he works for is *"very aware of communicating how we represent Africa"* and particularly concerned to reflect truth and accuracy. Doing so, means representing African countries with all their complexity. On the one hand, half the population of a country might be experiencing hunger whereas, for example, *"there's also a middle class in Zimbabwe and there's a financial district and not everyone lives like this".* He outlined that this can be explained in a school talk but *"in our above the line comms and marketing… how do you communicate that in a way that you're not stereotyping an entire continent? It's very difficult."*

Faith – 4 feels that there's a kind of *"dumbing down the public"* when information given about humanitarian situations is limited. *"It's really damaging, it feeds into racism, it feeds into an us and them mentality, it feeds into really restrictive migration policies, that these people, this is how their country is and they're corrupt and they can't look after themselves and it's their own fault somehow. It completely excludes us in terms of contributions to this unfair system that we've all benefited from in the West really, most of us, since colonialism."* Áine – 4 feels that in these *"difficult situations, the question is around ethics… there is the loss and inability for people to be honest and to speak the*

truth and for that to be enough… not being used as a marketing tool or like any kind of hook but just their stories being heard".

DRTV Ads

These issues are highlighted with most intensity by research participants with reference to the DRTV ads shown on TV and often reproduced on social media. These are among the aspects of NGDO communications, fundraising or otherwise, that most participants are *"most uncomfortable with"* (Alice – 1) or which cause *"the biggest reaction internally"* (Oscar – 1). For Chloe – 1, *"I would say at this point for X, the only elephant in the room is the DRTV ad, everything else has moved on".* Victor – 1 believes that they *"have huge power in shaping people's perceptions… more than online campaigns, advocacy campaigns".*

While Stacey – 4 believes there is a manipulation aspect to the way DRTV ads are portraying situations: they are about *"trying to shock people into donating"*, Adrian – 2 explained that

> *"on the one hand you don't want to upset people but on the other hand, we need to make sure that the budget we're using for fundraising are being used in the best possible ways… in all the activities we do, TV advertising is where we get the best return on investment at the moment, so it's a little bit of a balancing kind of action. Should we take out the hardest hitting imagery knowing it will have an impact on the return on our investment that we make?"*

The effects of lack of complexity on critical public engagement are also highlighted. Alice – 1 thinks that DRTV ads are counter-productive and that they need to be addressed:

> *"You wouldn't know anything about the people in it. You don't know anything about the situation, the background, the complexities. All you're seeing is the poverty, and I don't think it's actually working that well at the moment. The idea is that it makes people give money. I don't think it brings Irish people along either on why there is poverty, why it still exists, what are the structural causes. It just has an immediacy and an ask."*

This view is shared by Faith – 4 who linked them to donor fatigue and the need for NGDO communications to support more active engagement in GD beyond donations.

Summary of Research Participant Findings re: NGDO Representations

In this section, I have introduced critiques of GD representations from a number of different perspectives and findings from participant research. Significant among the findings here are that:

Participants feel that while NGDOs are trying to implement ethical communications across their organisations, there are still significant gaps in this regard and they have a long way to go. There are ongoing issues with stereotyping and agency, and with 'us' and 'them' binaries. These are particularly acute with fundraising communications, especially with DRTV ads.

While fundraising and DRTV ads emerge as the main area which comes under criticism, many understand that there are significant tensions involved. Most acknowledge areas of improvement with regard to fundraising representations and that fundraisers try to communicate ethically, would communicate ethically if they were not under so much pressure to meet financial targets, and often do communicate ethically, at least when it comes to reflecting stories accurately.

The extent to which the values and principles outlined in the Dóchas Code are reflected in NGDO representations is something of *"a mixed bag"* (Martina – 1). While most participants feel that NGDOs most of the time represent people with dignity and respect, they see that this can be compromised when the value of 'truth' (in this case understood as accuracy and non-manipulation of images etc) is deemed to be more important or urgent, i.e., when there is a crisis or emergency. Sometimes, as we have seen, truth is held up in opposition to 'sensitivity' by some – with dignity and respect conflated with 'positive' images. As we have seen with Stuart Hall's (1992) work, replacing negatives with positives does not undermine stereotypes, and it can create other, albeit more palatable, ones. To address stereotyping requires alternative frames, subverting existing tropes, representational conventions and practices. Thus, there are challenges with representing people with dignity and respect in challenging crises or emergency situations. Most participants here suggest that in the end of the day, financial imperatives win out over complexity, especially in humanitarian situations.

The question of whether an organisation's representations should be judged to be ethical or not based on one example or one instance of communication is prompted by findings here. As evident above, DRTV ads are sometimes afforded this 'exceptional' status as if they are ok because of the requirements of the situation and given that otherwise communications have improved. This is not the view held by everyone, some of whom highlight the considerable effect of these ads and how they can challenge or undermine other ethical communications efforts of an organisation.

Another important issue to consider, as prompted by findings here, is organisational interpretations of what constitutes ethical communications. There tends to be an emphasis on representing people with dignity and respect, on not purposefully stereotyping and on truth (as accuracy). The latter relates to context, with some feeling that once something links to further information or a child is not pictured on their own, then the requirement around context is met. Others think that accuracy is not a sufficient measure of truth and that truth requires not only basic context but some depth – context around cause and effect, around global responsibilities for poverty and injustice and around the limitations of the role of NGDOs in addressing particular situations and around a person's story. Several layers of 'why' need to be answered. Similarly, other values like solidarity, agency and complexity are as important as dignity and respect.

There are different views on the extent to which NGDOs represent people's agency fully, with some scathing critique of the representation of 'others' as 'helpless' or at least not as active participants

in their lives or futures, and of governments as absent or powerless, with the corollary constructed that NGDOs have agency and should be supported. This tends to obscure structural influence and culpability for GD challenges and buttress individualised responses rather than those directed at economic systems or political decision-making.

The effects of stereotyping and racialised representations comes out strongly, especially from those from African countries living in Ireland. Research from other contexts also highlights the importance of NGDOs not presenting stereotyped messages to a supposedly homogenised audience (Ademoulu, 2021), and of listening to and ensuring the inclusion of the experience of 'the people in the pictures' (Warrington and Crombie, 2017) who argue for more balanced portrayal and the need to tell their own stories.

Thus, stereotyping is still a problem which is particularly highlighted by people of African descent who address misrepresentations and the absence of complexity in terms of balancing images. This overlaps with issues of agency and voice, with people concerned about 'top-down' patronising and binary forms of communication as well as homogenisation, victimisation and infantilisation, especially in relation to Africa. The effects of stereotyping and traditional forms of communication (particularly, though not exclusively, in fundraising and DRTV ads) on racism, also emerges very strongly. This is manifested in the way people of African descent are spoken to, in subtle assumptions they experience about them and in bias, bullying and abuse.

Section 3:
Drivers of GD Communications – Constraints and Opportunities

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Existing Research

As we have seen in Section 2, a significant challenge facing NGDOs in their attempts to engage in ethical communications is the tension between fundraising requirements and the success of 'traditional' style representations for donations, on the one hand, and the types of complex, nuanced, and connected communications which support more active public engagement and equality, on the other.

In this section, I reflect on the broader context shaping GD communications with a particular focus on how different drivers support or constrain efforts to engage in ethical communications. It is important to note that these drivers can have contradictory effects. Here, I focus on the international GD context, the Irish GD context and changes with regard to GD communications more broadly.

International Global Development Context

As we can see below, the international GD context has a significant influence on GD communications among NGDOs. At a global level, growing GD challenges and unfulfilled state aid commitments are increasing pressure on NGDO fundraisers. The aid effectiveness agenda, with its emphasis on professionalism, governance, accountability, measurement for results and localisation, has both potentially constraining and enabling effects on ethical communications. On the one hand, it can lead to 'tick box' style superficial implementation of compliance measures while, on the other, it can advance more democratic and participatory ownership of communication processes and accountability. The SDG framework's emphasis on universalism also offers opportunities for more egalitarian approaches to GD, with implications for NGDO representations more broadly.

Contemporary Global Development Challenges and Challenges Regarding Aid

Any discussion of the contemporary development cooperation context, is bound to begin these days with COVID-19 and the challenges it has brought. The Reality of Aid (2021) for example, argues that the world faces a triple crisis of poverty, inequality, and a climate emergency, compounded by a global pandemic. Highlighting cuts to the UK aid budget in the last year, marginal increases in ODA overall and preoccupation on the part of official donors with private aid flows, it argues that aid is "a weakened resource that is ill-equipped to respond to the urgent responses to the pandemic" (2021: 5). As such, Tomlinson (2021: 126) argues, "current levels of humanitarian assistance do not meet the unprecedented and complex consequences of conflict, pandemic and climate change impacts… in 2021, the international community provided not even half (44%) of the UN humanitarian appeals and the Global Humanitarian Response Plan for COVID-19 in 2020 (November data). More than 1 billion people are living in countries affected by long-term humanitarian crises, with more than half the population of these countries living in poverty."

The inadequacy of institutional aid is augmented by calls for greater commitment on the part of governments to resource the Sustainable Development Goals (SDGs), to support and implement policies supporting refugees fleeing conflict or climate disasters, and to live up to their promises

around contributing to global COVID vaccine aid schemes, e.g., COVAX. It has also led to a 'crowded fundraising market' where UN institutions now 'compete' with NGDOs in the individual donor market in order to meet the shortfalls in institutional funding. And this is happening at a time when there are growing GD challenges.

The Irish government, for example, in its policy on international development, highlights the persistence of poverty, inequality, hunger and food crises around the world, especially in sub-Saharan Africa where "conflict, the impact of climate change and intensifying inequality exacerbate these fragilities" (GOI, 2018: 9). Though it has never reached its own aid budget targets, the Irish government is considered to be progressive in terms of the quality and poverty focus of its development cooperation (OECD, 2020). In its policy on international development, 'A Better World', it argues that the SDGs are the overarching frame for its approach "to delivering for the poorest and the most vulnerable" (GOI, 2018: 13). In so doing, it explains that "prioritising gender equality, reducing humanitarian need, climate action and strengthening governance are key strategies for directing our development cooperation to the furthest behind first" (ibid).

Such an analysis reflects the centrality of the SDGs to contemporary thinking on development co-operation. Its emphasis on universalism offers opportunities for NGDOs to present narratives around development, which acknowledge global responsibilities for injustice and inequality and to emphasise structural and systemic economic and political influences. Its widespread agreement also offers opportunities for holding governments to account on aid commitments.

The Changing Role of NGDOs – Professionalisation and Sophistication

While historically, NGDOs have played an important role in development cooperation in Ireland and internationally, their influence has grown in recent years. Changes in the global development 'industry' or 'sector' over the past thirty years or more, have led to growing organisational and institutional sophistication, the expansion of some NGDOs in tandem with their international federations or alliances (with some now operating as conglomerates), and growing complexity in the relationships NGDOs navigate in a range of different roles. Combined with the development of new managerial business, governance and accountability practices and emphasis on effectiveness, measurement and results, NGDOs have professionalised and become more and more like businesses operating transnationally and competing in markets. Though some NGDOs remain small, most still retain their civil society credentials and links to varying degrees. While some have deep roots to communities and activist groups they work with 'on the ground' in long-term development or areas of specific concern, others concentrate more on humanitarian intervention in times of crises.

There has been significant emphasis in development research, over many years, on understanding power relations, the institutionalisation of development cooperation through State-NGDO relations and their effects on GD processes (Hilhorst, 2003; Eyben, 2013; Howell, 2014; Banks, Hulme and Edwards, 2015). Analyses and critiques of the roles and relationships of the state and NGDOs in development (Hulme and Edwards, 1997) have a long history in development studies and they cover a vast range of power-related debates. Though NGDOs argue that without state funding or engaging with global institutional donors, their work would be severely hampered, many understand that it leads to compromise. At the same time, many exert considerable influence over government policy, especially in relation to different aspects of development cooperation. Thus, their roles are increasingly imbricated in official development cooperation efforts through advocacy, policy development and sophisticated partnership relationships. At the same time, many retain some considerable independence through funding from individual and other institutional donors. A key

challenge for NGDOs, therefore, in their communications, relates to how they navigate these different and sometimes competing audiences (Hudson et al, 2020).

The centrality of communications to NGDO practices and relationship- building is also highlighted, especially in relation to establishing its credibility and building trust. In studying NGDOs, Hilhorst argues that "everything happening in and around NGOs has a bearing on the politics of power within the organisations… NGO actions are geared towards legitimation, which means that, in order to find clients and supportive stakeholders, NGOs have to convince others of their appropriateness and trustworthiness" (2003: 4).

Aid Effectiveness – Accountability, Governance and Measurement for Results

Aid effectiveness has become an important framing for NGDO good governance and accountability in recent years. Vahamaki et al argue that there are different pressures which have led to their prioritisation: "during the past decade, against a backdrop of growing financial constraints and a tough global debate on the efficacy of aid, there has been considerable external pressure for development cooperation agencies to reorient their management systems towards effectiveness and results" (2011: 4). They go on to argue that supported by "the High-Level Forum on Aid Effectiveness (HLF – 4) in Busan, South Korea, held in November-December 2011, the results agenda has received even more emphasis and is currently a top political priority. Renewed scrutiny has intensified calls for accountability to tax-payers both in donor and recipient countries, and the need for results information to improve planning and analysis of what works" (ibid). For them, without "effective provision of value for money, there is a risk of undermining the credibility of development cooperation, and that otherwise willing financiers might stay away" (ibid).

Eyben (2013) argues that a changing aid landscape with reduced donor interest in rights and transformation has led to a discursive shift in emphasis from results and value for money in the 1990s to performance and payment by results in the 2000s. She suggests that with evidence-based approaches, "development assistance becomes a 'technical' best-practice intervention based on rigorous objective evidence, delivering best value for money to domestic taxpayers and recipient country citizens, without interfering in that country's politics" (Eyben, 2013: 19). This can lead to emphasis on technical, 'upward' accountability, which has a negative effect on participatory and democratising processes. What's seen as good for professionalism isn't always good for diversity. Thus, though aid effectiveness can support ethical communications in its emphasis on accountability, transparency and professionalised practices, it can also, if interpreted narrowly and superficially, lead to the perpetuation of 'business as usual' practices promoted in the name of change.

Aware of the pitfalls of technical – style measurement approaches, the Busan Principles (2011) agreement stipulated that the following principles are necessary for effective development co-operation: "Ownership of development priorities by developing counties: Countries should define the development model that they want to implement. • A focus on results: Having a sustainable impact should be the driving force behind investments and efforts in development policy making • Partnerships for development: Development depends on the participation of all actors, and recognises the diversity and complementarity of their functions. • Transparency and shared responsibility: Development cooperation must be transparent and accountable" (OECD DAC, 2012). The international focus on aid effectiveness and governance was paralled in Ireland with the establishment of the Charities Regulator in 2014 following the Charities Act 2009.

Though official perspectives on development effectiveness have prioritised a focus on the technical and instrumental, and on measurement, efficiency and value for money, in Ireland, NGDO perspectives have been more inclined to focus on 'quality', on 'downward accountability' and on civil society activism. The challenge is making 'downward accountability' meaningful when it comes to ethical communications, especially in light of state-NGDO relations and the tendency towards auto-surveillance, in Eyben's (2013) terms.

Such drives towards aid effectiveness can support ethical communications through the creation of more inclusive, egalitarian and decolonised cultures, but they need to be buttressed by leadership within the NGDO sector which challenges existing practice and power relations. These issues are discussed in Section 5.

Localisation and Decolonisation

A second trend in development cooperation of interest here is the twin drives towards 'localisation' and 'decolonisation'. Discussions around the importance of localisation have been central for Dóchas in its recent Strategic Planning process (2021) with some disagreement among NGDOs represented over how it is understood and how it can be practically applied. At the World Humanitarian Summit in 2016 a 'Grand Bargain' was agreed with an emphasis on localisation. It stated that the "commitments coming out of the World Humanitarian Summit promised significant changes, ones that are conceptual (Triple Nexus), institutional (Grand Bargain) and programmatic (New Way of Working)" (Reality of Aid, 2021: 11). The point was for humanitarian work to move towards greater involvement of local actors with a commitment on the part of governments to provide at least 25% funding to local actors.

While this move to ensure the engagement of those affected by GD efforts more centrally in humanitarian work could have democratising effects on representational practices within NGDOs, the Reality of Aid argues that little has changed. Contrary to promises made in 2016,

> "direct funding to local humanitarian organizations in the Global South decreased from 3.5% in 2018 to 2.1% in 2019 – a far cry from 25%. This trend is not surprising. At the macro level, INGOs are playing an increasing role in the aid system. They have increased their share of ODA channelled through CSOs from 17% in 2010 to 27% in 2018, while Developing Country Based CSOs saw their share increase imperceptibly from 6% to 7%. The increased share through INGOs has been at the expense of Donor Country based CSOs, whose share declined from 77% in 2010 to 66% in 2018. Support for CSOs, whether as humanitarian or development actors, remains highly skewed towards donor country and international CSO intermediaries" (Reality of Aid 2021: 14).

Such calls for localisation are reflective of attempts to democratise and support participation which is not just tokenistic or consultative but which ensures that those most directly affected by development processes have greater ownership of them. From an ethical communications point of view, localisation can support greater ownership of communication practices and processes among those most directly affected by them and emphasise the experiences of those most marginalised or oppressed by current socio-political and economic systems.

Though not reflecting the same origins, under the rubric of 'decolonising development', a similar drive has come in recent years from those applying post-colonial or anti-racism analysis to development cooperation processes and organising. Rising populism across the world and in Europe, challenges to civil society freedoms, rogue states and beleaguered multilateralism

(CIVICUS, 2021), along with calls from the BLM movement and others for broader discussion within development circles about racism and the need to decolonise development (Stein and Andreotti, 2016), have all presented complex challenges and opportunities for NGDOs. In its recent discussions around its strategic plan, the importance of equality, diversity and inclusion (EDI) came to the fore for Dóchas members, where some highlighted the growing influence of the BLM movement, and the need for NGDO agendas to be driven more by those most directly affected by them. Though discussions around this area appear to be in their infancy in Ireland, it is clear that significant work has been advanced in the UK. This has led to the recent publication of the report on decolonising aid by Peace Direct (2021). Following the publication of its research 'The People in the Pictures' (2016) and the recent Bond guidelines of a similar name, Save The Children has declared itself an anti-racist NGO (in 2020). This signals growing opportunities to link ethical communications to EDI and processes which decolonise GD communications. These issues are discussed in greater detail in Section 5.

The Global Development 'Sector' in Ireland

Within the GD sector in Ireland there are many different drivers which both constrain and enable ethical communications.

Organisations engaged in GD, usually referred to as the GD 'sector' in Ireland, include state and non-state actors. It is dominated by the Irish government's GD section of the Department of Foreign Affairs and Trade (DFAT), Irish Aid, alongside NGDOs and humanitarian aid agencies. As the latter two are often overlapping and different organisations prefer to apply different terms to themselves, as I explain above, here the term NGDOs refer to all non-profit, non-governmental organisations engaged in GD and/or humanitarian and/or education, advocacy or campaigning work. Some organisations span the areas of GD, humanitarian and education/engagement and some are big, in financial and staff terms, while others are small. Some organisations have been in receipt of Civil Society Programme Funding for Development programmes from Irish Aid, whereby they apply for and are granted multi-annual funding for an agreed programme of work[1]. Some of these are also funded through Irish Aid's Humanitarian Programme Plan (HPP) to provide predictable and coordinated funding to six key NGO partners – Concern Worldwide, Plan International Ireland, Trócaire, World Vision Ireland, Oxfam Ireland, and Christian Aid Ireland, while some are funded specifically under the Irish government's DE grants scheme.

Dóchas

Irish Aid 'partners' and many other smaller organisations are members of Dóchas, the Irish Association of NGDOs, with 57 members (46 full members and 11 associated members) registered in August 2021. According to its website, "the purpose of Dóchas is to be a meeting place and a leading voice for organisations that want Ireland to be a world leader in efforts to bring about global justice", (https://www.dochas.ie/about/). It explains that "through collaboration and coordination, Dóchas works to create a more just and equal world, where solidarity and respect for human rights are the norm. We do this through our working groups, by developing standards of excellence and by being the voice of the network" (https://www.dochas.ie/about/our-work/). Its values are outlined

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1   In 2019, there were fourteen such partners: Action Aid Ireland, Children in Crossfire, Christian Aid Ireland, Concern Worldwide, Frontline Defenders, Goal, HelpAge International, Oxfam Ireland, Plan International Ireland, Self Help Africa, Sightsavers, Trócaire, Vita and World Vision Ireland. Of these, Concern Worldwide was in receipt of the largest funding €21.31m with Trócaire following with €16.61m and Goal, the third largest recipient with €9.27m. (IA, 2021 – https://www.irishaid.ie/what-we-do/who-we-work-with/civil-society/civil-society-programme-funding/ accessed: 19th Aug 2021).

in Appendix 6, though as Dóchas has engaged in a comprehensive strategic planning process in 2021, these may change.

Overall, while NGDOs based in Ireland can be distinguished from each other in terms of their scale, i.e., measured in financial terms, they can also be distinguished along the lines of their mission and function. As such, included in Dóchas membership, alongside broader GD and humanitarian organisations that fulfil a range of functions, are those organisations whose main emphasis is development education (DE) or global citizenship education (GCE), public engagement, advocacy and/or campaigning, volunteering, network membership and support, human rights or care. Furthermore, membership includes branches of transnational organisations, which have set up in Ireland, as outlined below.

All Dóchas full member organisations are involved, to greater and lesser degrees in communications around GD, human rights, global citizenship education (GCE) etc, with widespread use of and engagement with social media, members, supporters etc. Most Dóchas member organisations are also in receipt of some official funding for their activities from Irish Aid, the EU or other government departments. All have some professional staff and many engage in active fundraising among members or supporters, though only the organisations with bigger budgets tend to use direct response television (DRTV) ads or newspaper enclosures.

While NGDOs work together through Dóchas, there is also eclecticism with different NGDOs working in different areas and espousing different approaches, cultures and identities. They are drawn together through membership of Dóchas, and there is a tendency to work towards consensus positions and agreement there. This has been the case with the Dóchas Code.

Growing Professionalism and Fundraising in the Sector

As NGDOs have grown in scale and sophistication, there is growing professionalism within the NGDO sector in Ireland. This includes the appointment of highly qualified professional marketing, fundraising, communications, advocacy and education personnel. This has served to integrate broader business and management practices into NGDOs. It has also increased emphasis on research and innovation, computerised testing of marketing strategies, monitoring of social media and the engagement of contract personnel for communications and other specific areas of work.

In the context of fundraising, professionals coming with a business and marketing background are trained to transfer practices from commercial contexts into the NGDO sector, to make fundraising communications more 'professional looking', more 'targeted' and generally more successful in terms of the 'bottom line'. This can bring challenges when what brings success in funding terms replicates traditional stereotypical communication strategies. It also places considerable pressure on fundraisers and manager who tend to be risk averse when it comes to jeopardising funding, as highlighted by research participants here.

In terms of their broader work, traditionally, NGDOs in Ireland have worked separately to each other, trying to carve their own identity while not criticising each other. In the last two years, many have come together to form the Irish Emergency Alliance in an effort to respond to criticisms of duplication and to maximise fundraising capacity among many of the smaller organisations in their response to humanitarian emergencies.

Another fundraising challenge for NGDOs is the ongoing need for independent funding from the public and the tradition within the sector to fundraise from individual donors. These have established familiar tropes and styles of representation which have set up expectations among the public around what types of communications they are more likely to respond to or not. This highlights the importance of addressing these embedded practices at organisational and institutional levels.

Different Approaches to GD

In addition to these institutional factors which drive forms of communication among NGDOs in Ireland, there are also influences coming from different approaches to GD, with some more focused on 'problems', 'crises' or 'humanitarian emergencies' in 'developing countries' and others more focused on working with 'local partners' on 'human rights' and 'women's empowerment', for example. How NGDOs conceive of GD, the issues, power relations, and agency involved and the responses required, has a significant effect on their approach to GD communications. In order to ensure ongoing support for GD in Ireland, as outlined in the World View research (McShane, 2021), there is also significant emphasis on public engagement with its different understandings of support for aid and development cooperation and/or critical engagement with GD issues.

Communications and Public Engagement in GD

Amidst growing challenges for funding and in light of questions about the relevance of development cooperation there have also been calls for better communications and education on sustainable development (identified in SDG 4.7) as well as more active public engagement in development cooperation (OECD Peer Review Ireland, 2009 and 2020; Irish Aid Development Education Strategy, 2017 – 2023; A Better World, GOI, 2018). This has been helped in no small way by the central positioning of education for sustainable development (ESD) (GE and DE) in Target 4.7 of the SDGs.

This also raises questions about the type of engagement with or on the SDGs and GD that communications and education support. With a growing tendency to conflate public engagement to support for aid and/or the SDGs (Dillon, 2017), the question is to what extent DE or GD communications can enable critical public engagement in and around GD issues.

We have seen in the last section how tensions between fundraising and communications/education manifest in representations. These also emerge at organisational level where there are different perspectives around different communications agendas and priorities, with fundraising often seen to occupy the dominant position, as discussed in relation to research participants' views below. Before we explore those, it is important to look more broadly at trends in global development communications to set the scene for their impact on NGDO communications in Ireland.

Trends in Global Development Communications

In addition to the influences from GD, there are also significant influences on ethical communications from broader trends in GD communications. Many of us now understand that we live in an image-saturated world, a social media dominated, instantly connected world where memes and hashtags, tik toks and Instagram posts not only make and share the news, they have become the news. Internet and mobile phone connectivity has expanded access to information beyond what anyone could have been imagined twenty years ago, while bringing with them concerns about fake news, cyber security, algorithms and 'surveillance capitalism's' (Zuboff, 2019) domination

of communication channels. Thus, with advances in ICT and social media and their potential to democratise and globalise knowledge, information and communications, there are questions about power and ownership, about the effects of media saturation and attention spans and about the ongoing significance and influence of mainstream media forms and conglomerations.

Participatory GD Communications

It is into, with, and in light of, this complex and rapidly changing global ICT environment that NGDOs engage in GD communications. Though GD communications is often assumed to have an out-ward focus and one which involves some form of action or response, Servaes and Milikhao critique this linear and hierarchical view of communication. They contrast this diffusion approach to a participatory model which is based on multiplicity and which "stresses the importance of cultural identity of local communities and of democratization and participation at all levels—international, national, local and individual" (2008: 21). A participatory approach, thus, assumes a "right to participation in the planning and production of media content" (2008: 21).

Thus, participatory communication processes attempt to democratise communication processes and decision making. Servaes and Malikhao (2008: 171) argue that the UNESCO approach to participatory communication introduced in 1977 argued for access to media and self-management where "the public exercises the power of decision-making within communication enterprises and is also fully involved in the formulation of communication policies and plans".

The importance of taking account of power relations and advancing participatory approaches to communications has been highlighted at the World Congress on Communication for Development (2007). Though there were areas of agreement and disagreement regarding development communications, some key points emerged for development communications:

- "Communication is integral to development… it must be built into development planning and embedded in strategies for poverty reduction, health planning, and governance" (2007: xxvii).

- It has to be participatory – involve all stakeholders.

- "Participants noted that Communication for Development is about listening, as well as talking" (xviii).

- "Giving information is not the same as communicating—it does not address the structural issues that maintain poverty. There is also a place for the crucial and complementary role of purposeful communication programs (including communication campaigns) aimed at such goals as reducing the burden of disease and increasing women's control over their own health" (2007: xxviii).

- Communication has a role in holding people to account—including donors.

- There is a need "to build communications professional capacity, especially for "developing country practitioners" and of "the importance of ensuring that processes are valued as much as outputs or technologies" (2007: xsviii).

- "For communication to take place, there must be public spaces for debate: most people stressed the importance of diverse media. Access to information is important, but the means

and space to communicate are even more so. But Communication for Development cannot just be done through the media—people-to-people communication and community media are just as important. A responsive community media provides a way of making governance, education, and health initiatives more effective" (2007: xxix).

All of these points still seem very relevant for today, though with globalisation and the growth of access to digital and social media in recent years, the work for those involved in development communications has become ever more complex and important.

Communications with Different Groups

In light of the myriad opportunities available to NGDOs, and the challenges related to this shifting context (Thrall et al. 2014), Duong (2017: 121) explains that NGDOs have become more and more sophisticated in their attempts to reach their goals. As such, communication strategies are applied across organisations' work, with organisations communicating with different 'audiences' (Hudson et al., 2020) or stakeholders. Duong (2017) argues that "NGOs' communication strategies must accommodate different stakeholders, including donors, beneficiaries, governments, and so forth, to achieve the NGOs' organizational goals… The strategies must also be based on techniques and approaches that will help NGOs access a wide variety of audiences through suitable appeals and communication channels" (2017: 122).

Summary of Existing Research

We can see from the above discussion that the broader context of international GD, the GD sector in Ireland and GD communications can bring both constraints and opportunities for ethical communications practice among NGDOs. The shifting aid environment is putting greater pressure on NGDOs around fundraising, making ethical communications decisions more difficult, but the SDG language of universality and widespread sign-up to them offer opportunities to hold governments to their promises in this regard. This, alongside the growth and professionalisation of NGDOs internationally and in Ireland, highlights the importance of understanding power relations, institutions and cultural practices affecting NGDO communications. It also shows the importance of communication practices to NGDO relationships and to their legitimation. Aid effectiveness and accountability can lead to superficial implementation or democratising processes which enable NGDOs to be held to account. Similarly, the drives towards localisation and decolonisation of aid can sound good but they need to be transformed from policy into practice. Opportunities and constraints for NGDOs are also evident in relation to GD communications in our Internet- and media-saturated world. The challenge remains to turn communication channels and access into democratic and consultative spaces for diverse voices and forms of engagement.

Participant Research Findings

What are the factors driving NGDO communications?

In questionnaires, participants were asked to rank a range of options in order of how influential they think they are on NGDO communications. The options included were: IDNGO culture; needs of people that IDNGOs work with; customs and norms in the IDNGO sector; public engagement considerations; humanitarian or emergency considerations; donor influence; fundraising considerations; management considerations; the organisation's values. Of the twelve responses, fundraising considerations emerged as most influential, with all responders ranking this option in

their top 5 influences, of which, 5 considered it the most influential and three, the second most. NGO culture and organisational values followed in terms of what was considered most influential with the needs of people NGDOs work with and donor influence following.

In interviews and focus group discussions, in response to questions about the factors influencing or driving NGDO communications, a range of issues emerged among research participants. These reflected changes to the global communications and media context within which NGDOs operate, including the growth in use of ICT and social media, the professionalisation of the field and challenges in reaching diversifying audiences. Challenges related to shifts in the GD cooperation context were also highlighted. Among these are shifts in thinking about GD and the SDGs alongside funding challenges and organisational priorities around accountability and fundraising targets.

Fundraising Environment and Imperatives

Many of those interviewed specifically mentioned fundraising as a significant driver of NGDO communications. In an *"very competitive fundraising environment since the last crash"* (Victor -1), where *"the market is so much more competitive"* (Chloe – 1) and *"difficult"* (Arthur -1), Freja – 3 thought that *"fundraising is the single biggest driving force… it's not about education, it's not about changing systems, it's not about lobbying and advocacy, it's not about building movements for change, it's about raising money"*. Within this broader context, various aspects of fundraising are regarded as being significant. While some people highlight 'donor fatigue' as affecting the need for more sophisticated communication strategies, others identify the importance of communicating to their own donors. As one person put it, *"repeat business is the best business"* (Paula – 3).

Avoiding Risk

The impetus to avoid risk and to continue doing what 'works' was referred to by one participant in the following way:

> *"in Ireland, over the course of 60 years, Ireland is a very generous country based on stereotypical views of poverty and organisations built up their fundraising strategies using that understanding of the public – there's this huge bank of evidence and years and years of data that says if you do it that way it works. As that work weakens, there's a very hard place now, do you jump and try something new that might not work for a few years but in 10 years, 15 years, and try and be ahead of the game, or do you stick with what's working?"* (Jack – 2)

The same person articulated it a different way in explaining that influence *"comes from the public and donors too because they are responding to these messages, they are actually influencing what the messages will be. Because they are responding to another emergency appeal for a famine in East Africa, they are actually influencing, giving the message, go again, go again. That plays a strong role."* (Jack – 2)

That the funding imperative is strong emerged even when organisations try new and more creative approaches to advertising. One person described a new digital fundraising her organisation was developing which, she described as *"completely different to anything that we would have ever*

done, digitally, to fundraise" (Elisha – 2). Even in that case, because it is based on fundraising, she explained that *"the primary objective of this campaign is to fund our programmes overseas, so yeah, it would be KPIs against fundraising – that normally is linked to how much money it has raised vs how many regular givers it has recruited, how many cash donors it has recruited, what's the average gifts it has attracted, so there's a number of KPIs against it"* (Elisha – 2).

Donor Fatigue

Donor fatigue is another factor which participants highlight, especially in its influence on the need to push the boundaries around the use of images and messages and to grab attention. One person suggested that *"the people who are responsible for keeping that pipeline of funding coming in have to be very carefully in tune with public sentiment. I think that donor fatigue is driving quite a bit of that change. There's more need than ever and there's more competition for a fairly scarce amount of public funding and donor support."* (Paula – 3) For Elisha – 2, the question is *"how do we reframe the message to overcome donor fatigue? How do we use the voices of beneficiaries more? This is stuff that we know needs to be done and we're challenging ourselves to do it, we're not in denial of that so, yeah, we're trying to push the bar more and more with it."*

Alongside growing awareness of the needs of different donors, one person talked about the levels of research that are applied by fundraisers in trying to understand what works and *"the blockers to why people do or don't give or would consider giving to an international NGO"* (Ruth – 2). For her, understanding that people feel distant from global issues, that they don't see the impact that NGDOs have made and that local organisations are more likely to help people feel part of a community, emphasises the importance of having *"one story and many voices… you can still have the one story you're trying to get across but the language you use and the way you tell it, and which way you come at it can be very different"* (Ruth – 2).

Shift to Domestic Concerns

Elisha – 2 also links donor fatigue to a shift away from support for global development issues towards more domestic concerns:

> *"people don't understand, they see it as a black hole, we're sending all this money, we see no effect, giving them an understanding of why this is a constant issue, why we need to fundraise…. because donor fatigue is there, things were catching the headlines were a lot easier 10 years ago in relation to international development than what they are today, so what do we need to do differently to continue to raise awareness and to make sure that it's still seen as important cause, because that's falling off, its relevance is falling off, we see that in the research of people shifting focus to domestic charities. We're losing that ground of attention from the Irish audience, so reframing the narrative in a fresh way is important and necessary."*

Arthur – 1 agreed that

> "With COVID and all that but prior to that homelessness from 2016 – 2019 was the biggest issue in the country. I think that shifted people's focus to domestic issues as well. I think it's never been harder to get coverage. Trying to get that cut through is an added challenge now when you're trying to raise X million euro each year… in a crowded market and shift to domestic issues."

Jack – 2 explained that

> "CEOs are under pressure too in terms of fundraising. They've got extremely ambitious, tough fundraising targets that need to be hit… One of the things we've really noticed, it started in the last recession, but it's really accelerated, there's such a shift to domestic issues in media and in people's own mind. It's a lot more difficult to get coverage now for international issues than it was 10 years ago on a PR basis and that's because, when we were approaching media at Christmas, several organisations were explicit that they were only going to cover domestic charity issues. We wouldn't have heard it in such an explicit tone before."

Crowded Fundraising 'Market'

Thus, though donor fatigue and the 'crowded market' present NGDO fundraisers with challenges around developing more creative ways of engaging different audiences, this can work in favour of more creative and ethical communications or against them, depending, as we have seen above on 'what works' and what organisations see as the purpose and role of fundraising in that context. The difficulty arises, some participants argue, for small organisations trying to 'compete' with bigger ones, especially when bigger ones push the boundaries beyond ethics, and with growing numbers of 'global competitors' in the Irish fundraising market. Chloe – 1 explained that

> "the market is so much more competitive, there's so many others in the mix now and digital makes it easy for organisations to market across borders. And even ourselves, we're looking at marketing inside countries like Sweden, and countries that are not what you'd expect to be our typical market or whatever. But even you see, one of the organisations that you see in your feed showing some of the emaciated children is the World Food Programme (WFP), so you're kind of going if WFP is putting out messaging like that, how do other NGOs and small NGOs compete with that?"

While pressure is coming from this increasingly competitive and crowded fundraising 'market', it is also coming from within organisations or internationally, e.g., one person highlighted that

> *"the targets for an international organisation are set internationally, and they're very high and they are predominantly income based. So there would be a certain amount of money or KPIs in a year. Achieving them is extremely challenging. What fundraising would say is that in order to do that we must resort to those tried and trusted methods. On the other side, when I wear my comms hat, what I would try to do, the counter approach, is to grow our brand, we would try to do that through positive associations." (Emma – 2).*

These, in addition to work pressure, mean that *"the way jobs are structured and pressures that are on them, the pitch they're working to"* (Zoe – 4) all makes having the time to stop and pause and consider what's done in fundraising very difficult.

Institutional Donors

Institutional donors were identified as becoming increasingly significant in shaping communications. In the Irish context, a few people mentioned the role that Irish Aid is playing or could play in shaping communications. One person explained that institutional donors are *"having an increasingly big role"* (Arthur – 1). Referring to matching funding that DfID has given for projects in certain countries and how this can shape advertising, alongside the emphasis in Irish Aid civil society programme funding on public engagement, one person explained that *"we're all learning what they're looking for… they really want the impact of not just Irish Aid but of development as a whole and particularly Ireland's overseas aid programme. They want that coming out a lot clearer."* (Arthur – 1) For those in development education Irish Aid is always a consideration and *"there's always that feeling that Irish Aid has real power over us as organisations and what we communicate in terms of being cautious, in terms of challenging"* (Joyce – 4). Another highlighted the role that Irish Aid or other institutional donors might be able to play in supporting organisations to move towards more ethical communications. As he put it,

> *"if our ambition or objective is to genuinely change attitudes and perceptions then the implication of that is that communications will change by INGOs and the implications of that is that funding will potentially be reduced. And to fill that gap, institutional donors have a role to play there. So I would say that's probably how they should, but they're not getting off lightly, they can play a key role in enabling that transition." (Jack – 2)*

Organisational Culture, Strategy and Leadership

As indicated above, though many participants highlighted the significant influence that fundraising imperatives and practices have on communication styles and approaches, the influence of organisational culture, strategies and leadership also emerged. Culture overlaps with traditional fundraising practices identified above but it is not confined to them. When asked what is driving

NGDO communications, Victor – 1 said that *"culture is huge… I've heard people say, 'no that's not us', 'we won't use that image'… maybe other organisations would but 'we're not going to take that approach, that's too undignified'."* One person explained the influence of organisational identity and culture in terms of the organisation's mandate, as staff seeing themselves as fulfilling that mandate, as part of the organisation. They *"stay for the long-term, do lots of work, the theory of change, that's embedded in everybody who comes and who wants to work in X"* (Ruth – 2). For two others, organisational culture has an effect in that *"things keep happening that way because that's the way they've always happened"* (Mary – 4) or *"for some organisations, it's just a pattern – this is the way we do things, this is our tradition, it hasn't moved on… so I think some of it is a kind of an organisational culture thing and you have to be really brave… I think some of it is a tradition or habit rather than really interrogating how we're doing things"* (Faith – 4).

Brand and Strategy

A number of research participants talked about the ways in which their organisation's brand or strategic plan or theory of change influenced different aspects of their communications. These, aligned with the leadership of senior management or the pressure they are under can lead to shifts in the direction of an organisations' mission and communications or hesitancy to take risks, especially when financial outcomes are on the line. One person described how the organisation's *"global CEO… she's very much put gender equality to the heart of the organisation's agenda, partly because of her, it's just fed out through the rest of the organisation"* (Dom – 1). A similar point was made from someone in a different organisation, *"I think leadership from the top is really important in terms of the CEO the CEO as a spokesperson, being able to speak from a place that's ethical and empowering, gives space to people who are disempowered as well which is great"* (Victor – 1). Another expressed that she would *"love to see the head of fundraising taking real risks"* (Joyce – 4) and another that *"I think from a CEO level, you've probably got a lot of CEOs who want to have a different fundraising strategy but you've got a fundraising director saying that's fine but you'd be down 4 million and that probably focuses the mind of the CEO"* (Arthur – 1).

Global Communications and Media Context

Media Saturation

Many research participants mentioned the benefits and challenges related to 'media saturation', 'the greater presence of social media' or the 'bombardment' by social media. From a positive point of view, it was seen to offer more opportunities for NGDOs to get out their message, offering multiple sources of news and a chance to, as Alice – 1 said, *"tell more stories and go a bit deeper. Even things that are successful on facebook, if it's the person speaking, that's often more successful."* Where some communications staff talked about the limits and challenges of the *"very bite sized, click baity, image, one paragraph, video"* (Charles – 3) associated with social media, others highlighted that they can advance more empowerment messages through it. Chloe – 1 described her organisation's social media messaging as follows: *"I would say some of our stuff is very progressive. We've kind of, a lot of what we're doing on social media is really upbeat. It's inspirational. We're conscious of connecting with the younger audience as well. It's upbeat, progressive."* She also identified the challenges related to the *"snippets like with social media when there's just a picture on Instagram",* but went on to say that *"even there where we put a picture up, you'll see below the picture a lot more context and information and fill out to the story"* (Chloe – 1).

Getting Attention

The challenges of getting people's attention and holding it through social media were described as significant with concerns about knowing what messages 'can land' with different audiences. In this world where people can 'access media all the time' (Hugh – 4), *"access to information is so distracted"* (Freja – 3), and *"none of us are limited to one source of information anymore"* (Freja – 3). As Charles – 3 described it,

> *"we should have a responsibility to educate the public that the world is much more nuanced than black people in Africa are poor because the charity givers haven't done enough. The reality in a communication context is sometimes, and it's another expression, 'if you're explaining, you're losing'. The audience has a limited amount of time and how you do things over social media…. Now we know from the algorithms, because digital is very smart, anything over 40 seconds the audience drops away unless they're gripped because there's too much in their feed. If you want attention, you have to go where they are and how they get information. So you need to be messaging in a fairly concise fashion."*

Professional Practice

The professionalisation of practice around using digital and social media communications has led, some participants believe, to a situation where, according to one participant, *"things have gotten more about marketing, social marketing… everything has had to become more social media savvy… everything has to be quick… everything has to be counted, how many hits on this, impressions on that"* (Mary – 4). This has opened up markets for fundraising, discussed below, where

> *"people are getting bombarded by pleas for support. I think part of that bombardment is obviously the greater presence of social media and people being online. It used to be every now and again you'd get a letter in the mail, there would be the odd appeal, now it's every day you're getting targeted with adds on social media and websites." (Paula – 3)*

At the same time, she argues,

> *"I think savvy marketeers and fundraisers have to be aware that their messaging can't be filled with hammer all the time. You have to be giving your intended audience some reason to have hope and it's worth it. That it's not just another disaster, more starving children, more upheaval, I think people get desensitised to it." (Paula – 3)*

Mainstream Media and PR

Concerns about the continued influence of mainstream media and PR agencies were also raised by a few participants who highlighted their tendency to *"go for the most graphic images. They go for the real, real need, so the minute any issues like this comes up on TV, like you look at Yemen, Syria, they go for the traditional images because they know that will cut through that emotional and will connect with people. They're not thinking about the issues we grapple with."* (Ruth – 2) One person had a similar view about PR agencies, describing them as quite

> *"prescriptive about what comms should look like and they are not interested in talking about power or marginalisation or structural issues. They are interested in charitable frames and transactional stuff that's very simplistic and gets their message across. Because their training around PR… is coming from a different world view than those of us, let's say, who would be coming from education or development studies or equality studies. It's a very different field and I think it is very influential."* (Hugh – 4)

Influence of The Black Lives Matter Movement

The influence of social media on spreading concern for issues such as racism or climate change was a point raised by many research participants. Highlighting, in particular, the influence of the Black Lives Matter movement on raising consciousness around the *"white saviour narrative"* (Chloe – 1) and around voice, *"who can speak for who?"* (Zoe – 4), one person, for example, explained that

> *"we've seen in 2020, there has been a change in the way people respond to the imagery. In the beginning of the year when we launched the TV campaign, we nearly didn't get any kind of response to the imagery that was used. At some point, when BLM was very prominent in our daily lives, we saw a huge increase in responses and that was a very interesting moment. It created a new moment to reflect about the imagery that you use and whether or not it's appropriate."* (Adrian – 2)

He went on to point out that that organisation had to

> *"upskill our moderation capacity… what was really striking was that the kind of responses we got became more outspoken… no longer limited to Ireland…. When you go on FB anyone, anywhere in the world can respond. What we saw is that all of a sudden, we were moderating with people in Washington DC, people in Africa and it had a different dimension. All of a sudden, you kind of notice that you're part of something global rather than local."* (Adrian – 2)

Despite this positive view of the influence of BLM, another participant argued that a lot more needs to be done to ensure that *"instead of talking for others… it would be great to hear from those directly who are facing those challenges rather than the person who works for the Irish NGO"* (Hugh – 4).

A point emerged in one of the focus group discussions for NGDOs to be cautious of their assumption that they can control or set the agenda around what people read or respond to (Sadie – 54). Describing NGDO presumptions around being 'gatekeepers' of messages, this re-emerged in an interview with Zoe-4: *"as if we're gatekeepers, gosh, and being wise to the savviness of young people because they're living in these image saturated communication contexts. They have a new literacy around this stuff."* For another participant,

> *"the BLM whole thing blew up around the world and that's coming through to the forefront… I mean we get called out a lot even showing a child at all, a fully dressed happy child… because they're black, you're seen as showing that all black people are poor. But they are issues and they're the people we work with. I mean what role do we, as INGOs, have to change the whole narrative in society? … how do we do the work and support the people we work with, because that's our job? … but the whole world is changing and there's lots of different elements and different people but where do we fit in? And are we perpetuating those issues still? But how can we do it? Ultimately, you could say you could do it without showing those images but we're trying to go that route without really affecting the income. You can't move overnight and just change everything."* (Ruth – 2)

The influence of BLM seems to have encouraged reflection, the need to respond to getting 'called out' on their use of images and, in some cases to support change in organisational communication narratives. One person highlighted, for example, that

> *"it inspires us to think beyond codes of conduct that we have to respond to anyway. We are inspired to go two, three steps further, and makes sure on the one hand that we upset as few people as possible and on the other, we try to show an environment that is more relevant for the work we do… As the world is changing so do you have to change. Sometimes that is only happening when that comes from the outside and I guess, this year, we've definitely faced those moments."* (Adrian – 2)

The counterpoint to social media helping to raise NGDO sensitivities to diversity and anti-racism has come, according to some participants, in the form of its influence on growing populism around the world and its pressure on people to become more nationalistic, racist and exclusionary. While participants do not subscribe to such perspectives, some fear backlash and the influence of 'local first' narratives on their ability to promote global solidarity. One research participant highlighted that *"there's always, I guess, the backlash of we should protect our own first… if we put up an ad in social media…, you'll always see one or two comments like 'what about the homeless in Ireland?... my point is that I am noticing a lot more of those kinds of comments on FB and on social media."*

(Laura – 2) Another talked about the growth of the populist view as *"a small group who are growing very fast and far and usually they open a door for people to walk through in the years after… it's empowering people to say things they probably wouldn't have 5 years ago."* (Jack – 2)

Organisational Tensions around GD Communications

A number of organisational tensions emerge in the findings around GD communications both within and between NGDOs. While these cover many aspects of GD communications, significant among them are tensions in representational practices between NGDO fundraising targets and requirements on the one hand and the need to communicate complexity, context and agency on the other (as discussed in Section 2). Here I focus on the organisational dimensions of these tensions. Some of these are seen to reflect the relative priorities attached to fundraising and/or public engagement, whereas others relate to different power positions and relationships across organisations, e.g., between fundraising and campaigning, advocacy and education, or between fundraising and *"programmes people"* (Izzy – 3), who Victor – 1 sees as the *"very ethical principled programme people who would probably rather there would be no public engagement work whatsoever"*. As such, they overlap with different responsibilities different staff have and different relationships NGDOs have with institutional and individual donors, members, supporters and/or activists and with each other.

Tensions In All NGDOs

The inevitability of tensions is outlined with Jack – 2 explaining that "*that's just the nature of it"*. Alice – 1 explained that *"there is always some fundraising communication that I'd be uncomfortable with. I think there's always going to be that tension".* Though tensions between fundraising imperatives 'on one side' and the work of DE, campaigning and advocacy (and sometimes communication or public engagement) 'on the other', were commonly referred to, sometimes these are constructed between the type of communications involve. At others, in NGDOs, it is between *"different departments in organisations"* (Jack – 2). Some of these issues were captured by Emma – 2 who commented: *"you'll get those conflicts, so it's like both sides are defending their interests. So I suppose it's to be expected, you'd want that cut and thrust, so that always the coms and advocacy side of the house is trying to push back, what we're trying to do is achieve a power balance but it doesn't always work".* It was described by Joyce – 4 in the following terms:

> *"there's a lot of tension in all agencies about fundraising and the department I'm working in… I do understand the other team has a different brief, and they're using the means that have been proven to work that I don't happen to agree with always. I think we could be much braver… in terms of targeting people, but I have no influence on that."*

Fundraisers Under Pressure

There is a recognition among all research participants that fundraising professionals are under different pressures to others working in NGDOs. Ruth – 2 explained that *"fundraising is very exposing, internally… what gets measured gets done and that's what people talk about because that's what funds the organisation… the KPIs".* Arthur – 1 described that

> *"we're all under enormous pressure to bring in donations and all the research shows what brings in donations. If you were to run an organisation that only wanted to bring in money and didn't have any ethical standards, you would be doing completely different to what we do now. And likewise, if you were trying to run an organisation that was just trying to communicate on development issues and didn't have to bring in money, you'd also be doing advertising a lot differently. So it's trying to strike a balance."*

From an educator's point of view, Joyce – 4 believes that

> *"it's so much easier to prove your impact and worth of a team if you bring in funds, maybe we're not good enough in our side of things at proving impact that we're having… we can always blame fundraising, and say they're undermining all our messages, but really, we're not tactical or strategic enough in changing people's minds. We just keep repeating the same morally superior messages that don't seem to change."*

Oscar – 1 recognised, as others do, that his area of communications work is different to fundraising, which he said, *"has a harder job. You have to convince people to donate money. I have to try to get our media shared or to get past an editor, so I often deal with quite newsy things and that itself has a certain appeal value. I'm not just pulling on heartstrings and that fundraising role that some of us rely on for our salaries is often what causes most concern."*

Conversations in NGDOs

Talk of tensions and conflict within organisations can belie the fact that staff from different departments within bigger organisations or those working in smaller organisations are regularly in 'dialogue' with or having 'conversations' with each other. Within smaller organisations, decisions around messaging and campaigns are often made by one or two people. Larger organisations have processes in place to ensure that different interests are reflected in decision-making around communications, and are more formalised than in smaller organisations. Jack – 2 explained that, in his organisation, the senior management team (SMT) are *"the critical group here, of development, sign off, governance, oversight in terms of how we communicate with all of our important stakeholder groups"*. Arthur – 1 explained that *"for our big campaigns with massive above the line advertising… there's a stricter governance process on that. We have a project board which would include myself, senior public engagement and senior fundraising staff and between us and working with our international colleagues, we'd determine what is the theme of the campaign"*. The same applies for Chloe – 1's organisation where she explained that

> " *"rarely does anyone make a decision in isolation in X. We work collaboratively across teams to decide things. A good example would be the DRTV ad that X uses. We have an internal steering committee that has oversight on that so I'm on that. Fundraising will develop their own campaigns. I have developed the organisational brand and messaging guidelines, so fundraising would work from those guidelines when they are developing their campaigns."* "

'All for One and One for All'

Tensions within the broader sector, and around the influence of one organisation's communication practices on others, are also highlighted by participants who identify the importance of all organisations communicating ethically. Jack – 2, for example, acknowledges tensions between *"portraying people in certain instances and with dignity and what will, from a fundraising point of view, ensure income goal"*. He went on to argue that

> " *"if everybody was abiding by the code, it would be a great start because it would lift everyone up to a certain threshold, that helps to deliver different perceptions around what quality is… But if you have some organisations that are what we consider abusing the code or the principles within it, that is a race to the bottom in some ways and it can be quite challenging then for organisations who won't go there as it may impact on their fundraising."* "

Emma – 2 discussed the fact that though organisations are *"working towards broadly the same goals … you're set up in competition with other organisations because we're all working towards these targets around finance"*. She believes that *"it would make a lot more sense in terms of efficiency if we were all to come together, that sort of cumbya stuff, you know, but it doesn't work that way"*. Though some organisations have recently come together around humanitarian funding in the form of the Irish Humanitarian Alliance, Freja – 3 highlighted the enduring power of some of the

bigger organisations in the sector. Because *"their story generates X million a year, therefore they are allowed to do lots of things that they want to"*.

Jack – 2 explained that fundraisers are often stuck in a bind of the pressure to meet financial targets using communication strategies that work, which are often contrary to *"what is likely to be a more effective way of changing deep set attitudes and perceptions of what poverty actually is, its causes, potential solutions and the role we can play in that"*. Like others, he related some of this to the importance of organisations securing unrestricted income. In Jack – 2's case, he suggested that it would be great if someone or *"something came to the table that offered a pathway that secured financial security but also offered a way to reform what comms looks like, I think there would be a strong appetite for it"*.

Summary of Research Participant Findings re: Drivers

Fundraising emerges as a significant driver of NGDO communications in this research, with concerns over the competitive fundraising market seen to constrain ethical practice. This is identified as important beside the need for sophisticated communications to counteract donor fatigue, the risks of taking risks with new communication styles and the shift to domestic concerns. The role of institutional donors is also highlighted in supporting organisations, including through filling any fundraising gaps which might emerge from more ethical communications practices. Organisational culture, strategy and leadership are also discussed by research participants, as is media saturation and getting attention in that context; the professionalisation of media practice; and challenges from mainstream media and PR. The Black Lives Matter movement is cited as playing a very positive role in stimulating conversations around ethical communications, in holding NGDOs to account, and in shifting them towards EDI and decolonising communications. In terms of the GD sector in Ireland, organisational tensions are reflected upon by participants in general around roles and responsibilities and fundraising and complexity. While acknowledging that fundraisers are under pressure, the need for conversations within NGDOs, and a collective approach within the sector, are highlighted.

Section 4:
Accountability and Codes of Good Practice – The Dóchas Code

Section 4:
Accountability and Codes of Good Practice – The Dóchas Code

Existing Research

Supporting Ethical Communications – Accountability and Codes of Good Practice

We have seen in Section 3 that one of the influences on GD communications has been the drive towards aid effectiveness and professionalism within the NGDO sector. As cemented in Busan (2011), this is understood in terms of measurement for results, accountability and transparency, and there is a growing focus on localisation, shared responsibility and participation. Various standards and codes of good practice have been introduced to support these processes. Some of these are based on self-regulation, whereas others reflect more formally institutionalised regulation. These are growing in significance and influence, with many designed to control civil society (CIVICUS, 2021). Where they are more benign, they are designed to ensure financial accountability and legal practice by organisations and businesses across a range of areas of organisational life and to prevent fraud, abuse and misconduct on the part of those associated with NGDOs. These include the General Data Protection Regulation (GDPR) 2016/679, which came into effect in 2018, as a regulation in EU law on data protection and privacy in the European Union and the European Economic Area. In Ireland, the Charities Act (2009) paved the way for the appointment of a Charities Regulator in 2014 as an independent authority and Ireland's national statutory regulator for charitable organisations. The Charities Governance Code explains the minimum standards charities and organisations should meet to effectively manage and control their charity. The Code sets out the 32 core standards that all charities should meet when putting the principles into action. It also contains 17 additional standards that reflect best practice for charities with high levels of income and/or complex organisational and funding structures and/or significant numbers of employees. More information on the Charities Governance Code is available in Box 2.

Box 2: The Charities Governance Code and Fundraising Guidelines – Ireland

The Charities Governance Code is a code for charity, or in this case, NGDO trustees, i.e., board members or directors, which outlines the minimum standards organisations "should meet to effectively manage and control your charity. Good governance involves putting in place systems and processes to ensure that your charity achieves its charitable objectives with integrity and is managed in an effective, efficient, accountable and transparent way" (Charities Regulator, no date: 5 – downloaded from: https://www.charitiesregulator.ie/media/1609/charities-governance-code.pdf 19th Aug 2021). It is made up of six principles – advancing behaving with leading people its charitable integrity purpose; behaving with integrity; leading people; exercising control; working effectively; and being accountable and transparent.

In terms of communications, minimum requirements are extremely limited. Among the points made in relation to transparency and accountability, organisations are required to publish the name of their organisation, for example, on their website, to "identify your stakeholders and decide how you will communicate with them", make sure they have a procedure for dealing with queries, comments and complaints and following requirements of their funders (Charities Regulator, no date as above: 25).

Box 2: The Charities Governance Code and Fundraising Guidelines – Ireland – *contd*

Though specific guidelines around communication are scant, the Charities Regulator has published 'Guidelines for Charitable Organisations on Fundraising from the Public (https://www.charitiesregulator.ie/media/1083/guidance-for-fundraising-english.pdf). Drafted as guidelines on the basis of public consultation in 2016, a number of expectations are outlined. This includes the following statements: "The Charities Regulator expects that any charities that fundraise will do so in a way which protects the reputations of their charity and encourages public trust and confidence in their charity and in charities more generally. This includes following the law and recognised standards, protecting the charity from undue risk and showing respect for beneficiaries, donors and the public. These Guidelines are intended to assist trustees of a charity to run the charity effectively, avoid difficulties in respect of fundraising activities and comply with their legal duties. Charities vary in terms of their size and activities. Trustees should consider and decide how best to apply these Guidelines to their charity's particular circumstances. The Charities Regulator requires the trustees of each registered Irish charity to be able to explain and justify their approach to fundraising from the public, particularly if they decide not to follow good practice as set out in these Guidelines" (no date: 5).

Though these are guidelines, rather than requirements, and they are quite general, they do encourage NGDOs to fundraise in a way which supports the principles and commitments agreed in the Dóchas Code.

Guidelines outline that "charity trustees should ensure that their charity has a Donor's Charter, which should include the commitments set out below and should be publicly available. The charity may expand on these commitments in accordance with its mission and purpose as appropriate". The Three minimum commitments are (no date: 7)

Respect – All fundraising will respect the rights and dignity of donors, beneficiaries and the public. Fundraising activities will not be unreasonably persistent, intrusive or place undue pressure on people to donate. Should someone not wish to donate, or wish to cease making a donation, that decision will be respected. Beneficiaries will not be presented in a disrespectful way in promotional activities and, where possible and appropriate, clients and beneficiaries will have an input into the promotional strategies of the charity.

Honesty and Integrity – Fundraising will occur in an honest and truthful manner. Fundraisers will act with integrity and not misrepresent the charity, its need for funds or how they will be applied. Questions about fundraising activities and fundraising costs will be answered honestly and in a timely manner. Information about the charity's charitable purpose and activities will be made freely available. Charitable donations and gifts will be used for the purposes for which they were donated.

Transparency and Accountability – The charity will take responsibility for its actions and will be capable of explaining, clarifying and justifying those actions. The charity's trustees and management will explain and account to donors and the public for the charity's actions. The charity will operate in an open, frank and honest way and will ensure that transactions, operations, information and communications are easily understood by donors and the public alike. The charity will clearly identify to donors and the public the cause for which the fundraising is occurring and how donations will and are being used. The charity will provide ways whereby those interested can easily contact the charity. The charity will have a procedure in place to address complaints.

In terms of reporting, "Under the Charities Act 2009, every charity registered in the Republic of Ireland is required to submit an Annual Report to the Charities Regulator no later than ten months after the charity's financial year end date" (Information Note Charities Governance Code – Reporting on Compliance in 2021: 5). In filing its annual report, it is required to declare whether or not it is fully compliant with the Charities Governance Code, partially complaint or it has not started implementing it.

While the Charities Act requirements and Governance Code are important additions to the regulation space in Ireland, and the principles set out in the fundraising guidelines are congruent with those of the Dóchas Code, as the Dóchas Code is an example of peer regulation, I focus on its benefits and weaknesses as well as examples of it below.

Accountability and Self-Regulation of NGDOs[1]

Denis Kennedy situates the rise of self-regulation as a form of accountability in the context of a "crisis of legitimacy" (Kennedy, 2019a; 2018), which he attributes partly to the perceived failure of humanitarian organisations in the Rwandan crisis and the need to ensure such failures did not occur again. Products of these reflections were the Humanitarian Accountability Partnership (HAP) and the Sphere Standards, which were subsumed under the Core Humanitarian Standard in 2014. Crack (2014: 2) argues that the Rwandan crisis was not the only factor involved as NGDOs began to be exposed to "allegations of corruption, incompetence and abuse of power". As NGDOs faced growing criticism and crises of legitimacy, and as trust levels fell, Kennedy (2019) argues that good intentions were no longer considered to be enough. Thus, a more concerted effort was put in place to construct mechanisms which would make NGDO accountability more professional and transparent. Schmitz (2012) outlines how the rise of accountability debates led to a questioning of what accountability is, to whom accountability is owed and how this accountability should be implemented. Traditionally, accountability was associated with "upward accountability", or accountability to donors (Crack, 2014; Coule, 2015; van Zyle, 2019; Kennedy, 2019b).

Scholars understand upward accountability to be based upon a "principal-agent" form of relationship (Prakash and Gugerty, 2010; Crack, 2014: Coule, 2015; Deloffre, 2016; Kennedy, 2019b; Van Zyle, 2019) which "approaches accountability as a mechanism of control between a principal who has delegated responsibilities to an agent" (Berghmans et al, 2017: 1532). Simplistically understood, the principals are donors and the agents are the NGDOs. However, researchers have questioned the appropriateness of such a controlled and one dimensional understanding of accountability because NGDOs have many relationships, not all of which fit easily into the principal-agent form (Crack, 2014; Deloffre, 2016; Berghmans, 2017). Those influenced by participatory approaches to GD acknowledge that an over-emphasis on 'upward accountability' was anathema to their efforts to challenge existing unequal power relations in development. Understandings of accountability were therefore pluralised with the articulation of the value of "downwards" accountability to communities involved in development, "internal" accountability to staff, members and/or management, and "peer accountability" to other NGDOs involved in GD (Schmitz, 2012; Berghmans, 2017). These early articulations of different forms of accountability have become commonly accepted, with NGDOs regularly acknowledging multiple stakeholders – governments, donors, the general public, staff and other organisations. At the same time, many acknowledge the on-going tendency to conflate

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1   This section was written substantially by Gerard Ellul.

accountability to 'accounting to donors' and the challenges involved in moving beyond 'tick box' accountability with regard to regulatory frameworks.

The key question here is how can NGDOs help to create a climate which enables different actors and stakeholders to hold them to account on their communications? And what kind of regulation, standards and/or code can support it?

'Industry' Standards and Codes

NGDOs in Ireland are signatories to a range of global 'industry' or sector standards, such as the CHS. They are also party to a range of codes of good practice agreed within the Irish GD sector[2]. Organisations also have their own codes of good practice on various themes[3]. In addition to these types of codes, which generally try to advance 'good practice' or agreed standards in a particular area, many organisations have developed or follow a range of guidelines around different topics, e.g., brand guidelines, guidelines on using photographs[4].

Peer Regulation and Codes of Good Practice

Given the focus in this research on the Dóchas Code, it is important to explore what's involved in different forms of peer regulation and their associated standards and implementation mechanisms. Crack (2014: 2) explains that "peer regulation is the process whereby a sector level organization promotes common standards of quality and accountability for NGOs. NGOs may volunteer to adhere to these standards, but they are not under any legal obligation. Peer-regulation ranges from aspirational codes of conduct, to certification initiatives with robust verification procedures" .

'Like a Club'

Prakash and Gugerty (2010) use the principal-agent model to suggest that a "club" framework can be a way of understanding how NGDOs can be accountable using peer regulation within the NGDO sector. Membership in clubs require the acceptance of a set of rules but the benefits are branding, reputation, and possibly some funding opportunities. Deloffre (2016) explains that accountability clubs are based on "pre-determined standards expressed through a specific contract to enable the evaluation of performance, outputs, efficiency or effectiveness" (Deloffre, 2016: 733). These can be weak or strong standards and they can be matched by weak to strong enforcement mechanisms

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2   These include Dóchas codes, such as The Dóchas Safeguarding Code (https://www.dochas.ie/assets/Files/Dochas_ Safeguarding_Code.pdf); The Dóchas Charter (https://www.dochas.ie/assets/Files/Dochas_Safeguarding_Code.pdf); and the Dóchas Code of Conduct on Images and Messages (https://www.dochas.ie/assets/Files/Code_of_Conduct_ on_Images_and_Messages.pdf). They also include the Comhlámh Code of Good Practice for Voluntary Sending Agencies (https://comhlamh.org/code-of-good-practice/) and the IDEA Code of Good Practice for Development Education (https://www.ideaonline.ie/Code-of-good-practice-development-education).

3   For example, according to its website, Concern Worldwide has the following codes: a staff code; a donor supporter charter; an anti-fraud policy and a whistleblowing policy. Among Trócaire's many governance policies and codes, they mention safeguarding, child safeguarding, a counter modern slavery and traffic in persons statement, a policy for communicating with supporters who may be vulnerable and a carbon footprint policy (https://www.trocaire.org/ about/accountability/). Again, as an example, Concern has the following governance codes: The Charities Regulator Governance Code; the Irish Development NGOs Code of Corporate Governance; the Governance Code for the Community and Voluntary Sector, the following 'industry codes': the Dóchas Code of Conduct on Images and Messages; the Disaster Relief Code of Conduct, the Core Humanitarian Standard; and the following 'fundraising codes', The Code of Practice for Face to Face Fundraising; and the Charities Regulator Fundraising Guidelines (https://www.concern.net/accountability/codes-and-policies 2021).

4   https://www.trocaire.org/sites/default/files/education/lent2015/photo-activities-trocaire.pdf

(Prakash and Gugerty, 2010: 37-38). Such an approach suggests that the strength of these self-regulatory, peer mechanisms lies not only in the standards themselves but in the regulatory and enforcement mechanisms associated with them. At the same time, other factors may also be important, perhaps related to a sense of ownership around the agreed standards or understanding and knowledge of how they might be implemented.

How to Enforce Peer Regulation

Some researchers have explored how codes can be more rigorously enforced, examining the effects of regulatory mechanisms that are based on the principal-agent approach, for example, where donors ensure the implementation of good practice codes or guidelines through enforcement. In this case, a growing body of research points to the principal-agent perspective being too limited and narrow a concept to understand the complexity of NGO accountability (Deloffre, 2016; Berghmans, 2017; Kennedy, 2019b). A constructivist perspective builds on "a process of mutual negotiations between different NGDO stakeholders who hold different accountability demands" (Berghmans, 2017: 1529). The traditional model relies on the legal and financial power that donors or governments have over an organization. This leads to accountability being a "a reactive and punitive process where an authority evaluates the performance, outcomes, outputs, or actions taken by an organisation and imposes sanctions if dissatisfied with the results" (Deloffre, 2016: 727). A different model is suggested which far better suits the global relationships which an NGDO is part of, which involves a mutual accountability between groups based on shared values, trust, negotiation and consensus. "Actors comply with the requirements of mutual accountability out of a felt responsibility to themselves and others rather than in response to legal obligation. Sanctions for violating the compact are reputational and relationship-based, including a loss of valued relationships and a decline in social status" (Deloffre, 2016: 728).

Mutual Accountability

The key distinguishing feature in the mutual accountability model is that it considers accountability as a "practice, rather than a mechanism of control" (Deloffre, 2016: 731). This tends to create an environment of mutual engagement, a shared interest in learning and improving practice. As this occurs more and more, the organizations involved "intensify social ties, build channels of communication, build trust and create a sense of mutual accountability. Social learning, therefore, creates communities that are naturally self-incentivizing: members tend to stay involved and invested in communities of practice because of the inherent rewards of social learning and collaboration" (Deloffre, 2016: 731).

While peer or mutual accountability can build ownership among those who are 'part of the club', if the club is exclusive, it may be based on the interests of elites, or at least of the few. Similarly, as Deloffre (2016) suggests, there is a need for ongoing engagement, learning, conversations and collaboration around the terms of the agreement in order to ensure ongoing participation, and that codes are updated and renewed in the light of changing and challenging circumstances.

Research on peer regulation among NGDOs (see Appendix 4) (Clark 2013, 2018; Deloffre, 2016 and Kennedy, 2019) focuses mainly on regulation around humanitarianism but it presents some interesting insights for our purposes here. Mutual accountability approaches, which tend to be favoured by NGDO staff, with their opportunities for peer support and mutual learning etc, are seen to support more organisational 'buy-in' and mutual learning. In that case, where there is a strong emphasis on rigorous processes for certification, the mechanism seems to have more credibility but it can foster a tendency towards 'tick box' compliance.

The existing research seems to support the idea that peer accountability within NGOs, is best practiced where there are:

- Participatory models of dialogue in order to come to agreed standards and values

- Models of accountability which are based on practice rather than on a mechanism of control

- Relationships between NGOs are building trust and cooperation through opportunities for ongoing learning

- Limited bureaucratic processes involved in the reporting of compliance

- Reporting processes being open and transparent and not based on fear of losing certification or reputation but rather moments for the organization to improve performance

- Strong levels of 'buy-in' by all levels within the organization and not just those responsible for parts of the organization's operations (e.g policy or fundraising or advocacy)

- Processes move away from a technocratic approach to policy and compliance. It is important to increase the opportunities for organisations to participate, in an ongoing way, in reviewing established standards in order that underlying values and best practices can be shared and a consensus reached on a more updated set of standards which are owned by the membership. In order that this review/dialogue process be fruitful, the organisation should be represented by key different departments, which may cause debate – e.g. the education/advocacy; policy; fundraising; communications departments. It is through the patient, respectful and facilitated process of disagreement, struggle and contestation that a more lasting consensus ("buy-in") can be achieved.

- A representative group is set up to support mutual learning for organisations, the purpose of which is to build trust and cooperation between the members and to devise methods of peer regulation, compliance, support and reporting which enhances transparency and momentum for change. This is not a 'policing' body but one which supports an environment of openness and critical reflection.

Summary of Existing Research – Accountability and Codes

The drive towards aid effectiveness, with its emphasis on accountability, transparency and measurement for results, has become an important element of NGDO good governance measures in recent years. This has translated, among other things, into an increasing range of industry and organisational standards, and different forms of peer regulation mechanisms. Existing research on accountability highlights different approaches and priorities, and research on peer regulation indicates its strengths and weaknesses. The value of forms of mutual accountability is highlighted as building ownership, while the need for more than technocratic approaches to regulation are stresses.

Codes in the Irish GD Sector

Though the research on different codes of good practice in the Irish sector is limited to date, these peer accountability mechanisms are applied in the case of the Comhlámh Volunteer Charter and Code for Volunteer Sending Agencies and the IDEA Code on Development Education. These are explained in Box 3 – Examples of Peer Regulation and Mutual Codes of Good Practice in Ireland. The Dóchas Code is also an example of a peer-regulation code involving mutual accountability. In this section I focus on the successes and challenges of its implementation. In Section 5, we return to a discussion of regulation around ethical communications more broadly.

Box 3: Examples of Peer Regulation and Mutual Codes of Good Practice in Ireland

Comhlámh Code of Good Practice and Volunteer Charter

Comhlámh's Code of Good Practice is a set of standards for Irish Volunteer Sending Agencies facilitating international placements. The Code is based on a vision of volunteers working in solidarity for a just, equitable and sustainable world and it promotes responsible and responsive volunteering to ensure a positive impact for the overseas project and community, the volunteer and the sending agency.

The Code supports volunteer programmes to be led by a belief in global justice, to be based on good development practice and to address identified needs in partnership with local projects and communities. The Code promotes development education, which enables people to more deeply understand the world around them and to address the root causes of inequality and poverty.

Every Volunteer Sending Agency, which is party to the Code of Good Practice, commits to the implementation of the Code's five values that underpin the work of international volunteer programmes. Under each value, there are a set of principles and indicators which provide guidance for the development and implementation of volunteer sending programmes.

In terms of its implementation mechanisms, The Comhlámh website explains that "The Code of Good Practice works to facilitate learning, build the capacity of volunteer sending agencies and ensure accountability to partners and local communities overseas. The Code network enables peer exchange and support amongst organisations; and collective initiatives to raise standards across the international volunteering sector. Trainings, resources and outreach are also provided to support the implementation of the Code's values and principles.

Code Volunteer Sending Agencies (VSA) are required to undergo regular assessments, including annual self-audits and three yearly external audits, to measure their practice and identify areas for improvement. A recognition panel also meets annually to review progression and to award an organisation if it has attained a higher level of compliance".

Implementation – There are three aspects to implementation, as outlined on the Comhlámh website. These are:

1. Implementing Values and Principles – Code volunteer sending agencies are required to progressively implement the Code's values and principles by working to meet a range of indicators under each of the 13 PRINCIPLES to undergo regular assessments, including annual self audits and three yearly external audits, to measure their practice and identify areas for improvement. A recognition panel also meets annually to review progression and to award an organisation if it has attained a higher level of compliance.

2. Code Peer Support Network – The network meets twice a year and includes organisations that are party to the Code. This network enables the sharing of expertise and the development of collaborative initiatives and Code working groups on common issues. Currently there are three Code of Good Practice Working Groups – the Volunteering & Development Education Working Group, the Volunteering and Orphanage Working Group and the Code Steering Committee.

Box 3: Examples of Peer Regulation and Mutual Codes of Good Practice in Ireland – *contd*

3. Training, Discussion Forums and Exchange – These are organised to enable VSAs to implement the Code's values and principles. Training needs are identified at the biannual Peer Support Network meetings and through the work of the various Code working groups. Access to relevant resources is also facilitated through the dissemination of the Code monthly newsletter and the Code resource website section, Comhlámh's Volunteering Quality Project Officer provides support, including outreach, to Code organisations.

Awards – Comhlámh explains that all Code volunteer sending agencies are on a journey of continuous improvement in implementing the Code standards. Progression is awarded by a Code icon which reflects an organisation's growth and stage along this journey. There are three awards, one for signing up to the Code, a second if the has reached what's called an 'intermediate level of compliance' within 3 years of its first external audit. "In order to reach this level a volunteer sending agency (VSA) is required to have 15 of the intermediate compliance indicators fully in place, and 6 of the intermediate compliance indicators substantially in place to be awarded this Code icon". An organisation is awarded the advanced level of compliance award if they "reach the advanced level of compliance within 3 years of having reached intermediate level. In order to reach this level a VSA is required to have 20 of the indicators fully in place (including all 21 intermediate compliance indicators); and 7 indicators substantially in place".

Further details on the various indicators and processes involved in this code are available from the Comhlámh Website: https://codeofgoodpractice.com/awardicon/

IDEA Code of Good Practice for Development Education

The IDEA Code of Good Practice for Development Education was developed by IDEA members between 2016 and 2019 "who aim to collectively build the quality of Development Education practice in Ireland" (IDEA, 2021: 2). The Users' Guide introduces five steps in the process of the 'Code journey'. These are:

1. Commit to the Code journey: Seek a commitment from your colleagues to commit to this Code journey, either from your whole organisation, or chat it through with a peer if you are an individual practitioner. Ensure that sufficient time and resources are allocated for the work. Sign the 'Code Commitment' form to begin your journey. For organisations, the CEO/Director must be the signatory, and the Board must be informed about it. Please note that while the Code journey is open to all IDEA members, it is not a condition of membership.

2. Complete your Code Self-Assessment and draw up your Code Action Plan: With your colleagues or a peer, carry out your first self-assessment. Use this to decide which focus areas you will prioritise. You may choose three or four – be realistic about your workload! Focusing on these principles/indicators, draw up your Code action plan. The Code principles are not in any order of priority or to be viewed chronologically. However, we recommend that Code Members consider Principles 1, 2 and 3 as building blocks to quality Development Education. Share your plans with your team/colleagues and IDEA. IDEA will provide feedback on your selfassessment and action plan.

> **Box 3: Examples of Peer Regulation and Mutual Codes of Good Practice in Ireland – *contd***
>
> 3. Avail of support along your journey: IDEA offers networking and training supports based on members' needs. Opportunities will be provided to link with and learn from other members on how they are working on the Code and their Development Education practice. Contact IDEA for details.
>
> 4. Once you have implemented your Code Action Plan, carry out another Self-Assessment: Once your first action plan is completed, review and complete your self-assessment framework to assess your progress. Discuss this as a team (or with a peer), identifying what is going well and where you may need more work or support. Your findings will inform your next Code action plan which you should draw up now for the next phase of your work. IDEA will provide feedback on your self-assessment and action plan.
>
> 5. Share and celebrate! A central value of the Code journey is sharing the array of good practice that's happening in the Development Education community. Whatever stage you are at, we will all benefit from sharing the evidence of this good practice as a community. Forums for this will include networking, support and training opportunities related to the Code.
>
> Further details on the Code of Good Practice for Development Education are available from: https://www.ideaonline.ie/Code-of-good-practice-development-education.

The Dóchas Code of Conduct on Images and Messages

The Dóchas Code of Conduct on Images and Messages ('the Dochas Code'), was developed in Ireland in 2007 from an earlier (1989) EU-wide NGDO code. This code was designed to rid organisations' communications of stereotypes and simplifications and to ensure more dignity and respect for those represented in GD contexts. Through it, especially since 2007, Dóchas, the Irish Association of non-governmental development organisations, has been to the forefront of advancing ethical communications among NGDO networks in Europe.

The Dóchas Code promotes communication based on three key values and guiding principles. The values are: respect for the dignity of the people concerned; belief in the equality of all people; and acceptance of the need to promote fairness, solidarity and justice. These are very powerful values to base communications on, but in previous research conducted on the Dóchas Code (Dillon, 2012 – see Appendix 8 for detailed discussion of this review), many considered them to be aspirational and vague. As such, they may be interpreted in many different ways which has made meaningful and consistent compliance difficult to achieve (Dillon, 2012). Though more prescribed (see Appendix 5 for a copy of the Dóchas Code), the guiding principles of good practice set out in the Dóchas Code have also been regarded as presenting similar problems for adherence.

Implementation of the Dóchas Code has involved a range of different requirements in practice over the lifetime of the Code (see Table 3 below). As evident here, resourcing of, support for and monitoring of the implementation of the Dóchas Code has reduced significantly in the last five years. The rest of this section addresses participant views on its application among NGDOs including its strengths and weaknesses, challenges and suggestions for the future.

Table 3: Implementation of the Dóchas Code

Mechanism	2007 – 2012	2012 – 2015/6	2016ff
Dóchas Members sign-up	Requirement	Requirement	Requirement
Assessment	Complete survey – findings presented at annual signatory meeting	Complete self-assessment – findings presented at annual signatory meeting	Letter of compliance sent to Dóchas
Dóchas Staff Support	Half time staff person responsible for comms in Dóchas including promoting and supporting Dóchas Code	Half time staff person responsible for comms in Dóchas including promoting and supporting Dóchas Code	Dóchas staff responsibility for comms shifted away from the Dóchas Code
Peer Engagement	Attendance at annual signatory meeting compulsory – 1 day; Dóchas Code task group of the Dóchas DEG	Attendance at annual signatory meeting compulsory – ½ day; Dóchas Code task group of the Dóchas DEG	None and No Dóchas Code Task Group
Research	Peer Research undertaken by the Dóchas Task Group (Dillon, 2012)	DEG research on Finding Frames commissioned, (Murphy, 2014)	Research undertaken on Attitudes to Development Co-operation; Worldview Research, 2021 etc.
SMT and Board	SMT sign off	SMT and Board discussion and sign off	Not monitored
Code Champion	One person identified but not compulsory	Emphasis placed on this after 2012	Not monitored
Complaints Mechanism and Feedback	To be posted on organisation's website	Updated language and guidance around these – to be posted on org's website	Not monitored
Training	Provided by independent trainers, e.g., at Kimmage Development Studies Centre	Training of Trainers provided at Kimmage Development Studies Centre; Training plan to be developed by orgs and outline on Dóchas website	Not monitored
Guidelines and Resources	Various versions of Dóchas Code produced and disseminated; resources gathered and uploaded to website	Illustrative Guidelines on the Dóchas Code developed by the Dóchas task group and available on website (2014)	Illustrative Guidelines and resources on website. Reduced range of resources available from mid-2020.

For more information on the Dóchas Code, see: https://dochas.ie/images-and-messages

Participant Research Findings

How the Dóchas Code is being Applied by NGDOs

In this section, I focus on participant views and experiences of the Dóchas Code. I return to broader issues of regulation in Section 5.

General Issues

In questionnaires, participants were asked to rate the Dóchas Code of Conduct on Images and Messages in terms of its effectiveness for ensuring ethical communications in GD. One person rated it 'very effective', six rated it 'effective', four rated it 'not very effective' and one person said it was 'difficult to judge'. In explaining their answers, among those who said it was very effective or effective, the following points were made: *"it's robust. Of all the problems in comms in IDNGOs in Ireland, the Dóchas code of conduct is not one"* and *"I think it is being considered and respected as a good practice".* One person said that *"it is effective when organisations prioritise it. But this is not a given. Also, the Code has no teeth. There needs to be interventions and repercussions for organisations and individuals who don't uphold it."* Three people explained why they thought it was not very effective: *"if the key players aren't fully on board than it can't be effective"*; there's a *"disproportionate focus on images, insufficient on messages",* and *"its current effectiveness is not great because it has been so long since it was implemented without being reviewed, and there is no accountability system in place. IDNGOs have not been reminded of its importance, and the message needs to come from within fundraising teams as fundraising is the biggest challenge in the code".*

Commitment to the Principles in the Dóchas Code

Most participants in interviews and focus group discussions expressed strong commitment to the principles and practices promoted in the Dóchas Code, applying them to their treatment of representations and stating that many organisations apply some of the implementation mechanisms associated with it. Many participants expressed being *"quite conscious of the Dóchas Code"* (Martina – 1). One person explained that *"it's really respected in X organisation and people would speak positively about the Code and it's become, it has, you know what, in a positive way, it's become part of the culture of the X organisation, apart from the DRTV, but with everything else and people take it seriously"* (Chloe – 1).

Embedded in Organisations

Others explain that the Dóchas Code has become 'integrated' or 'embedded' into their own organisation or brand guidelines, policies or practices. This happens in terms of influencing the culture, as Chloe – 1 suggested above, and also more formally when it is referred to in processes around approving content for campaigns or in relation to photographs used. Elisha – 2 explained that in her organisation,

> "it's been part of X organisation's approvals' process for years. It's pretty much ingrained, so people would know if it's compliant or not, and that's in relation to imagery… and the same with the messaging. It shows people respectful and dignified, it's fair and it's done in solidarity. It is ensuring that our communications are in line with those principles and our guidelines would bring us up on that if they weren't."

It is interesting that Elisha – 2 was speaking about an organisation that was criticised on a number of occasions by other research participants in terms of their Dóchas Code compliance. This highlights issues around loose interpretation, which also emerged in the earlier review of the Dóchas Code (Dillon, 2012).

Mixed Application

Problems around interpretation are augmented, according to Emma – 2, by the fact that it isn't *"terribly specific. I feel it's probably broadly in line with my own values. I refer to it occasionally, but it's rare enough that I go and actually read it and check something"*. This is not the case with the Dóchas Code Illustrative Guide, which Mary – 4 feels is *"invaluable… I would struggle to communicate what to expect and there it is, ready"*.

There is this sense, among some, that they know the code and that their organisation's practice is 'broadly' in line with it. Faith – 4 feels that *"most of the development NGOs kind of got it, even if they fell short of it sometimes, they understood why it was important"*. Freja – 3 agrees that *"ideologically, at the beginning, I can understand where it came from… almost like a Q standard. It literally was saying this is the line we're going to aspire to"*. She believes, though, that NGDOs *"got confused along the way. I think at the beginning there was an idea that this could be a positive thing… where we could have had some common ground and common purpose that people could buy into, aspire to, that the principles were ones that were worthy of engagement with"*. As such, though many describe the Dóchas Code as 'influential' or 'really important', with one person saying that she *"found it brilliant because it was really practical"* (Elisha – 2), there are clearly areas for improvement as discussed below.

In the meantime, it may be a fair summation to highlight Martina – 1's point in relation to application, that *"it's a mixed bag. In fairness, I think most organisations take the Dóchas Code seriously, I think, maybe they just struggle with knowing how to apply it with their own circumstances"*. She went on to say that *"there's a tendency to say organisations are signatories to the Dóchas Code and they adhere to this and they avoid stereotyping but then in practice, sometimes, it doesn't seem like that"* (Martina – 1).

How Relevant is the Dóchas Code?

In addition to the comments included above, some research participants specifically commented on the relevance of the Dóchas Code.

Freja – 2 feels that though communications are a really important issue for NGDOs, the Dóchas Code is not featuring as part of conversations happening around it. She explained:

> *"the whole sector is really struggling with communication overall. I think it has become a very significant issue for most organisations now and it is around 'are we telling about our good work, are we telling about our successes, are we telling about our failures? How do we engage people more?'... Do I think the code on imaging and messaging is in any way filtering through those strategic conversations when the word comms comes up? I would say no."*

Joyce – 4 believes that *"it's great we have a code. It's something to come back to. It's something we can always say, 'is it compliant with the code?' We've all signed up to it but I do think it's a bit dead at the moment"*.

Hugh – 4 believes that the Dóchas Code is still relevant in terms of how his organisation uses it but he feels that its relevance has been undermined by uncertainty about what's required in terms of compliance and poor Dóchas follow up on it. He explains how his organisation refers to it and engages with it in training new staff and, in that context, that it guides understanding around *"what we want you to be paying attention to. These are the areas that are no goes"*. On that basis, he said, *"it's highly relevant for us, but within the sector, I think it's lost a lot of its relevance because increasingly the voluntary nature of it and the reporting back on it, really, I don't know what happens within Dóchas around it anymore"*. Going on to talk about reporting mechanisms, he says *"we make sure we do what we need to in terms of our chairperson, in terms of are we accountable, is the code there? But what happens when it goes to Dóchas? We used to do much more reporting on it but now it's just a declaration. You may as well be the person saying to the guards, no I haven't committed a crime"*.

On a more positive note, Paula – 3 sees the relevance of the Dóchas Code in terms of *"an immense obligation to approach our communications from the guidelines of that code of conduct… because we are driven by this notion of human dignity in X organisation, it's very important to have that framework to work from".* Andoline – 4 believes that

> *"it has been really important and it's easy to point out what it hasn't done and there's still an issue out there, but it's really the only game in town. It has become such an institutional thing. That you do just need to refer to the Dóchas Code and people know instantly what you're talking about. That's not an easy thing to achieve, actually. People mightn't know everything in it, and it might be years since they read it but they still get the gist of what it's about, that you shouldn't portray people in a way that they lack dignity, portray them as helpless victims, that you should get consent to take a photo, know what you're going to use the photo for. To get those basic values institutionalised in the sector is a huge achievement."*

Perceptions on the Use of the Dóchas Code among Organisations

Participants spoke about how they use the Dóchas Code in very different ways in their organisation's work. Commenting on how familiar they feel people are with it, how often and how they consult it, whether it is integrated into their policies etc, it is clear from participants that organisations engage with it to varying degrees.

Table 4: Levels of Engagement with the Dóchas Code

Area of Engagement or Use of Dóchas Code	Basic (a lot to do)	Moderate (areas for improvement)	High (perhaps taken for granted and in need of review)
Familiarity with it	Emma – 4 – *"it's not very evident at the moment"*; Joyce – 4 – *"a lot of people don't know the code"*	Martina – 1 – *"we are quite conscious of it"*; Laura – 2 – *"I haven't learnt it off by heart… but I have read it and I would be familiar with the dos and don'ts"*	Elisha – 2 – *"it's pretty much engrained"*
Learning and Training	Alice – 1 – *"training to the fundraising team… new people trained on it"*	*"induction and training for all staff but we don't use refreshers"* – Elisha – 2;	*"courses on ethical communications, and the Dóchas Code training"* – Andoline – 4; Joyce – 4 – *"needs to take a wider angle… starting with sort of bias do I have? What sort of stereotypes? it needs to lead into the code"*
Using images and working with photographers, consent etc	Share a copy of the Dóchas Code with them – basic consent process	Share and discuss Dóchas Code and implications for taking photographs, 'deeper consent', use of consent form – Alice 2	Detailed engagement with all staff around consent issues and resources to allow for more sophisticated content generation processes as a result – Victor – 1
Management	Ensure management sign off on the Dóchas Code – Jack – 2	Management and Board Training on the Code	Management ensure systematic education and training plan implemented
When Developing Materials	*"I keep it on my desk so I can go back to it"* – Paula – 3	*"decisions are made according to the need to adhere to the Dóchas Code"* – Paula – 3	*"If images were to emerge from a photoshoot that didn't adhere, they wouldn't see the light of day"* – Paula – 3
In Education	Share Dóchas Code – Mary – 4	Explore issues around Dóchas Code and ethical communications with participants – Hugh – 4	Use Dóchas Code to explore stereotyping and *"there are different ways of tapping into it"* Mary – 4

Challenges with Implementing the Dóchas Code

Contradictory Interpretations

When asked about the challenges related to implementing the Dóchas Code, participants referred to some of the challenges more broadly related to ethical GD communications discussed in Section 2, e.g., around the conflict (Emma – 2) or tensions between fundraising and public engagement and the difficulties of getting it right when it comes to communicating *"the reality of the situation"* (Jack – 2), with one education person feeling that fundraising staff have a *"misconception of the code. People think it forbids you to depict realities but that isn't it. But that's what I keep hearing"* (Joyce – 4).

This brings us back to the point about different, competing and sometimes contradictory interpretations of the Dóchas Code in terms of its application to representations. Emma – 2 explained: *"I have heard people referencing the code but giving exactly opposite points of view, both referencing the code. People throw it around… it's very hard to see anything that would prevent anything in the code, so it offers a layer of protection… it's so broad that others can usually say it's not specific enough to prevent what I wish to push boundaries around, so that's challenging".* This highlights some challenges related to how different staff within NGDOs are using the code. On the one hand, it can be used to legitimise communications that others would feel are unethical, on the other, it can be used to *"push back"* (Emma – 2), i.e., to hold them to account. It can also apply *"so they can say to Irish Aid in their results framework that they have a set of principles and policies"* (Freja – 3).

'Tick Box' Approach

This 'tick box' approach (Faith – 4), which leads to people asking, *"how far can we push back the boundaries of the code?"* (Joyce – 4) undermines confidence among many in NGDOs in the Dóchas Code. This is augmented, for Freja – 3, by the fact that there seemed to be one rule for some organisations – the bigger ones – and another for smaller ones: *"the big and the powerful, so no one was going to address X, X and X for using an image of a potbellied child with flies in his eyes, but the rest of us…I lost absolute faith in it".* She went on to liken it to being a member of a club: *"if you publicly disgrace yourself at a GAA match, you get suspended from the club. If you publicly disgrace yourself as a member of Dóchas, everybody pretends it didn't happen".* For Freja – 3, this was compounded by *"nonsensical"* standards which placed emphasis on technical areas of implementation, e.g., attendance at meetings, completion of forms etc, rather than on the ethical nature (or not) of the images and messages that organisations were portraying. It was also compounded for her, and others, by the fact that it placed Dóchas in a position of *"behaving like a policeman on images and messages, but only to a few" (Freja – 3),* with *"rules we must abide by"* (Jack – 2). While Freja – 3 feels that *"the rules"* were not sufficiently or equally applied, Jack – 2 expressed that the rules were too rigid: *"it's almost like watch yourself, be good, don't do this like, do this, as opposed to being a tool that facilitates good judgements and good decision making within INGOs".*

Thus, the issue of 'policing' or ensuring that members are implementing what they have signed up to emerged as a significant challenge. Freja – 3 felt that Dóchas were not always certain of its role in ensuring compliance. This was interpreted differently by participants, with some feeling that there are too many rules, and others that compliance has not been focused on the correct things or that it has been applied unequally. Suggestions for Dóchas in terms of its role in this area and for the future of the Dóchas Code are addressed in the next section.

Suggestions for the Future of the Dóchas Code

In questionnaires, participants were asked for their views on changes that could be made to the Dóchas Code (see Table 5). The points highlighted here complement those which emerged in interviews and focus group, with participants arguing that at a minimum, the Dóchas Code needs to be revised and updated, with more rigorous implementation.

Table 5: Questionnaire, Q. 26

If you were to make any changes to the Dóchas Code of Conduct on Images and Messages or to the ways in which ethical communications are advanced in Ireland, what would they be?
Need to be updated to reflect new social media channels, but also in light of BLM and other movements critiquing the 'colonial' experience. But limit expectations – it can only ever be a guide/tool – it'll be up to senior managers/organisational culture to dramatically shift communications.
Firstly, update it to make it more current and then improve the process for signing up and adhering to it.
I would make the Code enforceable and applicable in all aspects of INGO operations, including disasters and emergencies. There should be an Irish version of the DAC to enforce and police this issue.
Specificities in relation to the portrayal of persons with disabilities and terminology used
Make it a living Code, perhaps using the Comhlámh Code of Good Practice as an example. This is reviewed every three years in a participatory process, and there is an active working group on this. Organisations must also submit a self-audit which is reviewed, and they receive feedback on their progress. There is also a support network for developing capacity to meet the code's requirements. Irish Aid funds this – perhaps there could be a possibility for them to fund something similar here?
I would have people understand the Code of Conduct more clearly. Some people think they're following but maybe aren't in practice. That's a communications, perception and understanding issue, not something with the policy itself. I would invest in communicating that more clearly to stakeholders by going to a communications or advertising agency and having them work on something that's very visual to convey the message, like a short film or printable document with lots of images and illustrations.
I feel the blind spot of the code is that it doesn't cover individuals who may be using their personal social media accounts. Expand the responsibility out to individuals working internationally; in our case, volunteers going on international placement. Despite thorough training and reinforcement while working with them, I have seen countless social media posts where the Code standards have not been met and some very problematic portrayals of host communities have been published. Individuals have a much further reach than any IDNGO and they are the weak link in the Code because they are upholding and propagating stereotypes.
More people are being seen doing rather than just being – Africa is moving forward and the images need to reflect this.
It needs to be more relevant to 2021 communications, styles and channels

Revise the Dóchas Code

I asked most participants in interviews and focus group discussions what they think should be done with the Dóchas Code. Overwhelmingly, rather than it be scrapped (though a few people felt it should be replaced by something more thorough or of a different name), they felt that it should be revised and updated and strengthened through the implementation of compliance mechanisms. No one felt that there should be no sector-wide agreed principles or standards or that ethical communications was not important. As Paula – 4 put it, "*I certainly would not advocate that it be set aside unless there was a really stand out, exceptional replacement for it. I think it's really important. It's part of this overall need and effort to be more transparent as a sector… and to be more responsible with how we portray the honesty of situations.*" Those who felt it should be replaced were those calling for much more widespread and systematic implementation of ethical mechanisms around equality, diversity and inclusion (EDI) and decolonisation. I discuss these in the next section. Here, I focus on suggestions specifically around the Dóchas Code.

Needs Energy

There is general agreement that *"the core principles… are really relevant"* (Victor – 1); *"the principles of it are completely right, we should be following it"* (Elisha – 2). Participants talked about the fact that it is *"a bit deflated",* not so much *"at the forefront"* as it was 10 years ago, that *"a bit of energy around it could be useful"* (Victor – 1) and that *"it's something that… should be built on and reinvigorated"* (Áine – 4). Some people felt that the Illustrative Guide also needs work. Elizabeth – 5, for example, suggested that it should have more definite statements around what works or doesn't, what forms of communication reflect the principles etc. She also felt that it *"talks about the development context as if it's homogeneous in itself. It doesn't acknowledge that different cultures and countries… and even different cultures within countries see imagery and language and use it differently"*.

Update It

At quite a technical level, some feel that *"it wasn't signed in the digital era and there's more that could be really explicit in it"* (Alice – 1), and it needs to be updated to include the *"multimedia"* context, moving away from the emphasis on images towards film and acknowledgement of social media (Ava – 1). At a deeper level, Ava – 1 thinks that it needs much more detailed guidance on *"how do we actually gather content"* and around naming of people. Alice – 1, for example, highlights that it's *"sometimes not suitable for someone to be named".* She would like a framework that she can follow, and Zoe – 4 would like *"something more there that could invite … some of that reflection".*

Make it Useful

Zoe – 4 feels that something like the Dóchas Illustrative Guide that "*would actually be useful for people who are content creators, I definitely think something more fleshed out, something that's like a little manual"* would be helpful , but it should *"acknowledge the lenses that we bring to reading our world and why that's worth thinking about and then maybe moves into something more that centres issues of representations, partners and work on the ground".* Steve – 4 also feels that *"it should be explicit where the Code is coming from… when we do this, it will help to fight racism… so the code that Dóchas has is very important. We need to re-read it in terms of colonialism and ending colonialism and also living together without racism in a multi-cultural society".* In many ways,

updating and revising would involve more comprehensively and inclusively reflecting *"the context we're talking about"* and that *"the pace of change is very rapid"* (Áine – 4).

Clarify its Purpose

Clarifying the purpose of it, who it is for and what the Dóchas Code is designed to do is important, according to some people, who also emphasise the importance of making sure that the process undertaken to revise or *"overhaul"* it (Freja – 3) is done properly and inclusively. Áine – 4 talked about the need for a *"renewed look at the conversation because the conversation always moves on"* whereas Ruth – 2 feels that it's important to bring *"fundraising and dev ed closer together… to jointly reappraise what the Dóchas Code is and what we're trying to do and really agree that this is what we're trying to get towards… without doing the hard work, it will just be a tick box exercise and it will be another rod to fuel that internal debate."* Joyce – 4 feels that with *"current inclusion, BLM, the bias, stereotypes we're talking about, now is probably a real window of opportunity… maybe for that we would have to have a new name because the Code of Conduct, it's already dead"*.

Strengthening Implementation

As reflected in previous comments about ethical communications, there is a strong sense among some participants that the Dóchas Code needs to move and beyond being a *"tick box"* exercise (Arthur – 1) where it *"doesn't have teeth"* (Hugh – 4), beyond *"policies"* where *"we are suffering from policy evaporation. The Code is there but if we don't monitor the implementation, it may as well be on paper."* (Alex – 5)

Monitoring Compliance

Many highlight the problem with it being *"voluntary"*. As Linda – 5 explains, *"where it's not obligatory, you have regulation but you don't have to do it. If you don't do it, no one will compel you to do it. I think we've gone past that"*. Her criticism of Dóchas Code implementation overlaps with others who question *"who is policing that? Who is looking at it? You can't just put out a code of conduct… and expect people to go with that code of conduct. There's nobody looking at what's being done. It's still going on… You can put as many laws out as you want, any rules and code of conduct but there must be, maybe the Africa Centre policing this, they've got a very big stand on this"* (Stacey – 4). Mary – 4 agrees: *"you can sign up but it's very difficult then to monitor that without somebody to do it and promote it and maybe share things that went well with others"*.

Monitoring compliance or some sort of *"audit type approach"* (Elizabeth – 5) is regarded as important by most participants. Many working in fundraising and communications, especially familiar with early implementation mechanisms around the Dóchas Code tend to suggest revitalising some of them. Some talk about the value of self-assessment or a survey of compliance. Izzy – 3, for example, explains that

> "having it on the board's minutes every year as something that's discussed and reported on at that level is good. Having a code champion is good. Having a survey and to be accountable is good… you have more regularly to give a sort of a self-assessment and to keep you tuned in … having an annual training meeting, for us, seemed irrelevant… having said that, it was a great chance to come together and hear people defend what they had done and images they'd used".

For Hugh – 4,

> "the previous iteration of how the code was managed was better than it currently is. It was more onerous in terms of time but it was a bit more meaningful than just declare that you're complying, that's meaningless. It doesn't happen in the real world… a little bit more, not of an assessment, but some kind of process involved".

Dóchas as the 'Standard Bearer'

On the basis that it has *"fallen by the wayside a bit"* even as *"a light touch code"* (Faith – 4), there's still a sense that breathing life into the Dóchas Code or making sure that organisations *"actually live it"* (Arthur – 1) is important for many people. Some advocate that Dóchas should be more *"hands on"*, *"improving standards … facilitating change in where it's negative"* (Freja – 3). There is talk of the need for some form of *"a standard bearer"* in the sector (Freja – 3). Hugh – 4, also believes that Dóchas should play that role, though he feels there is a reluctance around it because the bigger organisations who can afford the DRTV ads are those that Dóchas is financially reliant upon. With reference to *"a TV ad still going out with flies on their eyes",* he asks, *"why doesn't Dóchas as a standard bearer within the sector do something about it? If we're a network, surely that's a breach, we need to have a meeting about it internally… let's talk about it and see what's the issue here. So I do think those issues, they still get side tracked".* others feel it's important *"as a sector, being accountable to each other."*

Some also call for *"third party, regulatory involvement in it"* (Izzy – 3). Alex – 5, for example mentioned that

> "the Communications Regulator, ComReg, has to be involved… There has to be a red line… If you leave NGOs to have their own codes of conduct then you will find that there are others that are really compliant, others don't give a hoot, so if it comes from a government policy on international development, it becomes more fortified and solid, it gives a more solid base for the policies".

Linda – 5 agrees that it needs more monitoring and mentions a Charities Regulator-type role: *"I know the Dóchas Code has all the respect, dignity of the people, belief in equality but we know it doesn't mean anything in practice. So, some ways of measuring that you've actually ticked that box."*

Many of these points emerge in the next section which addresses support for ethical GD communications among NGDOs in the future. There, I deal with what might be involved with regard to learning, leadership and regulation and decolonising communications.

Summary of Research Participant Findings – The Dóchas Code

Findings show that the Dóchas Code has been effective in many ways. It is seen by research participants to have become embedded in organisations' practice and many are clearly committed to it. At the same time, there are issues around loose, multiple and contradictory interpretations of its values when translating them into practice, and vague notions of what it involves. Participants have a sense they know it and that organisations 'kind of got it', but application is mixed. Table 5 (above) shows the different levels of engagement with the Dóchas Code referred to by participants, and suggestions are outlined for how it can be improved. These include updating and revising the Dóchas Code, strengthening the implementation mechanisms around it and monitoring compliance. A stronger and more 'hands on' role for Dóchas as the standard bearer and 'professional association' of NGDOs is proposed.
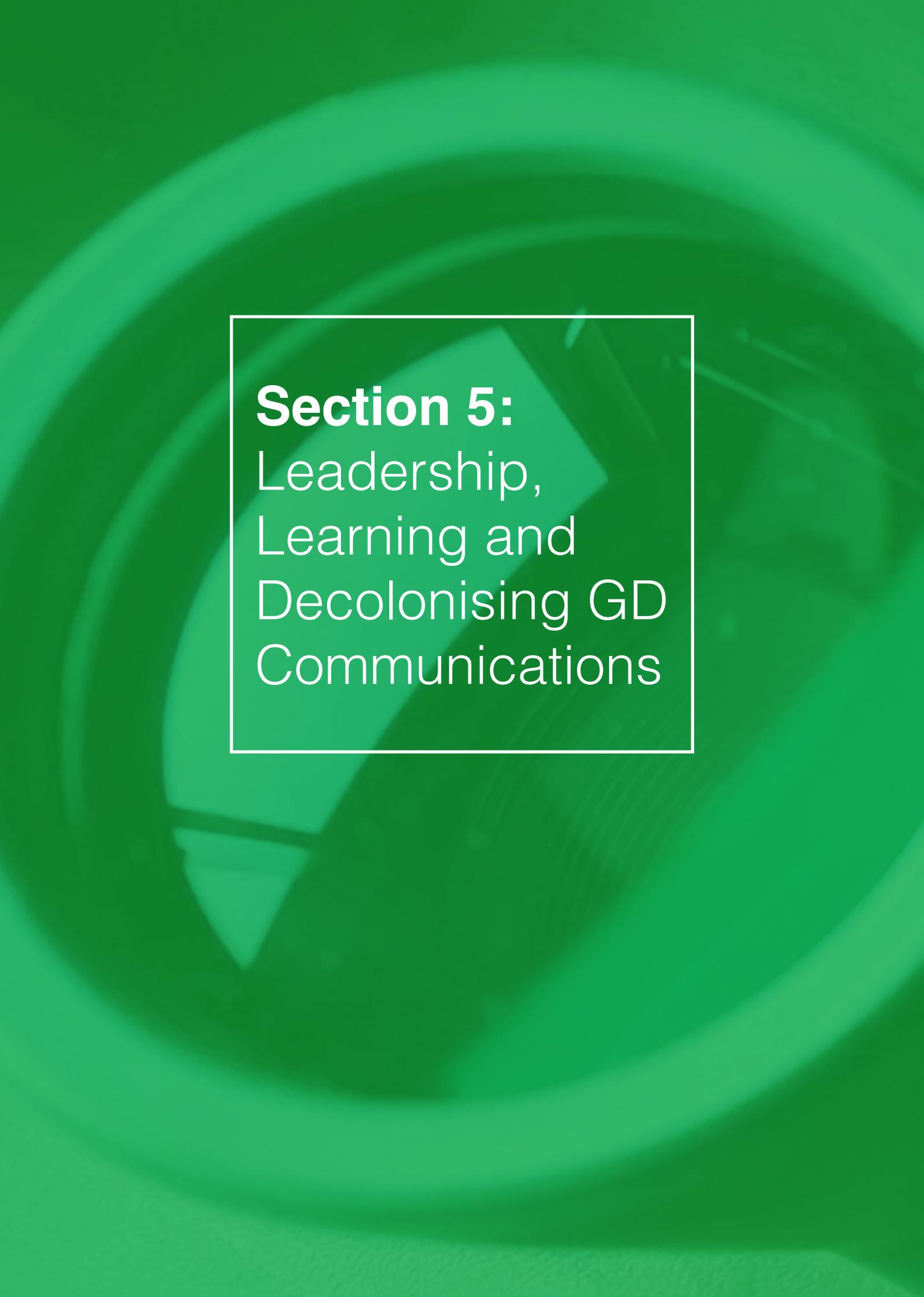
Section 5:
Leadership, Learning and Decolonising GD Communications

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Leadership, Learning and Decolonising GD Communications

Over many years, NGDOs in Ireland have played a leading role in promoting ethical communications based on the values of dignity, respect, equality, fairness, solidarity and justice through the Dóchas Code of Conduct on Images and Messages. Participants in this research are still committed to the principles outlined in the Dóchas Code and they believe they can play an important role in relation to it. At the same time, as they argue for more ownership around revised and updated ethical communications standards, they also seek more compliance and regulation. This calls for greater leadership from within Dochas and NGDOs and learning for change within organisations and the GD sector in Ireland.

So what is involved in leadership for ethical communications and what role might NGDOs, Dóchas and/or institutional donors play in supporting and regulating ethical communications in the future? The first sub-section below examines this with reference to discussion of organisational change, power and culture and with regard to different accountability and regulation approaches explored in Section 4. The second sub-section below focuses on learning (and training) for ethical communications. What forms of sharing knowledge and understanding are needed? What conversations need to be had? What approaches to learning might be most helpful when it comes to ensuring ethical communications? The third sub-section below addresses suggestions for how to decolonise development communications and how EDI and decolonising processes might be supported within the GD sector in Ireland. Both of these sections draw from insights presented in the previous sections.

Power, Culture and Change in NGDOs

To identify future directions for ethical communications among NGDOs, it is important to understand power relations in and between GD organisations and to reflect on what creates or achieves change within organisations. Considering NGDOs as cultural, political, economic and institutionalised spaces with practices and power relations which shape and are shaped by discourse (e.g., representations, representational practices and the assumptions which underpin them) can go some way to helping to understand the dynamics of change in that context.

There have been many attempts to understand organisational power, culture and the dynamics of change (Lewis et al, 2003; Gaventa, 2005; Hilhorst, 2003; Green, 2016). Without fail, researchers highlight the complexities involved. While many acknowledge that organisations are largely products of the broader global economic and political system within which they operate, others focus on the dynamics of creating change internal to organisations and institutionalised systems, such as NGDOs and the GD sector.

What is needed to support ethical communications among NGDOs at all levels of representational practice? What are the barriers to change within organisations and what is needed to harness opportunities to move beyond embedded communications practices and cultures? How can stereotypes be addressed and more equal, inclusive decolonised communications cultures be embraced? These are some of the issues discussed here.

Understanding Power for Social Change

John Gaventa's 'Power Cube' analysis is an attempt to understand power for social change. Drawing on a range of philosophical perspectives on power, it combines a multi-faceted approach to the various dimensions of power with mapping of the diverse spaces and levels in which these power relations are encountered. In his introduction to the Power Cube in an early (2005) report, Gaventa makes a very convincing point about the futility of superficial or institutional change that is not forged by changed power relations. He argues that

> "despite the widespread rhetorical acceptance of participation, rights and deepened forms of civil society engagement, it is clear that simply creating new institutional arrangements will not make them real and will not necessarily result in greater inclusion or pro-poor policy change. Rather, much will depend on the nature of the power relations which surround and imbue these new, potentially more democratic, spaces. More and more, groups who work in development – whether they are concerned with participation and inclusion, realising rights or changing policies – are also becoming aware of the need to engage with and understand this phenomenon called power" (2005: 5).

Understanding and addressing power through new systems and relationships is complex and challenging, especially when driven by participation, partnership and shared ownership. Gaventa highlights the essentially challenging nature of shifting power relations, of opening up powerful spaces and creating more democratic, inclusive and equal NGDOs, but the importance of trying to do so nonetheless.

Culture, Power and Organisational Change

From an anthropological point of view (Lewis et al., 2003) link understandings of power in NGDOs with culture when addressing change. They argue that it is very difficult to achieve organisational change without understanding how cultures work in organisations to embed certain practices and avoid others. Change cannot be driven by technical measures alone. It needs to be underpinned by exploration of values and power relations. This helps to address why some values become dominant in an organisation and how they can be challenged and changed, if necessary. Lewis et al. argue that organisations are not monolithic or homogenous cultures in their own right. This may seem obvious to those working in NGDOs but it is important, nonetheless, to remember "the range of culture/power relations within [an] organisation that compete, struggle and collaborate (albeit within a context of unequal power relations among them) in order to change the internal and external face of an organisation" (2003: 11).

Lewis et al go on to show how different understandings of culture can help us to understand the various levels within an organisation which influences change (or not) and where change strategies might be directed. They identify a framework which embraces analysis of practice, power and meaning and focuses on organisations in broader social contexts without reducing them to "those meanings and power structures in broader society" (2003: 16). For them, a focus on actors (individuals and groups) and their practices (what they do, decisions taken etc) is important especially when framed in the context of power. This amplifies the importance of change strategies which go beyond technical or superficial change, deep into the heart of organisations and the role of different actors or staff, for example, in relation to them, in this case in communications.

Importance of Relationships

Duncan Green also considers questions around change in organisations in his book 'How Change Happens' (2016). Influenced by systems thinking, he argues that "even though aid donors increasingly accept the futility of pursuing purely technical solutions that ignore political realities, they are still not willing to talk about power" (2016, 37). Referring to reading the work of Krznaric, which inspired his book, he highlights the importance of focusing less on individuals within organisations and more on human relationships, and empathy and trust between groups.

For Green (2016), it is important to understand what hampers organisational change. He argues that institutions (organisational practices, hierarchies, decision making systems, staffing etc), ideas (ideology, traditions, myths, embedded assumptions etc) and interests (economic, political, status etc) often get in the way of (or by extension can enable) change. For him, understanding these challenges alone is not enough, it is important to understand what shifts them.

Organisations as Dynamic

Underpinning his analysis is a view of organisations as dynamic and reflective of different institutional and cultural influences. As such, he identifies change drivers within organisational cultures and leadership, state reform, legal mechanisms, and civil society activism. Putting values and culture at the heart of change, he argues that when social norms change, laws do and these can often act as the catalyst for changes within organisations. They often respond to what's happening around them, e.g., changes in gender norms and rights or around something like the power of the Black Lives Matter movement. An example he cites is worth reading (see Box 4) as it provides insight into the different levels of change required in realising meaningful change. For Green, change lies in agency and leadership, forging alliances for change, not seeing power as zero sum and being strategic. This points to the importance of leadership within NGDOs and in the GD sector in Ireland around ethical communications and of leaders being able to embrace the changes being advocated from outside, e.g., BLM and EDI.

Box 4: Duncan Green (2016: 31/32) – Example of Various Levels involved in Change

Let's contemplate how norms might shift on one of the most pressing issues of our times—climate change. What would it take for driving a car or exceeding personal emissions of X tonnes of CO2 per year to become as socially unacceptable as smoking or child abuse? A combination of academic research and UN negotiations could affect public understanding of personal responsibility and exert pressure for governments to act. Public personalities from sports stars to intellectuals could stand up and 'take the pledge'. National leaders could respond with laws, regulations, and public messaging, motivating schools to teach about climate change and environmental responsibility. Government regulations might include carbon pricing, which would help drive technological breakthroughs in renewable energy. Faith groups could emphasize stewardship and personal responsibility; in 2015 some of the most encouraging progress on climate change came from a Papal Encyclical on the Environment and an impassioned appeal for action from a network of Islamic scholars.

All this could be backed by activist organizations pursuing a range of tactics from litigation against carbon polluters, to using culture to spread the word, to We Can-style viral citizen-to-citizen networking. Major weather events provide obvious and semi-predictable 'critical junctures' that can galvanize interest from both the public and decision makers. Faith groups, businesses, academics, and civil society organizations could join forces in broad coalitions, abandoning the go-it-alone purism that has undermined efforts to date.

Far-fetched? It pretty much describes how major norm changes have always come about. Anyone interested in bringing about change should surely pay close attention to the way such norms are established and evolve over time. We campaigners and lobbyists often prefer to focus on the tangible—laws and policies, spending commitments, public statements of this and that. It's understandable: we are driven by the desire to measure our impact (and thus prove our effectiveness), by a frustration with the vagueness of 'talking shops' about rights and norms, or by sheer impatience at the slow pace of normative change. Whatever the cause, neglect of 'invisible power' is a big mistake. We can still focus on the tangible to communicate and to campaign, but norms should lie at the heart of our deeper understanding of how change happens. And the norm changes we contribute to are likely to be our activism's greatest legacy.

Participant Research Findings

The important role that CEOs and those on senior management teams can play in supporting ethical communications is mentioned with reference to different Dóchas Code requirements in Section 4. Here, I introduce a few key points made by participants, most of whom believe that organisational managers play a crucial role in supporting ethical communications practice. Leadership, wherever it comes from, is essential.

In questionnaires, the question was asked: How do you think IDGNO management can best contribute to improving IDNGO international development communications in the future? Though answers to this question varied among the twelve people who completed the questionnaires, four key themes emerged. The first was a call to managers to address power relations within NGDOs. This was described by one person as *"think about power within their organisations including how 'powerful' their fundraising teams are at dictating communications. If it wasn't about bringing in funds, how would communications change?"* and by a second as *"a better balance between fundraising*

and communicating on issues and impact. Fundraising leads messaging too much, leading to a distorted view amongst the public of what we do." Managers were also encouraged to take more risks, to *"step away from the traditional messaging that is known to work but fosters stereotypes"* and to *"invest reserves in research into effective, innovative fundraising communications."* For two others, who also emphasised the need to invest in communication, the focus is more on *"investing in processes which facilitate voices from the south influencing communication"*

Importance of Senior Management

In interviews and focus group discussions, the view that management can play a leadership role in terms of *"the strategic view and branding… worldview or the values [and] how we are placing ourselves as organisations"* (Joyce – 4) was expressed by a few participants. One of these mentions their role in *"putting into action the common shared humanity and the challenges we all face as a planet"* (Faith – 4). Participants referred to management sign off on the Dóchas Code and how important it is *"not just to get an organisation to sign off on a document but if you can get the CEO, head of fundraising and head of communications to buy into it, then the organisation will really follow the thread"* (Jack – 2). At more practical levels, management need to ensure that agreed policies and processes are implemented and to allocate sufficient budgets to ensure that any changes or improved practices that are agreed can be implemented. Paula – 3, for example, outlined that it's important for management to have *"an understanding of how important it is to fund tools and fund fresh photography, develop digital tools and making sure that the digital assets of the organisation are keeping apace with change and messaging, areas like that, trickle down support"*.

Code Champions

Though a number of people mention the importance of the CEO in different contexts, Chloe – 1 believes that *"there's juniors who want to change things, but if they don't have the buy-in from the SMT, it's not going to happen"*. Where 'code champions' can be very effective, Emma – 2 believes that it depends on who is in the role, arguing that it should be someone from fundraising. Faith – 4 thinks there needs to be two people as it gives more sustainability to the role. At the same time, it is important that code champions have support from or are people working in senior positions in an organisation. Andoline – 4 believes that *"unless you have direction from them [senior management], it will remain an argument between global citizenship colleagues and fundraising colleagues where they do their own thing"*. Victor – 1 explained that

> *"the level below CEO is crucial and that's where you have these tugs of war, your heads of fundraising and heads of programmes or communications or whatever. I've seen it in other organisations as well. It depends on how strong your CEO is and how willing they are to stand up to a head of fundraising, 'I'm sorry, we're not going to use that language'. When it gets really tough is if you want to change an approach because you know it's ethical but you know it's going to lose money. Less money is going to come in. Very few organisations are willing to make that decision. Most organisations want a win win. Most CEOs want to keep everyone happy and they want a win win. I think it's a very stark and difficult choice."*

Boards of Management

Boards of management are also seen as key to the success of any attempts to improve ethical communications but the point is made that many members of boards of management do not work in the sector and they may not be aware of the issues involved. Victor – 1 believes that

> "what would be really great, if it became the standard, if boards had representatives from partners or communities, people of colour, people with radical perspectives who were part of these conversations because boards can also be risk averse, people who don't want a media storm or crisis, don't want to lose funding and who will often steer an organisation to a safe space, so board composition is really key and diversity is key".

The Future Role for Dóchas in Supporting Ethical Communications

Bringing People Together

A key role suggested for Dóchas is to bring people together, to support more conversations, more peer learning and engagement around the topic. Emma – 2, like many others, believes that *"what would be most useful is some sort of industry discussion".* For her, this should address the very "*tricky, uncomfortable issues of when someone breaks the Dóchas Code… because it's an honour code, effectively",* so it needs to be addressed. Ruth – 2, and others involved in fundraising and communications, believe that fundraisers need to be brought into conversations in Dóchas much more. She said, for example, *"I don't think any of the fundraising people are part of Dóchas. None of us go to the Dóchas meetings, we're not part of those working groups. I think it's the fact that they call it as public engagement, they think of it as outreach and development education and fundraising is kind of the dirty brother or sister over here."* Jack – 2 referred to those managing the large budgets in fundraising and marketing departments and argued that *"the reality is… if you want to achieve change you have to bring in those people into the conversation... You have to bring in fundraisers and convince them because they're the ones paying for the ads, because if you influence them, then you have influence at scale."*

Working with All

While the fundraisers may feel outside of Dóchas, some development educators feel *"side-lined"* within it (Hugh – 4), and some working in small organisations express their relative powerlessness in the face of the influence of the bigger ones. Max – 5 feels that NGOs need to start talking to each other more, that there's too much competition and that Dóchas *"needs to be fortified"* as a professional body of international development practitioners "so that they can inform, possibly monitor and sometimes even discipline lack of professionalism in particular areas".

The relationship between the Dóchas secretariat and NGDO management was also highlighted in light of the importance of organisational leadership in driving ethical communications within organisations, and of the role that the bigger NGDOs play as leaders in the sector. One person suggested a meeting between the Dóchas CEO and the senior management team in her organisation:

> ❝ *"we're getting a strong message from the sector that Concern and Trócaire need to take the lead with no longer using this imagery, and you know, at the very least, if it's a presentation to all SMT, then the discussion has to happen at SMT level. It can't be kind of brushed under the carpet and said 'you know we have changed our messaging but let's ignore our DRTV ad'. You can sometimes be the sole voice in the room and want to change things and it can be hard if you're the only person, but if an external person comes in and says these things then it's easier to have that discussion." (Chloe – 1)* ❞

Leadership as a 'Professional Body'

In terms of its role as a 'professional body' or a 'representative body', there is widespread agreement that Dóchas is the correct body to support ethical communications in the sector. For Andoline – 4, *"if it's going to be situated anywhere, Dóchas is the space. They have sort of legitimate authority as the umbrella group and the owner of the code",* but she questions whether Dóchas currently has the capacity to support it properly. Hugh – 4 also feels that Dóchas should be the space where NGDOs are held to account. For him,

> ❝ *"Dóchas can only be a reflection of its membership and its membership is a mixed bag. So maybe Dóchas is too but that's where I would expect the leadership within Dóchas to do a little bit more, at looking at standards… We talk about whistle blowing at the very serious end of things – surely that culture is engendered at a much easier space and this area is something that we'd be able to talk about far freer… let's maybe have that peer end of improving our practice. I think the self-reporting thing, it's time is limited."* ❞

Similarly, Stacey – 4 believes that there should be "some kind of a monitoring structure or group" in Dóchas "because they're the ones that have put out that code of conduct".

Promoting EDI

Another important role identified for Dóchas is to support equality, diversity and inclusion measures, e.g., *"to talk to the people who are most affected by it [communications], and that's the people we're talking about and they're also here"* (Elizabeth – 5). Julia – 5 suggests that *"one thing Dóchas can do is to encourage organisations to have among its workforce people from those communities because Ireland has changed, it's the new Ireland, whether they're going to include diversity and inclusion… we have to change from inside to include everybody."* Joyce – 4 believes that Dóchas can lead a discussion on EDI because *"everybody wants to be inclusive and BLM and I do think we can jump on that train and make it deeper, and maybe that's a role Dóchas could have… don't let it pass".*

The Future Role for Institutional Donors, especially Irish Aid in Supporting Ethical Communications

Though many participants talk about institutional donors with regard to wider communications issues, when it comes to addressing the role that they do or might play in supporting ethical communications, Irish Aid is the main institutional donor mentioned. One person feels that maybe the only thing that might improve communications *"is donor pressure"* (Joyce – 4).

The point is also made that Irish Aid should work more closely with the Charities Regulator and that might have a knock-on effect on supporting ethical communications, but that would involve strengthening the communications requirements of the Charities Regulator. Another feels that Dóchas should work more closely with Irish Aid to promote equality, diversity and inclusion and in supporting a post-colonial analysis of development: *"Ireland is also a post-colonial country, so I think its development should have been a bit different, should have been more progressive, more revolutionary… especially a critique of colonialism and in solidarity with other people."* (Steve – 4)

Ethical Communications as a Condition of Funding?

An Irish Aid representative interviewed for the research explained that though Irish Aid does not currently monitor ethical communications as a general rule, it does request copies of NGDO communications from its civil society programme partners, and these are reviewed to ensure that they do not compromise the public engagement activities that they fund. That person describes the process as formal in the sense that the material is requested but informal in the sense that there are no sanctions attached to it, it is just one very minor part of a much bigger process of review of spending and it can form part of a discussion. The Irish Aid representative explained: *"there is that tension. How much can we comment on what an organisation is communicating which we're not funding directly and which we explicitly say we don't fund. We have said, though, that if there are communications which are undermining a public engagement programme, we feel we do have a right to comment."* When asked if they believed that ethical communications should be a condition of IA funding, they said

> " *"firstly it would involve a capacity that we don't have…. to look at all those comms and assess them against the code… but let's imagine… once you get into the field of communication, it's tricky, maybe it's legitimate to censor them in that way, you're not complying with a code you've signed up to. I'd feel uncomfortable with it. It's just such a strong principle… civil society should have autonomy separate from government… when it comes to conditions of funding, it's tricky… also… if it's going to have an impact on the bottom line of an organisation… that's a very difficult thing for an organisation to do. You can't be threatening the viability of an NGO, can you?"* "

Regulation and Ethical Communications

When it comes to different forms of peer regulation (Section 4), we have seen that it is most successful when people involved have a sense of ownership over it. Ownership, then, is important (but not essential). People are much more likely to embrace change if they feel it is driven by them or, at least, that they have meaningfully participated in it. Change imposed from outside is often rejected or, at best, treated as something to do because it has to be done – a 'tick box' exercise. On the other hand, some changes are too important to wait for people to 'come on board' or 'buy in' to

them. When change threatens people's power or position, it often has to be imposed, e.g., gender equality. The question is, is change in the area of GD communications important or urgent enough to impose it or would it be more successful if emphasis was placed on supporting engagement and ownership around any changes made?

Transformation processes are more meaningful when there is congruence between these processes involved (e.g., of engagement, consultation, debate and policy making) and the purpose of the process. People in positions of leadership can play an important role in guiding, supporting and resourcing these processes. Thus, if the aim of the process is to democratise communications, to make them inclusive and to actively use communications to challenge colonial, racist or sexist stereotypes, for example, then the processes around trying to achieve them would need be inclusive, democratic and critical.

Research Participant Findings on Regulation of Ethical Communications

In the research, participants were asked what they would favour in terms of the promotion and support of ethical communications in the sector in the future. As outlined in Section 4, many feel that though the Dóchas Code is very relevant and it has contributed to some progress in the area, it is currently dormant and lacking energy or vitality around it. At the same time participants feel that this is an important area which needs ongoing support. Though most are wary of imposed forms of regulation, though some highlight the urgency and the value of external regulation, there is no doubt that some forms of regulation and leadership are required.

Future Forms of Regulation

In focusing on regulation, one way of considering this issue is to explore the question in terms of different views, e.g., on whether participants favour self-regulation or external regulation, voluntary regulation or required regulation, the 'carrot' approach of awards or the 'stick' approach of sanctions or in relation to dealing with complaints (see Table 6 below). Pitting these in opposition to each other like this is, of necessity, quite limiting. The answer to the question I pose here is a bit of everything, though most people tend towards the overall 'softer' side of these regulatory polarities with the hope that it will lead to something that is *"enforceable"* (Linda – 5) in the end.

Faith – 4 believes that the type of regulation should depend on the issue or area being addressed. She argues that *"you have to decide what you want to get out of the code and then what's the best method around it".* For her,

> *"with any sector code, when it's not an issue of governance, when it's not an issue of financial compliance, with something like your communications work, it has to be a work in progress all the time… you have to be able to take on board changes or suggestions. You want members to have ownership of it, not IDEA or Dóchas, you want them to care enough about his code to promote it internally but also to contribute to a community around it."*

Linda – 5's point shows the complexities involved in people's different positions around regulation and how a mix of approaches to regulation can work, especially when integrated with considerations around equality, diversity and inclusion (EDI). In calling for enforceable regulations, on the one hand she argues that there needs to be external monitoring and oversight, on the other, she thinks it needs to come 'from within'. At the same time, if it comes from 'within NGDOs', these have to change, to become more diverse:

> "without some ways of enforcing it, some ways of measuring the criteria, something that actually reveals what organisations are putting out there and approval before it is allowed to go out, some kind of a regulatory body that is enforcing that nobody can escape… let the change come from inside. How many organisations engage with people of African descent in Ireland about their work? If they can aim to employ those people, at least have one person… If Irish Aid could insist that there is diversity in the teams in the organisations."

Table 6: Regulating Ethical Communications

	'Soft' Side	**Middle ground – 'Third Way'**	**'Hard' Side**
Source of regulation	*'I like the self-assessment approach'* (Elisha – 2)	*"External auditing might help but if we do go down that road it has to be audited on a very practical basis and on a realistic basis in terms of trying to get that balance."* (Arthur – 1) *"The Good Governance award, the feedback from the Carmichael centre… you get your committee, they review… comes back to you and says, based on our standards for a small org or whatever you got 10/10 or 3/10, these are the areas you need to address to be eligible for next year."* (Freja – 3)	*"Self-regulation is no regulation."* (Alice – 1)
Type of regulation	*"Because it's voluntary, it's not even because it's voluntary, because there's nobody checking up on it, it definitely loses power."* (Andoline – 4)	*"It needs an internal and an external evaluation."* (Alex – 5) *"We did talk about how do we peer review people's content, so in a safe space so we're not pointing the finger? but we can kind of say we've done this, do we think that's right, so checking in that we are adhering to this."* (Ava – 1).	*"How would it be enforced, who would enforce it?"* (Ava – 1) If the Dóchas code was integrated into the Charities Regulator's Governance Code as the minimum standard for *"how you communicate about what your organisation is doing"* (Freja – 3).

| 'Carrot or Stick' | *"An award, e.g., for best fundraising campaign of the year… a photo of the year, or marketing photo of the year, there's a range of devices."* (Charles – 3)

"I'm always more carrot. I wouldn't want it to become competitive." (Zoe – 4) | *"Not awards but recognition for good practice, so you incentivise… you show to others what an interesting or good practice example would look like."* (Zoe – 4)

"Awards kind of miss the point, nobody does the perfect job… but the understanding or the conversation, having public opinion brought to bear… it's not going to be fixed by NGOs just talking about it themselves." (Áine – 4) | *"There was about 4 or 5 years ago where Irish Aid seemed to get more involved in the implementation of the code and if you weren't compliant with the code, it would be a kind of a black mark with what would be a lot of NGOs, one of their major funders. That was an element of carrot and stick but that seems to have receded in more recent times, that was about 5 – 6 years ago."* (Charles – 3) |
| Complaints – holding orgs to account | Having signed the Dóchas Code, *"nobody holds them to account… nothing happens, so, nobody ever says anything."* (Ruth – 2) | *"All organisations should have a complaints' mechanism… [and] something more central, Dóchas itself… if people start breaking the code, they can also complain through Dóchas… much stronger mechanism where complaints could be addressed."* (Steve – 4) | *"I'd appreciate a third party, regulatory involvement in it."* (Izzy – 3)

Re: GDPR – *"there's now a regulatory environment in the EU around compliance. The onus for compliance is on the holder of the information not on the person whose information is held."* – Q re: implications for NGDOs and for other regulations. (Charles – 3). |

'Third Way' Regulation

As can be seen in Table 6, most people strive in their discussion of regulation to find a way that allows for more robust and meaningful regulation of ethical communications among NGDOs but they do not feel that very 'hard' regulations are either desirable or very likely to work well. Chloe – 1 feels they are *"a little bit too big brother"* and that regulation should offer some flexibility: *"the Dóchas Code works quite well as guiding principles… we need a little bit of latitude for exceptions… it's a tricky fine line".* Áine – 4 believes that

> *"when you say admonishment or regulatory tools given to penalise people, for me that's a very negative way of approaching something that you want to be positive about and you want people to buy into… you have something that doesn't seem right because it can't be controlled, it can't be all the time monitored, there has to be an open conversation about how and why."*

Need for Conversation

An important point which also emerged from the research was the view, expressed by many participants, that there needs to be much more conversation and discussion around how to more thoroughly and effectively promote and support ethical communication among NGDOs in the future. This is suggested by Áine – 4 and Ava – 1 above, both of whom call for more open conversations, in a safe environment, where people can share their experience and knowledge. She said, for example, *"I think again having some sessions where you can share how you've done it on a budget or tips to make that feel realistic, because I think for some people looking at those guidelines they probably feel quite intimidating, so how do you make it achievable for people, what are the steps to getting at that best practice?"* (Ava – 1)

Aligned with this emphasis on conversation and creating safe spaces for sharing experience and holding people to account in a way which is directed towards good practice, are points about how other codes of good practice offer some insights for future regulation. These, in addition to the research presented throughout this report, especially in Section 4, may help to guide future discussions around this issue.

Learning from Other Codes

Whereas some people refer to the Wheel's governance code and the Comlámh code for Voluntary Sending Agencies, Elena – 4 mentions *"the core humanitarian standard"*. She says that

> *"it is a good model and we invest a lot in that, that's where the beneficiary voice, engagement with communities, principles and practices of the codes and accountability, we would put huge weight on that … Over a 10 year period, it changed how humanitarian actors engaged significantly. I'm thinking if you have something that has a regulatory framework, the Core humanitarian Standard is a fairly thorough standard that exists separate to the communications side in Ireland."*

The code most commonly referred to, especially among educators, is the IDEA code of good practice for development education. Further details on the code are presented in Section 4. Here, it is worthwhile focusing on the processes which are mentioned that are thought valuable for supporting ethical practice in the area.

Hugh – 4 described it as having

> *"a really good process, a really inclusive process. Its categorisation of how to deal with the principles involved… There's so much work there and IDEA's process around having two meetings a year where you submit your workbook, the self-reported work that you're doing but also the areas you feel you could improve on with a few action points. Like it's not very onerous in terms of time… it's ok… it's still important and those sharings with groups brought back twice a year, but there's real honesty to what we can do, it's a sharing peer thing, it's reflective of solidarity and working together."*

One participant who works in IDEA explains that

> "the DE code is quite intense. It's a lot more like the Comhlámh Volunteer Sending Agency code. There's an annual requirement. There's a split between educational practice and organisational practice… that you try to improve your own practice as a… trainer or whatever, but also try to influence the organisational approach to it as well. I think that can be helpful. The CEO has to sign off on the dev ed code each year… each year you have to renew your commitment to it… it's still early days and we'd be open to improving it ourselves but I think providing training on it, providing a space for members to share their concerns. I think all those things are really important, that community around it will sustain it." (IDEA participant)

So, the point is made very strongly there about the need for focusing on change and practice at individual and organisational level, as well as focusing on governance and on ensuring that organisations make an on-going or renewed commitment to it. A focus on building towards better practice is advised: *"we also try to show progress from year to year… sometimes your practice is better or worse from year to year, we don't see this as something that you improve all the time… you explain why and you have an action plan. Put in small steps. It's a lot more homework for organisations, but you're supported through it."* (IDEA participant)

Resources Needed

Implementing this kind of a peer regulatory approach requires considerable resourcing. The representative from IDEA believes that for 20 members, it's a three day role for a staff person. This is in addition to work done by an advisory group – *"it's crucial to have some sort of a feedback mechanism from the members about the bigger issues or the bigger questions of the code, like the fact that you don't like the term self-assessment or that the term 'comply' is not a good fit, to tease those issues out."* (IDEA participant)

In terms of the assessment involved, the IDEA code requires those who have signed up to do a self-assessment on an on-going basis: *"it's very much a self-assessment, it's not about comparing your practice with another organisation…. Sometimes comparing between organisations is not helpful but we do present back the overall levels to the members."* (IDEA participant)

Summary of Participant Research on Leadership and Regulation

At the organisational level, findings show the importance of leadership and of mangers implementing commitments they have signed up to, taking risks and supporting fundraisers, and to make difficult decisions in support of ethical communications. Dóchas is seen to play an important role in leadership as a professional body within the sector, bringing people together through wide-ranging consultation and engagement with CEO management and others. Some also call for Dóchas to play a stronger role in holding NGDOs to account and in promoting EDI.

The role of institutional donors also emerges, especially with regard to Irish Aid, which is seen to occupy a unique position with regard to Dóchas and NGDOs in Ireland. While an Irish Aid representative expressed reluctance to interfere too much in civil society, others see a role

for Irish Aid in supporting Dóchas and NGDOs in this area. In this section, participant views on future regulation and decolonisation are also addressed, with participants favouring a form of 'third way' peer regulation, which supports ownership and learning with some form of external monitoring. Examples such as the Core Humanitarian Standard and the IDEA and Comhlámh codes are referred to as robust but having inclusive learning processes, which support standard-building. Implementing such processes requires resources and regulation needs to be underpinned by systematic learning and decolonisation processes at a number of levels. These points are developed below.

Learning for Ethical Communications

Throughout this report, the importance of learning and training for ethical communications practice and for organisational change has emerged in many different ways. In the discussion around different approaches to ethical communication (in Section 1), the importance of critical reflexivity – being able to critically reflect on one's practice – is highlighted, as is the importance of social and mutual learning opportunities for supporting organisational accountability and good practice. Thus, alongside other research discussed in this report, research participants repeatedly highlighted the importance of mutual learning, conversations and peer sharing, as well as more formal learning and training opportunities.

In order to promote and support ethical communications, it is important to think in terms of learning not just for individuals but for organisations and to differentiate between learning and training. Learning, in this case, is understood as broad, deep and ongoing. It can involve many and multiple different learning opportunities and it has an open-ended emphasis, i.e., it is not designed to show people how to do specific things or to think in pre-determined ways. Training, on the other hand, is usually associated with short-term, specific-focused training to enable participants to behave in particular ways or to implement particular policies. Though these are very short-hand differentiations here, for organisational change, it is not sufficient to reduce 'learning' to 'training' opportunities, as evident below.

Organisational Learning

Many involved in NGDOs are familiar with the idea of the organisation being or becoming a 'learning organisation'. Despite its associations with the technicalities of monitoring and evaluation or with the limited notion of capacity building, as a concept, it has the potential to direct NGDOs towards a space of transformed culture and practice.

A 'Learning Organisation'

In 2003, Oxfam published a book edited by Laura Roper, Jethro Pettit and Deborah Eade, 'Development and the Learning Organisation: Essays from Development in Practice'. At the time, it aimed to introduce writing beyond a so-called 'Western' perspective and to emphasise the relevance of 'the learning organisation' for NGO organisation and practice. An early, and useful, focus in the introduction is on the difference between those who write about 'the learning organisation', associated with organisational change, and 'organisational learning', associated with individual capacity building within organisations. They highlight that the former, drawing on Peter Senge's work (1990), is "pragmatic in that it focuses on how organisations successfully acquire, share, and use knowledge to achieve organisational goals" (2003: 2). This includes, they argue, "an array of techniques and tools for doing diagnostics, examining patterns of behaviour in organisations, and

engaging in 'transformative thinking'" (ibid). It is normative in that it espouses a range of values directed towards self-improvement and it encourages organisations to

> "go beyond 'single-loop learning' which often focuses on finding efficiencies and dealing with first order problems (symptoms), to double- and even triple-loop learning. In double-loop learning, organisations consistently test assumptions, identify the roots of problems, and are open to fundamental rethinking of strategy. Organisations practising double-loop learning are open to examining how organisational practice diverges from 'espoused theory' and addressing these inconsistencies (for example, an organisation that espouses gender equality would be willing to examine the extent to which it lives its own values and make the necessary changes). In triple-loop learning, the highest form of organisational self-examination, people are open to questioning the very raison d'être of the organisation." (2003: 3)

This brings learning in organisations beyond individual-oriented learning, deep into analysis of power, culture and change. In discussions around 'the learning organisation', Ropper, Petitt and Eade argue that "individuals as well as the organisation are engaged in an ongoing quest for knowledge, their struggle to 'unlearn' dysfunctional behaviours is continuous, and because change is a constant, they must constantly change" (2003: 3). A central part of realising change in organisations then, centres around processes of learning, questioning values, practices and cultures and unlearning. Thus, the approaches taken, who is involved and how they are shaped are important considerations for change.

Learning Needs of All

A focus on learning is essential in order to support critical engagement with ethical communications issues in NGDOs. It is at the core of supporting people to understand what's involved in realising and implementing change, their role, new understandings or framings etc. To ensure that change is meaningful, learning needs to be systematically embedded, as the concept of a 'learning organisation' suggests, with participant learning needs to be built into organisational strategies around support for all involved. Though there are many different approaches to participatory, experiential, and critical learning, when addressing issues around representations, communications, coloniality, racism, equality, diversity and inclusion, it is important to ensure that the approaches applied are up to the task.

Critical Learning

Among the approaches advanced which can address complex organisational tensions and issues around ethical GD communications are those which are built on critical pedagogy (Freire, 1970) and post-colonial analysis with its emphasis on 'unlearning' (Spivak, 1988), 'critical literacy' (questioning values, assumptions and one's own reality) and 'decoloniality'. Vanessa Andreotti's (2012) HEADSUP checklist provides a useful set of critical questions for analysis in this regard (see Appendix 9). The e-Tick course on ethical communications which focuses on development and volunteering, but which has wider application, builds on this critical literacy approach and supports very accessible, engaging and creative learning experiences, in enabling learners to challenge preconceived ideas about and representations of GD. It could provide a useful steppingstone to more organisation-level training (see Box 5 for more information).

Box 5: E-Tick Course on Ethical Communications

This multi-sited open access short course in ethical communications takes learners on a journey of exploration using mixed media methods, critical pedagogy approaches and critical reflexivity. Learners engage with four aspects of the topic overall:

The first focuses on Expanding Awareness, exploring the limitations of what we (think we) see and know, using beauty as a theme. The second area explores power and communication – "who gets to communicate what? And why is this an important question to ask? Also, in terms of what we choose to communicate, what is the difference between appreciating cultures, and appropriating from culture?" The third area focuses, in particular, on Global Development and Volunteering, enabling learners to explore assumptions about them and the relationships constructed through them. Among the questions it asks is: "How might the assumptions we carry, shape the way we communicate? Do our communications reinforce or challenge stereotypes?" The last section explores "The New Media Age", including questions around engaging with digital technologies. (see e-tick https://ethicalcommunication.org/session/check-in/lessons/yes-13/)

The overall aim of the course is to explore "the links between critical thinking and ethical communication, the links between media, society and your-self and, finally, more awareness of: how you currently communicate about global issues and topics – and how others around you communicate about these same things [and] the response-ability you have as a message maker" (ibid).

Guidelines

Guidelines are often produced to support the implementation of codes of good practice and to act as a tool to enhance and follow up to learning and training on ethical communications. Though there are many guides on various aspects of good practice, in terms of ethical communications, two of particular interest here are the Dóchas Code of Conduct Illustrative Guide (2014) (Box 6) and the Guidelines from Bond, 'Putting the People in the Pictures First' (Box 7). Organisational guidelines are also often developed in light of these and other guidelines. Please see Box 8 for a summary of the Oxfam Guidelines. Such guidelines overlap with various other codes (discussed in Section 4), organisational brand guidelines, and guidelines on specific areas of practice which intersect with ethical communications, e.g., safeguarding. The form that guidelines take, how interactive or reflexive (enabling critical reflection) they are, can have a significant effect on the extent to which they are found useful, for what and by whom.

Research participant views on learning and guides are introduced below. It is also important to note here that this report does not focus in any detailed way on the issues outlined or addressed in the Bond guidelines, i.e., it does not deal specifically with improving practice around the design, development, use and archiving of images or with issue of consent. While research participants did refer to these issues in the questionnaires, interviews and focus group discussions, because they have been dealt with comprehensively elsewhere in recent years, that work is not replicated here.

Box 6: The Illustrative Guide to the Dóchas Code

The Illustrative Guide to the Dóchas Code of Conduct on Images and Messages was produced in 2014 by the Dóchas Task Group on the Code. Following the Review of the Code (Dillon, 2012), initial writing was done by Elaine Mahon and the text was completed by the working group. It was designed to support "organisations seeking to implement the Code and should be used as a complement to the text of the Code. The Guide provides practical examples of good practice when using images and messages as well as good practice when working in emergencies or using social media. It contains dedicated sections on consent, child protection, and accountability and feedback. Examples and questions posed in this Guide could also be extended for use with media and in organisational strategies, case studies and reports". (Dóchas, 2014: 6)

Most of the sections in the guide address one of the core principles of the Dóchas Code with advice on how to apply them in practice accompanied by illustrative graphics from A. Stiffler.

The Illustrative Guide is available online at: https://www.dochas.ie/assets/Files/Illustrative_Guide_to_the_Dochas_Code_of_Conduct_on_Images_and_Messages.pdf

Box 7: Bond – Putting the People in the Pictures First

Bond, the UK network of global development organisations, has also very recently developed its own 'ethical guidelines for the collection and use of content (images and stories)' https://www.bond.org.uk/resources/putting-the-people-in-the-pictures-first . Entitled 'Putting the people in the pictures first', it draws on the Save the Children research 'The People in the Pictures' (Siobhan Warrington with Jess Crombie, 2017). It is designed to support NGDOs to "employ empathy and sensitivity and to think critically about their work and the impact it may have on others" (2019: 1).

Recognising that it cannot address all the ethical dilemmas that NGDOs face in communications, it is not designed to replace the many guidelines which already exist. For example, it acknowledges that many NGDOs are signatories to the 'Code of Conduct for the International Red Cross and Red Crescent Movement and Non-Governmental Organizations (NGOs) in Disaster Relief', which has as one of its ten principles, "In our information, publicity and advertising activities, we shall recognise disaster victims as dignified humans, not hopeless objects".

That principle is explained as follows: "Respect for the disaster victim as an equal partner in action should never be lost. In our public information we shall portray an objective image of the disaster situation where the capacities and aspirations of disaster victims are highlighted, and not just their vulnerabilities and fears. While we will cooperate with the media in order to enhance public response, we will not allow external or internal demands for publicity to take precedence over the principle of maximising overall relief assistance. We will avoid competing with other disaster response agencies for media coverage in situations where such coverage may be to the detriment of the service provided to the beneficiaries or to the security of our staff or the beneficiaries".

Box 7: Bond – Putting the People in the Pictures First – *contd*

As such, the Bond guidelines are located in the context of other guidelines, including the Dóchas Code and it sets out a range of principles and guidelines on aspects of communication, especially around the collection and use of content, such as informed consent, accuracy and context, and avoiding stereotypes.

It is a strong document in its focus on ethical practice, its acknowledgement of power relations involved in communicating development and in its emphasis on contributors as subjects, not objects, of communication. Standards around "human rights, safeguarding and accountability" are seen to apply to content gathering as much as portrayal, and the commitment is made that "contributors' wellbeing will take precedence over our communications requirements" (2019: 4). In addition to these important considerations around values, responsibilities and critique of existing power relations in development, the Bond guidelines are strong in their use of egalitarian and inclusive language – they talk about 'the people we work with' – in the detailed consideration of what's involved in informed consent and in their discussion of what constitutes responsible portrayal. The latter, they outline, involves paying attention to accuracy and context in the collection, selection and use of images and stories; avoiding stereotypes and being careful in the use of third party content.

Accompanying these detailed guidelines is a statement of ethical principles written by Bond members which outlines responsibilities and commitments to ethical practice when gathering and using images and stories to communicate their work. This states [quoted in full here]:

"We rely on the images and stories of the people we work with to communicate the importance and impact of our work. These contributors generously share their time as well as their images, experiences and opinions with us and make our communications powerful and effective. Respecting their contribution means recognising them as key stakeholders in our communications and working to ensure that our image making upholds their rights to participation and protection.

We also have a responsibility to better understand the wider impact of our communications. Our communications should improve public understanding of the capabilities and resilience of the people we work with, alongside the realities and complexities of the challenges we are working to overcome. The global nature of our communications mean that our outputs can be seen by anyone, anywhere; therefore everyone, everywhere is an audience and so we must create communications with this in mind.

Adhering to the commitments below will result in NGO communications that work well for everyone: our contributors, their communities, our audiences, and our own organisations.

- We recognise contributors as key stakeholders in our communications. Our guidelines outline the different ways that we aim to put our contributors first and ensure that we respect their rights to participation and protection throughout our image making.

- We will adhere to the humanitarian principle of Do no harm when gathering and using images and stories. We recognise the vulnerable situations many contributors – particularly children – find themselves in, and we will fully assess, and respond to, the risks to our contributors of sharing their personal data (their images and stories) through our communications.

Box 8: Oxfam Guidelines – Second Edition, Jan 2020, Siobhan Warrington and Woulter Fransen

In tandem with the Bond guidelines on the collection and use of content, Oxfam produced a second edition of their 'Ethical Content Guidelines – Upholding the rights of the people in the pictures in content gathering, management and use' in 2020.

Driven by a rights approach the guidelines are seen to apply across Oxfam "to all those gathering, managing or using content" and aim "to ensure that content is gathered, managed and used ethically, in ways that uphold contributors' rights to participate and be heard, to experience respect and dignity, to make free and informed decisions, and to be protected from risk and harm. The guidelines also cover Oxfam's commitments to audiences and to the staff and others involved in story gathering" (2020: 4).

Like other guidelines, these focus on the commitments made, the values which they support and on the practical application of these in relation to various principles around dealing with content, i.e., working together, do no harm, informed consent, showing respect, ensuring data protection and integrity and accuracy in the use of content. In addressing each of these issues in turn, they outline some very detailed and practical ways in which a rights approach can be applied to ethical communications. They also highlight how the way it organises and prioritises stories can support the realisation of its values. They explain, for example, that stories are central to Oxfam's approach to development engagement and empowerment:

"Oxfam is committed to enabling people to tell their own stories and ensuring that the stories of the least powerful are heard. Oxfam recognises its responsibility to ensure its stories challenge and inform and contribute to determining a view of the world that does not accept the status quo and existing stereotypes. The stories gathered and used by Oxfam must reflect its values: empowerment, accountability and inclusiveness. We do not want to perpetuate the stereotypes of people living in poverty, but instead show a full and accurate account of the ways in which people live and act. These values must inform decision over which content we choose to gather as well as decisions over captioning and use in final communications including fundraising materials.

Images and stories that reflect the value of empowerment must show people as dignified human beings. We don't portray them as submissive or helpless, nor as victims, objects of pity, or incapable individuals waiting for help from others. People are survivors, not victims; they can be empowered, active participants in work, in life and in bringing about change in their lives. Images and stories that reflect the value of accountability would include those that accurately convey the realities of individuals' lives, with the aim of improving the understanding of audiences to the complexities and realities of the injustice of poverty. Images and stories that reflect the value of inclusiveness would include the diversity and range of people Oxfam works with in terms of age, gender, background, and culture" (2020: 5).

This set of guidelines is also interesting in setting the context for them, i.e., around the changing communications landscape, the need to respond to multiple unequal relationships, to respond critically and with empathy to various communications' challenges, and the need to budget and plan for additional time to allow for the implementation of good practice.

Box 8: Oxfam Guidelines – Second Edition, Jan 2020, Siobhan Warrington and Woulter Fransen – *contd*

Overall, like the Bond and Dóchas guidelines, these provide a lot of useful and important insights with regard to the collection, generation and use of images and messages within NGDOs. They do not address how these guidelines can be implemented in the messy practice of the day to day running of complex organisations aside from assuming that once staff or other stakeholders are told what the organisation wants, they will deliver it. Nor do they deal with tensions around competing cultures, interests or priorities within NGDOs. This presents a strong argument, once again, for networks like Dóchas to put their emphasis on understanding the barriers to and spaces for implementing guidelines for good practice.

Research Participant Findings on Learning, Training and Guides

When it comes to training on the Dóchas Code, many participants in the research talk about including it *"as an important part of an induction"* (Paula – 3). The minimum around this seems to be that people are made aware of the code. Joyce – 4 thinks that *"most people aren't even aware of the code at this stage"*. For Jack – 2, sending out a written guide is not enough as it's a challenge *"getting it to land"*. As such, participants call for induction training, training of staff, refresher courses and *"workshops maybe not just aimed at practitioners… aimed at senior management teams or boards, so influencing at a very high level."* (Jack – 2)

Learning and Training for All

The type of training, or learning appropriate for people at different stages and playing different roles in NGDOs, is also addressed. Jack – 2 feels that workshops for senior managers would be

> *"a different type of workshop… the why and how do you govern it and resource it across the organisation? I think they would have to not be instructive one-way workshops. They would have to be explorative and allowing people to work their way through maybe to think this way even if it has financial impact. If you get a board on board, I think you probably would see better traction."*

In highlighting these points, Jack – 2, like others, shows the importance of learning which engages people meaningfully in considering the bigger picture, in debating and deep discussion around principles and practices of ethical communications (Elisha – 2) and in critical analysis of their own practice. Andoline – 4 explained that she has participated in a range of courses *"on ethical communications and I've done the Dóchas Code training, that certainly crystalizes it, brings some principles, puts them out clearly what you can and can't do, that is very helpful"*. She highlights the need to focus on issues around online communications, consent and how to support and reflect diversity in communications. She suggests that *"if you're doing online webinars, people should be encouraged to bring in participants from the countries they're talking about"* (Andoline – 4).

Critical Literacy Approaches

In terms of applying critical literacy approaches, Zoe – 4 talked about the importance of *"taking learners on a journey"*, connecting participants *"with what they were less familiar with"*, *"using images in a provoking way, and looking at the effect of seeing images. What does it feel like to see these images contrasted? But also to use visuals as a way to explore identity, power, understanding and knowledge."* (Zoe – 4) Zoe – 4 highlighted the importance of not just focusing on how NGDOs currently communicate or use images because *"it doesn't go very far, gets stuck back in the 'us', 'them', 'how to do better at this?' type conversations about how to represent the other side of people's lives, not just the miserable side, the happy side. It can become reductive."*

Alice – 1 also outlined the importance of taking a critical reflexive and analytical approach which can be applied to analysis of one's own organisation's communications in training –

> *"are you telling the whole story? Are you leaving something out of the story that's relevant? Is there, are there any words used that could be misleading or could be looked at as, maybe racist is too strong, are there words that could be offensive or could be misconstrued in the wrong way?… if this was an image of someone in your family, would you put it out there?"*

Alice -1 went on to mention that these are some of the questions in the Dóchas Code Illustrative Guide but that they can get lost in the middle of a big book. As such, she suggests identifying some of the most critical questions and producing them in a shorter guide or check list.

Illustrative Guide to the Dóchas Code

A few other participants made specific reference to the Dóchas Code Illustrative Guide and how they use them with members, students or participants on courses. There is a sense that guides are important to have 'to read' but that people don't tend to consult them widely. Chloe – 1, for example, explained: *"I had a re-read of those guidelines this morning, I had a look through them and I said, do you know what, they feel pretty spot on to me."* Laura – 2 expressed a similar experience: *"I think it's good to have the code, to have some kind of guidelines and when I started, it was my first INGO role, I had worked for Irish charities before. It was a good to read and take note of but again, I feel it is very relevant and a great framework but it's not something I open frequently, or anything."*

Decolonising GD Communications – Critique of Developmentalism, Racism and EDI

As indicated throughout this report, the momentum to challenge and change the language and images NGDOs use, to diversify and transform ownership and participation structures within development organisations and in relation to global education, and to decolonise meaningfully at all levels has been growing in recent years (Stein and Andreotti, 2006 Peace Direct, 2021). There is also a growing concern with how to decolonise organisations, with an emphasis on supporting structures of equality, diversity and inclusion (Dóchas Strategic Plan, 2021), along with anti-racism. Much of this is being driven by external pressures coming from movements such as the BLM movement. This calls on NGDO leaders to engage critically with organisational learning and change strategies with a view to ensuring that change is not surface-deep.

Equality, Diversity and Inclusion

Working groups to promote EDI within NGDOs have been established recently, with ongoing work in the area being promoted by Dóchas. While EDI is becoming the widely recognised side of this, its tendency to focus on 'the workplace' and 'workplace relations', though important, is more limited than what is required when it comes to ethical communications more broadly (Peace Direct, 2021).

Similarly, like many such policies, emphasis is often placed on the development of a policy rather than its implementation, with implementation being applied in technical rather than systematic terms. There are also concerns that EDI does not sufficiently deal with the colonial legacy of GD practice, organisational culture and institutional relationships. Thus, while existing EDI policies can provide support to organisations to begin to address diversity, with an emphasis on human resource issues like recruitment, and inclusion within existing governance, participatory and ownership structures, meaningfully addressing inequality, colonialism and racism requires a lot more. This is particularly the case in light of the complexity of many NGDO relationships which are not just between management and staff or 'in the workplace', but with communities and partners in a range of different and often vulnerable contexts. For our purposes here, there is also a need to emphasise the link between EDI and ethical communication, especially in light of the challenges for practice raised in this report. This, in addition to growing emphasis on 'localisation', requires deep and systematic focus on NGDO cultures.

Decolonising Development

Aligned with anti-racism, but going deeper still into intersectionality (e.g., linking anti-racism with gender or disability equality), challenging dominant cultures and trying to give voice to subaltern (marginalised, oppressed) experiences (Spivak, 1988), the literature on decolonisation has advocated the importance of challenging epistemological dominance (the dominance of particular ways of thinking) and first principles (taken for granted assumptions and values) (Stein and Andreotti, 2006). Taking us deeply beneath discursive practices and cultures, critical questioning and the search for pluralities moves EDI beyond the technical or the organisational level into addressing decision-making processes, values, embedded assumptions, organisational cultures and relationships.

The recent Peace Direct report (2021) offers a scathing criticism of racism in the aid industry and calls for systematic decolonisation of aid. In its report, 'Time to Decolonise Aid – Insights and lessons from a global consultation', Peace Direct situates the need for decolonisation in the unrealised promises to redress inequalities in the international aid system. It argues that

> "following the Black Lives Matter protests that evolved into a global movement in the summer of 2020, those working in the aid sector have been forced to confront the reality that their own work is steeped in structural racism, something which has been barely discussed or acknowledged until very recently. Decolonising development, humanitarian aid and peacebuilding – the movement to address and dismantle racist and discriminatory structures and norms that are hidden in plain sight in the aid system – is emerging as an urgent, vital and long overdue discussion which adds greater weight to the existing calls to transform the system. If policymakers, donors, practitioners, academics and activists do not begin to address structural racism and what it means to decolonise aid, the system may never be able to transform itself in ways that truly shift power and resources to local actors" (2021: 4).

Please see Appendix 10 for some of the key points emerging from the report.

Decolonising GD Communications

Insights from the Peace Direct Report help to emphasise the importance of the need to decolonise GD communications, and at various levels. Its relevance to the Irish context is supported by critiques of stereotyping, racism and colonialism still evident in some NGDO representations, according to participants in this research (Section 3). As many scholars of racism identify, racism is deep within structures and institutions, in practices, assumptions and cultures. It is not always obvious in individual intentions but regularly evident in what we do and say. In light of the above, decolonising GD communications among NGDOs involves challenging colonial, racist and modernist discourses and representations around development. This involves understanding and addressing the cultural, discursive, organisational and institutional processes which produce and reproduce forms of communication based on colonial assumptions and exclusionary practices and creating spaces for alternatives based on inclusivity, respect, equality and sustainability. While this language may seem very strong to some readers, it is worth noting the criticisms of NGDO representations in this report, especially among those participants from African countries living in Ireland.

Decolonising organisational practice, at its simplest, involves processes and practices, people and culture (Morris and Gomez de la Torre, 2020). Thus, in decolonising GD communications, diversity, equality and inclusivity are important. As GD communications affect a range of different groups, any changes which are made should 'include' these groups, at the very least. Alongside being congruent with participatory approaches espoused by many NGDOs, and the basic rights of all to determine processes which affect them, ensuring that those whose voices tend not to be heard, or who have been marginalised from decision-making around GD communications in the past, are prioritised, can lead to very fruitful, new ways of approaching age-old problems. These include, e.g., representatives of migrant groups, those who are involved in development projects, young people or people from other minority groups. Ensuring that those most directly affected by NGDO

communications are not only involved in discussions and decision making but are also central to the production of knowledge and 'content' for communications and decisions around them brings this an important step further. I explore some of these issues with reference to participant research findings below.

Participant Research Findings on Decolonising GD Communications

Throughout this report, I have highlighted various critiques of GD communications which participants identify related to coloniality, stereotyping, and the effects of NGDO communications on experiences of racism among black people and people of colour in Ireland. Similarly, we have seen that many reference the recent Black Lives Matter movement and the growing diversity of the population in Ireland and its influence on how NGDO communications are perceived and experienced here. There is a strong sense among participants that young people do not respond well to 'traditional' forms of GD communication. This is backed up by the World View research (McShane, 2021). It is also believed that young people are much more likely to complain than traditional loyal NGDO supporters, and to challenge NGDOs on their portrayal, in particular their portrayal of Africans in their public communications.

We have seen above the kinds of learning and training which are associated with decolonising GD communications. In the participant research, participants also identified other measures to be put in place with regard to representational practices and processes, people and culture.

Change the Language

In terms of decolonising representational practices, some people call for a change in language. This can dovetail with people telling their own stories and moving away from the language of *"beneficiaries"* (Elena – 4). As Charles – 3 explained, *"even the whole language about charity, or handouts, or aid recipients, how you describe people… we're trying to find a language more around collaborators, communities with whom we work… we need to try harder."* Hugh – 4 agreed. *"We're a work in progress"*, he explained with reference to the fact that *"language is not reflective of where we should be at… we still have to do a lot of work ourselves, but language builds things and sometimes that goes unsaid."* For Linda – 5, decolonisation involves changing *"the images, this whole white saviour thing. Moving away from projecting people as helpless to actually recognising the resourcefulness of the people and putting that forward rather than images of ourselves doing things. Talking about partnership more, respectful partnership, equal partnership more, where both sides have resources and exchange and common goals."* Steve – 4 feels that NGDOs *"should be conscious that they are in the area where there is a colonial history, there is even a slavery history there, a big history of how other parts of the world are portrayed by people from the West".* In so doing, he feels there's a need for much wider participation in how stories of development are communicated.

More Critical and Creative Engagement

In addition to comments about the need to change language, many participants feel that there have to be more creative and critical ways of engaging people more meaningfully in GD issues and concerns. Elisha – 2, for example, sees it as a creative challenge,

> "to challenge ourselves as fundraisers to see how we can dialogue… how do we reframe the message to overcome donor fatigue. How do we use the voices of beneficiaries more? This is stuff that we know needs to be done and we're challenging ourselves to do it. We're not in denial of that, so yeah, we're trying to push the bar more and more with it."

The importance of people framing their own stories, of diversifying content creation and of including those most affected in producing content and designing campaigns is highlighted in Section 3. Elena – 4 believes that organisations really need to reflect deeply on

> "the hows and whys of DRTV ads and so on. There's definitely something in that of how do you get people to care from a political and activist perspective and how do you get people to care from a financial perspective?" She feels that "if the moral obligation is to tell the story, the question is how do you tell the story in an ethical way that encourages people to act. That's the bit that I don't think we have right."

Max – 5 feels that

> "it's gone the wrong way in that it doesn't take into consideration that Ireland is changing and there's more people now settling in Ireland and the fundraising strategies need to change… we are in a globalised society and Irish society is changing, then there can't be one way of looking at things."

Change Organisational Cultures – 'It Will Not Be Business as Usual'

Julia – 5 and others talked about EDI and what she calls "this explosion about inclusion, diversity, what, what, and since George Floyd died, they want to employ people to show diversity". Julia – 5 explained that if it is not to be *"about ticking the box",* NGDOs need to know that it involves systemic change. As she put it, *"when you do that, it's not going to be business as usual. There's another layer of responsibility when you do that… and the other colleagues… they will need to be educated about these issues, about cultural sensitivity, about culture, self-awareness, about own behaviours… there will need to be that systemic change, big time".* She explained that it is better not to be employed into an organisation that expects things to remain the same, especially not as a token black person: *"I'm better off not getting my foot in the door in the first place. I want to go and work and contribute and change things and get changed".* Thus, she illustrates that increasing the diversity among those involved in NGDOs whether through employment or on boards, as

contractors or in active participation in GD communications practices and processes, implies that these practices and processes and organisations actually change.

While some people feel that the time is right, now, for deep, radical, systematic and comprehensive transformation of NGDO communications, the kind associated with processes of decolonisation, others are more cautious, focusing on equality, diversity and inclusion measures alongside the kinds of learning, leadership and regulation discussed in the sections above.

Follow the BLM Lead

Chloe – 1 believes that

> "the whole BLM movement over the last year or so has made people a lot more conscious of comms and messages. I would say, you know, others mightn't agree with me in the sector, I would think that in every organisation, we should be doing anti-racism training… I know in the UK, Bond have recently reviewed their code, especially with the recent context changes around BLM, so having the code and guidance is really good, training, the codes, but it's also mindset change, and cultural and mindset change doesn't happen overnight. I think the tides of public protest makes a big difference."

Referring to changes required at management level, and the need for education and training at that level, Chloe – 1 went on to say that it's also about *"the make up of boards and SMTs. If there's homogeneity … at the top of the organisation, that mindset shift won't happen on its own. You need to bring in the right people and diversity in boards and senior management teams is going to be critical to having cultural change."*

Summary of Participant Research – Decolonising GD Communications

As indicated here, decolonising NGDO communications involves different processes related to ethical communications at the levels introduced in Section 1. At the representational level, it is how people and development are spoken about, the images used, the stories told – challenging stereotypes, addressing binaries and ensuring that representations are inclusive and diverse. At the representational practice level, decolonisation is about ensuring that diversity and inclusion, and challenging taken for granted modernist and colonial understandings are embedded in the process around representations. These relate, for example, to questions around ensuring deep and meaningful consent; voice – ensuring diversity and that people speak for themselves; how photographs are taken, framed, stored and used; democratising decision-making in these and other aspects of communication, i.e., around various communications and fundraising campaigns, DRTV ads, education materials etc. At the organisational structural level, decolonising development communications involves ensuring that organisational and institutional strategies, governance and priorities around communications, advertising, fundraising, use of social media, campaigning and education, relationships with partners and communities organisations work with, all reflect equality, diversity and inclusion in the many processes, people and outcomes involved. At the organisational and institutional cultural level, decolonising communications involves addressing colonial and modernist organisational and institutional embedded assumptions, root narratives, beliefs and worldviews underpinning other levels of practice.

Decolonising development communications is hugely challenging as it requires significant change for many NGDOs in their representations, the processes and practices associated with them and in the underlying assumptions upon which development relationships and practices are constructed. It requires much more critique of accepted notions of development (arguments, assumptions, discourses etc), and active engagement with anti-racism and critical approaches to learning, as well as shifting the frameworks of meaning, organisational practices and cultures that NGDOs often rely on.

Analysis and Conclusions

Analysis and Conclusions

Introduction

Communications are central to everything that NGDOs do. What they say and show matters. How they say and show also matters; and who is 'saying' or 'showing' matters too. NGDO messages about development, about poverty and inequality, about climate and injustice, about governments and peoples and about the role of NGDOs and donations, communities or volunteers etc in realising development all matter. In and through their communications, NGDOs construct particular versions of the global development world through different stories and images and ways of story-telling and of using images. They do so in what is included and emphasised as much as in what's left out or under-stated. In so doing, NGDOs (along with mainstream and social media, and in their relationships with them), play a significant role in shaping the ways in which global development is understood and in how people respond to what's going on in the world. Through their communications, NGDOs help people to construct versions of themselves, for example, as 'developed' or 'underdeveloped', as 'donors' or 'activists', as 'concerned' or 'in need'. They also construct versions of problems in the world and of who can solve them, how they might be addressed and what issues are more urgent than others. These are based on well-established, though increasingly contested, norms around what constitutes development and the roles of government, NGDOs and aid therein, as well as on embedded assumptions about what works in development, what's important and what's needed to shape alternative futures. Thus, the stories that are told, the images used and the messages conveyed are extremely powerful and they can play positive or negative roles in global relationships of equality, justice and human rights.

Alongside these broader identity issues, through their communications, NGDOs also mediate their relationships with different communities and partner organisations around the world, with donors and publics. Through them they establish and reinforce their credibility and legitimacy, and build trust (or not). Such multi-directional communications are matched by the centrality of communications to enabling NGDOs to carry out their work of explanation, education and engagement, of seeking donations, of proposal writing and reporting, of campaigning and advocacy and of public engagement in all its forms. Whether or not an NGDO is successful in realising its aims and work programmes is significantly down to its ability to communicate effectively and to listen and relate to its various constituencies in these ways.

Effective communication is one thing. Ethical communication is quite another. Whether NGDO communications practices are considered ethical or not is often judged on the basis of the principles applied. In the Irish context, the principles outlined in the Dóchas Code are those, which thus far, have been agreed by NGDOs to encompass ethical communications. As outlined in this report, ethical communications are also about decision making and power, about who gets to speak and about how communications are structured at all levels in NGDOs and in the broader GD institutional context. Also, as evident here, principles of ethical practice need to go beyond an over-emphasis on individual dignity or reductive notions of context and truth. Participants highlight the importance of communications which include more emphasis on hope and complexity, on the collective and structural dimensions of GD challenges and responsibilities, and on communication diversity (broader ownership, more voices and experiences represented, different stories told etc).

This research set out to explore concerns, issues and challenges with regard to ethical communications among NGDOs in Ireland, with particular emphasis on the contemporary relevance of the Dóchas Code, nearly fifteen years after its agreement within the Irish GD sector. In

this section, I highlight some of the significant points which emerged in this research with regard to understanding ethical communications and supporting it in the future. Before doing so, I comment on the methodology and how this report might be read in light of it.

This research is designed to offer deep insights into ethical communications practices and issues among NDGOs in Ireland today. It is deep in the sense that it draws on the experience of sixty-one participants, many of whom are working in GD communications in NGDOs or in other organisations. While they work at different levels, including 25 senior managers and 13 section managers, they traverse different types of NGDOs from big complex multi-million-euro operations with many staff in Ireland, and internationally, working on a range of GD issues through different formats; to small organisations with a few staff working on a single issue or through one or two types of work. Alongside these participants, a number of people working in migrant organisations in Ireland were also approached to participate. Given the challenges of COVID-19 and the limits of time, only a few people from these organisations were able to participate in the end. People of African descent working in GD and some key informants complement and augment the experiences represented among those working in NGDOs. Their experiences, views and analyses demonstrate why it is so important to have ethical communications.

The research is also, of necessity, limited. This is partly due to the sample of participants involved and the qualitative approach chosen. I did not set out to include partners, contractors or communities that NGDOs work closely with in their communications. Though valuable, this would have involved much more extensive research. Insights from research of that type, which focuses on 'the people in the pictures' (Warrington and Crombie, 2017; Girling, 2018) is referred to and drawn on here to complement the primary research undertaken as part of this project. Similarly, as the methodology is qualitative, it was not designed to present a 'full picture' of the range of insights into ethical communications among personnel in or related to NGDOs in Ireland. Rather, a wide range of participants from within NGDOs in Ireland were invited to participate and most of those who came forward to do so were either interviewed, consulted through questionnaires or participated in a focus group discussion. As evident in the sections of the report above, their different perspectives are presented extensively and mostly in narrative form to allow their voices and experiences to come through as much as possible.

Understanding Ethical Communications

As outlined in this report, findings reveal a high level of interest in ethical communications among the NGDO staff in Ireland who participated in this research, stated commitment to the principles outlined in the Dóchas Code, and a shared sense that things have improved since its introduction. The latter is seen especially in terms of moving away from 'the worst' forms of stereotyped representations, encapsulated by many in 'the flies in the eyes' type image. In this research, DRTV ads stand out as the main carriers of this emblematic representation of traditional, undignified, victimising and charity-based communications still practiced by NGDOs. Looking beyond this stereotype of stereotypes, in particular as highlighted by people of African descent, concerns remain about many more subtle aspects of NGDO representations. At the same time, as in other research most participants talk about the need for more 'to be done', and about the ongoing tensions between fundraising requirements and the messages associated with fundraising on the one hand, and the need to engage people more meaningfully in public engagement and the more complex, sophisticated, hopeful messages that are congruent with that, on the other (Darnton and Kirk, 2011; Murphy, 2014; Dogra, 2012).

Signs of Improvement But…

Despite the many challenges with NGDO communications at different levels, this research highlights significant signs of improvement. Participants refer to more representations of agency and context in NGDO communications along with recognition of the need to represent people with dignity and equality. These are reflected in attempts to change language, to reflect relationships of solidarity and to move away from North/South constructions towards more global ones. Recognising the importance of 'people telling their own stories', and the need to move 'beyond a single story' and diverse communication strategies, the research indicates some progress towards the creation of alternative, more ethical communications practices among NGDOs.

Building on this progress requires significant commitment and leadership and some risk on the part of NGDO management, as discussed here. It also involves building on existing forms of regulation and support for ethical practice, which appear to be working in relation to other issues, e.g., the Common Humanitarian Standards and the IDEA Code on Development Education. Using existing regulation standards which exist in Ireland, such as the Charities Regulator's Governance Code and Guidelines on Fundraising and the Advertising Standards Authority of Ireland complaints mechanisms can also support any efforts made by NGDOs, as can drawing from examples from international research, ethical guidelines, learning opportunities and regulation processes.

The 'Five Levels' Approach

As the research shows that more needs to be done, findings suggest that it is important to understand and implement practices around ethical communications at a number of levels. The first of these is the level of representations, which are the visible or tangible face of ethical communications, i.e., messages, images, advertising campaigns and social media posts that NGDOs produce and disseminate. It is at this level of communication that stereotypes (Hall, 1997), simplifications (Manzo, 2008), transaction frames and victimising labels (Corbett, 2014), as well as more active, solidarity and complex tropes and narratives become established and reproduced as common representational practices. These carry the 'surface frames' that Darnton and Kirk (2011) and Murphy (2014) analyse as well as narrative practices, binaries (Dogra, 2012; Nair, 2013; Zarzycka, 2015; Hammett, 2019), contradictions and ambiguities (Dogra, 2011; Dogra, 2014) associated with colonial, developmentalist and racialised discourses. It is also at this level that alternatives can be presented, including images and messages which frame people with dignity (Warrington and Crombie, 2017) and agency (Girling, 2018), situations in context and with complexity, and relationships of solidarity.

Much of the focus of ethical communications in the literature is on this 'top' level of representational practice – highlighting the implications of limited and damaging stereotypical representations on understandings of people and places (Dogra, 2007). This has led to efforts to challenge misrepresentations, which give a 'false' picture of GD or which have the effect of leading to distorted understandings and inadequate global responses to complex GD challenges. It has also influenced the introduction of codes of good practice, which support ethical practice but which can fall short of focusing substantially on representations through a generalised emphasis on 'catch all' values and principles with inadequate implementation procedures. The human cost of stereotyping and unethical representations comes across very strongly in this research, especially in contributions from people of African descent, who see NGDO colonial and racializing practices as contributing to racism in many different ways. Decrying the binaries, paternalism, distortions and misrepresentations of NGDO communications, and DRTV ads in particular, they highlight their effects on assumptions people bring to encounters with them as well as on the bias, bullying and

abuse many experience. They communicate anger and frustration at these organisations for not taking their concerns and broader responsibilities more seriously and call for anti-racism to be central to NGDO communications and highlight the importance of decolonised communications' practices.

Underpinning the representational level is that of the representational practice level, where decisions are made and institutional practices are employed which shape representations. These include approvals processes; recruitment practices and roles around communications and fundraising; how photographs are taken, stored and used and by whom; social media (fundraising and/or public relations) content generation and oversight; liaison between staff and those working with NGDOs and design and editing practices. It is at this level that individuals and groups act as strategic implementers of ethical communication practice between what's said and the deeper levels of influence coming from the organisational structural level of strategies, governance and priorities on the one hand, and the institutional cultural level, on the other. When codes of good practice focus on this level, they provide insight into how communications personnel might manage stories, photographs, video and consent, liaison with partners and data protection issues. The Illustrative Guide to the Dóchas Code is directed at this level as are the Bond guidelines on Putting the People in the Pictures First.

While the level of representational practice is very influential in ethical communications, this research shows that there are tensions within NGDOs in terms of communication priorities at this level. How these manifest in decision-making priorities and roles depends on the overall constitution of the NDGO in terms of scale, purpose and make up. Personnel across NGDOs often have different priorities and pressures in their everyday decision making around communications. This is especially highlighted here among bigger, more complex, public fundraising organisations and in relation to those who respond to emergency humanitarian crises around the world. In these cases, as evident in this research, fundraisers describe being under pressure to reach their KPIs, and their decision-making is influenced by a view of ethics which prioritises the need for funds to meet the needs of the communities they see themselves serving, while aiming for truth and accuracy. Communications personnel involved in this research are more likely to be influenced by a drive for public engagement, though how this is understood often oscillates between an emphasis on fundraising and other forms of activism. Education personnel, and organisations with an education focus, tend to be much more critical of NGDO communications than others within NGDOs. They understand the pressures that their colleagues in fundraising (and often in communications) are under, and that their jobs and the work of their organisations are often dependent on the kinds of representations they do not agree with. At the same time, they worry about the effects of communication strategies which are based on transaction frames and North-South or 'us' and 'them' binaries; which represent people and governments in the global South as lacking agency; and which emphasise the role of NGDOs and aid in addressing complex GD challenges while obfuscating the role of structural and global economic and social systems in contributing to these challenges in the first place (Orgad, 2015; Dhanani, 2019). This resonates with critiques of NGDO communications as whitewashing the history of colonialism from GD organisation and practice and of tending to see NGDOs as the solution rather than part of the problem.

It is important that efforts towards equality, diversity and inclusion and decolonisation of communication structures and practices should be directed also at this structural level. This includes ensuring that brand and other guidelines of good practice are updated to include considerations around diversity and inclusion. At this level, leadership can play a significant role in supporting or acting as a barrier to ethical communications' organisation and practice within NGDOs and within the GD sector. The roles of senior management and boards of management are crucial in relation

to how communications are resourced, the forms of communications encouraged and where the priorities lie. As evident in this research, some CEOs are regarded as inspirational role models who lead on ethics, whereas others are talked about as needing to do a lot more to support staff to make decisions about GD communications which support ethical practice. This includes increased resourcing through egalitarian, inclusive and consent-driven content gathering and development processes. It also includes commitment to research on alternative more ethical and inclusive advertising strategies. At this level of implementation, NGDO management efforts to improve practice also need to support greater representation of minorities in employment in NGDOs, where partnership arrangements between NGDOs and those they work with are organised in inclusive or exclusive ways; where participant photographers and video makers are engaged or Southern professionals are more often employed. This is also the level at which processes of accountability and transparency intersect with considerations over ethical issues, e.g., like child protection, safeguarding and/or consent. Here again, priorities over the form and type of accountability, over where accountability is directed and how it is undertaken are significantly shaped by senior management. Relationships with institutional donors also play a significant influence on the level of structural implementation in NGDOs.

While the structural level of implementation is significant in its influence on representational practices, it is also important to recognise the deeper cultural level which underpins this. With its embedded assumptions and root narratives, beliefs and worldviews about what's important in development, in fundraising, in terms of relationships in the wider world and the role of GD communications, the deeper cultural level has a phenomenal influence over the types of communications strategies employed by NDGOs, over what's taken for granted as acceptable or not, and over what seems reasonable or possible to change.

It is at this deeper cultural level of embedded assumptions where post-development and post-colonial critics highlight the need for NGDO personnel to question their taken for granted assumptions about development and their role in reproducing colonial and racialised representations. Andreotti's (2012) 'HEADSUP checklist' sums up the kinds of critical questions NGDOs need to ask about the effect of ethical communications with regard to their representations, assumptions and practices around power, ethnocentrism, ahistoricism, depoliticisation, salvationism, simplifications and paternalism.

Supporting Ethical Communications in the Future

The Dóchas Code

This research highlights how influential the Dóchas Code has been among NGDOs in Ireland in terms of how they frame ethical communications. Similarly, some of the processes initiated by Dóchas in 2007 are still being followed through the integration of the Dóchas Code in training, approvals processes and considerations when developing campaigns. Overall, the Dóchas Code is held in high regard by participants in the research, though their belief in its efficacy is waning, with some describing it as 'lacking teeth'. Given poor monitoring and little focus on it by Dóchas over the past five years, this research shows that it needs to be revised and updated and that its implementation needs to be strengthened and resourced. A major finding of this research is that a code alone is not enough, ethical communications need to be supported and resourced at all levels of organisational and institutional communications practice and culture.

NGDO Management Leadership

The important role that CEOs, boards of management and senior management teams play in supporting ethical communications (or not) emerges very strongly in this research. As such, they are at the fulcrum of initiating and supporting change. This involves addressing power relations and difficult, time-consuming processes of cultural change. Translated into deeper and more systemic support for ethical communications, this can involve resourcing EDI and decolonising communications through deeper, more meaningful, broader consultation around communications and more democratically organised and inclusive content development, public engagement, advertising and fundraising processes at every level. This includes training and learning for all involved. It also suggests the need to create a 'learning organisation', a culture of reflection and critical questioning of how power works within the organisation to include and exclude, and of the values prioritised in communications strategies. An example of what this can lead to is the announcement by Save the Children in the UK in 2020 that it would be an 'anti-racist organisation'. Such a move requires significant leadership and risk on the part of any CEO or board of management, but it shifts the frame of their engagement in this area and their stated commitment around responsibility, voice and power.

Where managers lead on changing language, representational practices and assumptions around 'us' and 'them' and other binaries, along with fundraising strategies and targets, staff are more enabled to follow. This is also the case in terms of the significant role they can play in ensuring a central role for partners, people of African descent and other diaspora communities, and other vulnerable groups in shaping communications strategies and practices. At a broader sectoral level, managers can also play a crucial liaison role with institutional funders and their broader EU and international NGDO networks, including in relation to international standards they are party to, to ensure that a move to more integrated ethical communications is better supported institutionally and with resources within NGDOs.

Dóchas Leadership

Dóchas has played a significant role in promoting this area of work over many years in Ireland, and through its contacts in the EU more broadly. This has included its work to ensure sign-up to the Dóchas Code, in gaining recognition of its importance by Irish Aid in its funding applications, in resourcing its implementation, and in supporting organisations around it. As its emphasis shifted from ethical communications towards other areas of work, Dóchas's role of standard bearer in this area has fallen away. This research suggests that Dóchas can still make a significant contribution to ethical GD communications, albeit through the creation of new, more systematically implemented standards.

Participants in this research, and research on ethical communications more broadly, suggest that organisations can't 'go it alone' with ethical communications. Given the power relations involved and that ethical communications are so significantly shaped by sector cultural norms, tackling assumptions and practices at this level is essential. Participants in this research suggest that if the bigger NGDOs take a lead through Dóchas, more will feel able to follow. Through embracing their power to change and to help shape alternative cultures and framings, bigger NGDOs can have a significant influence on what happens around ethical communications, or whether anything does, in the sector.

This research outlines an important role for Dóchas in bringing NGDOs and other stakeholders together to explore ethical communications challenges and the responses required in the Irish GD

sector. Some talk about creating safe spaces, about the need for more conversations to address the tensions involved. Such a task is not easy but it is important, as contributors involved in Bond in the UK suggest, especially when bringing people who have different perspectives and interest together to agree ethical communications standards. This can lead to 'lowest common denominator' results, or ones which are confined within existing limits of current thinking. Engaging people outside the GD sector in consultation, especially those most affected by NGDO representations, may help to avoid falling back into tired conversations which lead nowhere. Instead, it may open up alternative understandings and perspectives. This is also imperative considering the effects of NGDOs felt acutely by diaspora communities as outlined by Ademoulu (2021), and confirmed here by research participants of African descent.

The Peace Direct report (2021) complements the broader questions identified above (Andreotti, 2014) and gives examples of how NGDOs and the GD sector can examine their role in perpetuating colonial stereotypes and framing, and the impact of this on relationships between people of different ethnic identities and origins in Europe and globally. Warrington and Crombie's (2017) research suggests the importance of active engagement by NGDOs with 'the people in the pictures' and their call for honest portrayal which is more balanced than current representations. In Ireland, Dóchas can play a key role in developing these forms of consultation through member-organisation links and building on any work already happening in this area.

While it is very important to involve those typically considered to be 'outside' the GD sector in consultation around supporting ethical GD communications in the future, it is also important for Dóchas to ensure that those currently responsible for producing content and for engaging with stakeholders are central to any such processes. This includes communications and fundraising personnel and it chimes with the constructivist approach to peer regulation discussed by Berghmans (2017). Where Dóchas prioritised the roles of code champions in the past, many of these were development education or junior personnel with little influence, and decision-making happening at a higher level or elsewhere in organisations. While development education personnel can play an important role in supporting ethical communications, responsibility for its future in the GD sector should not be primarily theirs.

The central role that NGDO managers need to play is discussed above. This is also the case when it comes to Dóchas work and consultation around supporting ethical communications in the future. A significant challenge to ethical communications that NGDO managers, together with Dóchas, need to address is that of fundraising for humanitarian crises (Nolan and Mikani, 2012; Orgad, 2013, 2015, 2017; Dencik and Allan, 2017). Fundraisers in this research point to the increasingly competitive environment where NGDOs are in 'a race to the bottom' with each other for funding. Aware that members of the public, who are likely to donate, tend to respond to the most shocking, emotive and stereotypical communications, and of urgent needs in different circumstances, as suggested here, they rely on tried and tested communications strategies. In doing so, they gamble that enough donors will continue to respond to these communications and that there will be little or no backlash in terms of lack of public trust, donor fatigue or criticism on social media. Fundraisers who often talk of testing the impact of their advertising campaigns, and who are acutely aware of KPIs, know that how they frame a story has an impact on the organisation's 'bottom line'. In certain circumstances, their imperative to raise as much money as possible for urgent need seems to trump any other value – for long-term engagement, which can shape understanding and more sophisticated donor responses; for dealing with the effect of their communications on experiences of racism in Ireland, which can be dismissed as being about upsetting the sensibilities of middle-class Africans; and of trying different fundraising strategies based on less financially effective, but more ethically sound communications. Some fundraisers in this research do not see fundraising

communications as less ethically sound than other forms of communication. They regard ethics as tied up with accurate and undistorted representations and fulfilling their responsibilities to 'the poorest' people. Others suggest that there are compromises and exceptions made around ethics in the case of fundraising and that NGDOs have other responsibilities beyond fundraising for emergency or development situations. It is important that these different perspectives are addressed in Dóchas's work in this area in the future.

Addressing the tensions and challenges presented by fundraising for ethical communications points to the need for leaders within NGDOs to make difficult choices in support of anti-racism, decoloniality and EDI. It also highlights the need for Dóchas and NGDO managers, along with their institutional donor partners, to address the broader institutional funding context constraining ethical communications. The Reality of Aid report (2021) clearly shows the lack of fulfilment by governments of their financial commitments to addressing the global crises of poverty, inequality, COVID-19 and climate injustice. This point is reiterated here by one senior fundraising manager who argues that if NGDOs are to be encouraged to fundraise ethically in humanitarian crises situations, they need to be financially supported by institutional donors to do so. His point is that NGDOs need unrestricted funding, urgently, and that the best way to get it is by relying on traditional, stereotypical or sensationalist fundraising strategies. One could argue that NGDOs committed to ethical communications need no such incentives or that the moral argument should outweigh the pragmatic one. While this may be the case, it is important to acknowledge that in the competitive market of global NGDO fundraising, the race to the bottom of ethical communication standards seems to be winning. Unless Dóchas and NGDO managers address this seriously, efforts towards ethical communications are likely to be quite limited. As such, Dóchas and its EU partner networks may, given strengthened provisions in this area in Ireland, be able to work together with EU and UN institutions and donors on tackling this issue. Engaging with Irish Aid to work with their EU, OECD and UN counterparts may signify an important opportunity for Dóchas to gain wider institutional support for ethical communications practice. Apart from having an influence on their funding of humanitarian situations, a renewed emphasis on ethical communications may have an impact on other NGDOs and aid agencies more broadly. This is especially the case if links are made with other organisations advancing anti-racism and decolonisation strategies in tandem with ethical communications.

Regulation and Accountability

In addition to the need for leadership, consultation and involvement of various stakeholders in meaningful engagement around ethical communications and decolonisation, this research highlights the importance of understanding and addressing communications not only in terms of values and principles but in relation to power. Thus, as institutions and culture are significant drivers of communications practices, they are essential to realising ethical practice. This research suggests the need for more systematic regulation and accountability in this area. Good will is not enough, and rhetoric around good practice or sign-up to codes only goes so far.

The need for updated and revised standards and much more stringent implementation of them across the sector emerges as a key finding in this research. Like much of the existing research on peer-regulation, they support peer-regulation because it is good for building ownership and learning. At the same time, as with the Dóchas Code, peer regulation can be poor when it comes to translating principles into practice. Some form of more systematic mutual accountability regulation is needed (Deloffre, 2016). Deloffre argues that organisations are more likely to remain committed to a sector-wide strategy on ethical communications based on their shared interest in social learning and collaboration. Here, participants call for some form of oversight which gives any agreed

standards of ethical communications more teeth. While most participants in this research tended to favour a soft approach to regulation, some, especially those of African descent, have lost patience with 'softly, softly' approaches and call for organisations to be held to account. Thus, a 'third way' approach to regulation appears necessary which builds ownership and mutual accountability on the one hand but has some form of external regulation on the other. Using existing regulation systems and institutions could complement such an approach, as indicated above.

Learning

Regulation and leadership can enable and be supported by deep engaged forms of learning. Though many participants in this research talk about the need for training, most highlight the importance of this including managers and boards of management. The idea of a 'learning organisation' (Pettit, Roper and Eade, 2003) turns learning from an individualised half an hour exercise into something which is built systematically into organisations' processes, and which addresses the structures and decision-making processes of NGDOs. As highlighted here, while learning can benefit from specialised guides, these are not enough. Similarly, technical training falls short of the kind of reflective, critical learning processes required to engage with practices, assumptions and organisational cultures shaping GD communications. As such, learning based on critical pedagogy and reflexivity which supports anti-racism and decoloniality is particularly useful for addressing ethical communications challenges at all levels of NGDOs.

Conclusion

This report highlights the challenges and importance of shifting the lens on GD communications. There is nothing easy about representing GD in its complexity or of communicating in ways that ensure dignity and human rights, while giving voice to people's various experiences, and recognising the interconnections of global processes of inequality and injustice. This is especially so when the remnants of decades of GD communications, characterised by colonial stereotypes, simplifications, charity narratives and the disconnections of distance, are still evident. Despite these challenges, this research offers hope and opportunities for the future. Contributors provide strong arguments for the need to address systemic racism and Ethnocentrism and to refocus ethical communications on organisational decision-making and culture. Their many practical suggestions, outlined in this report, may help NGDOs to lead the way.

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Appendices

Appendices

Appendix 1: Interview Topic Guide

Sample Interview Topic Guide for Participants in Interviews for the Communicating International Development Research – Dr. Eilish Dillon, Maynooth University, Dec. 2020

Section 1 – Organisational Information

Date _____

Consent form _____

Organisation _____

Section 2 – NGO Communications

1. What do you think of how international development is communicated by IDNGOs in Ireland?

2. What messages do you think are most prominent in IDNGO communications about….

   What constitutes international development challenges, problems and solutions?

   Relationships between different countries around the world?

   The role of politics, economics, culture or the environment in international development?

   Who contributes most to development in different countries?

3. How would you describe the kinds of images that are most often used in IDNGO communications?

4. Do you perceive any changes in IDNGO communications in recent years?

5. What do you see as the most influential factors affecting the way IDNGOs communicate today?

6. What groups do you think have the most influence on Irish IDNGO communications and are there any groups you think should have more? Please explain.

7. What do you think IDNGOs in Ireland do well in communications around international development and what do you think they might improve upon?

8. How do you think IDGNO management can best contribute to improving IDNGO international development communications in the future?

9. How do you think organisational partners or other groups can best contribute to improving IDNGO international development communications in the future?

10. How would you describe the main images and messages about international development coming from your own organisation? Is it different to other, similar organisations? If so, in what ways and why do you think that is the case?

Section 3. The Dóchas Code and the Future of Ethical Communications

11. What's your level of understanding of the Dóchas Code of Conduct on Images and Messages?

   Understand it a little;

   A Good level of understanding;

   A very good understanding of it and how it should be applied

12. What do you think being a signatory to the Dóchas Code of Conduct on Images and Messages means? What do signatories have to do or not do?

13. How influential or not do you think the Dóchas Code is when it comes to IDNGO communications on international development in Ireland?

14. How would you rate the Dóchas Code of Conduct on Images and Messages in terms of its effectiveness for ensuring ethical communications on international development?

15. As a general rule, do you think having a voluntary code on ethical communications, like the Dóchas Code, is a good idea or not? Why.

16. If you think it is not a good idea, how would you suggest that ethical communications be promoted and supported among IDNGOs in Ireland in the future?

17. Is there any specific role that you think Irish Aid and other institutional funders can play in promoting ethical communications?

18. Do you have any other suggestions for Dóchas and for IDNGOs with regard to how to promote ethical communications in the future?

Thank you very much for your participation in this research.

Appendix 2: Questionnaire – Introduction and Link to Microsoft Form

Communicating International Development

Thank you for agreeing to participate in this research on 'Communicating International Development' among international development NGOs in Ireland. The research was designed in association with Dóchas, the network of international development non-governmental organisations (IDNGOs) in Ireland, and funded by the Irish Research Council under a New Foundations Research grant in 2020.

By completing this anonymous questionnaire, you are agreeing to the data you submit here being used in research and subsequent publications on the topic by the principal investigator, Dr. Eilish Dillon, Maynooth University Department of International Development. If you would like more information about the research, please contact Eilish by email at: eilish.dillon@mu.ie

There are 28 questions to answer here and it should take no more than 15 – 20 minutes to complete. I really appreciate your time and interest and thank you for sharing your views and experience on this topic, Eilish – November 2020

The questionnaire is available to view on Microsoft Forms at the following link: https://forms.office. com/Pages/ResponsePage.aspx?id=zPVUFDW7hUa72YYh_YBVySG0M-sYf7hCr-u6zxmT301UM kgyUURVTkNJQkU0N0Y1WE9BVk5aTDVaVS4u
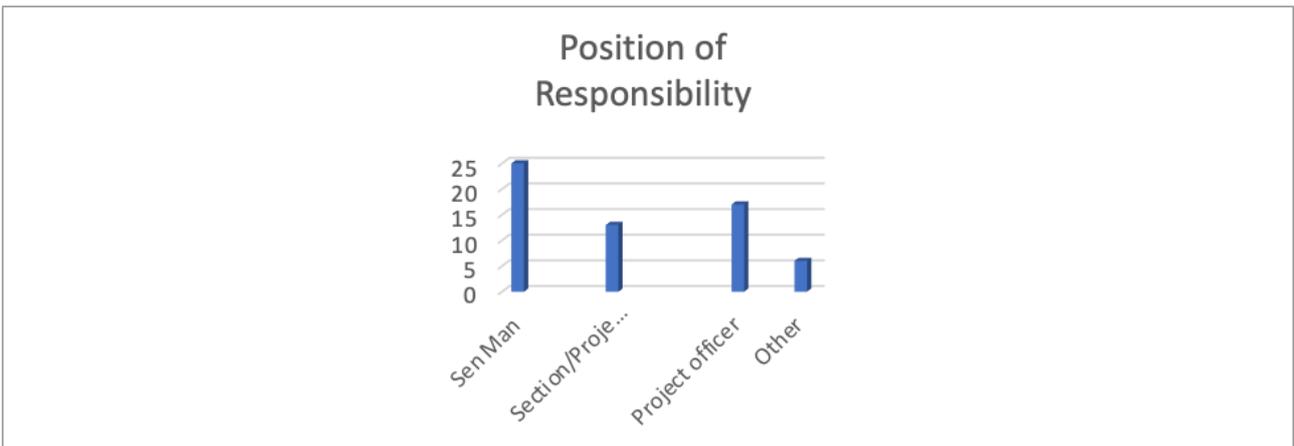
Appendix 3: Profile of Research Participants

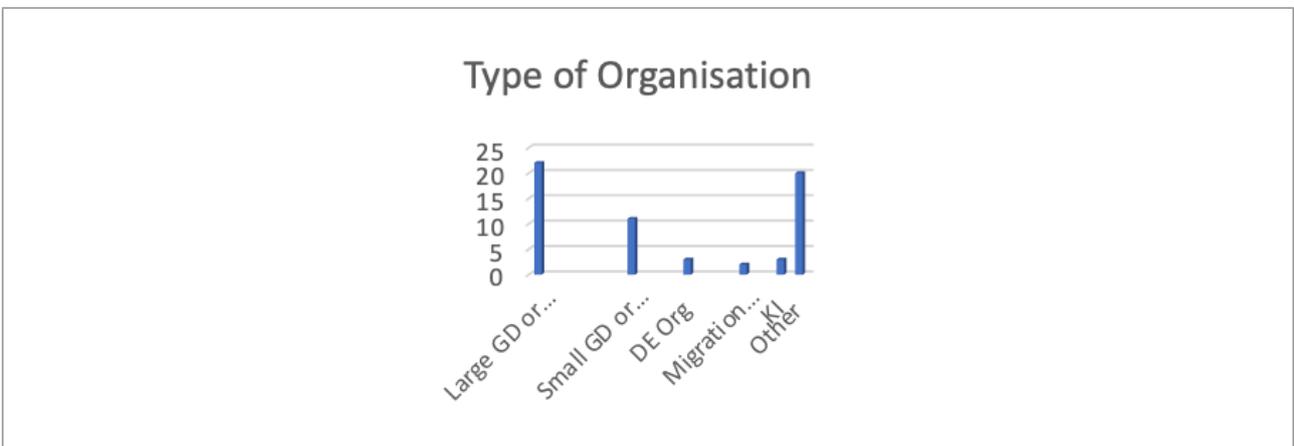**Total: 61 – Interviews: 36; Focus Group Discussions: 13; Questionnaires: 12**

Gender: Women – 42; Men – 19
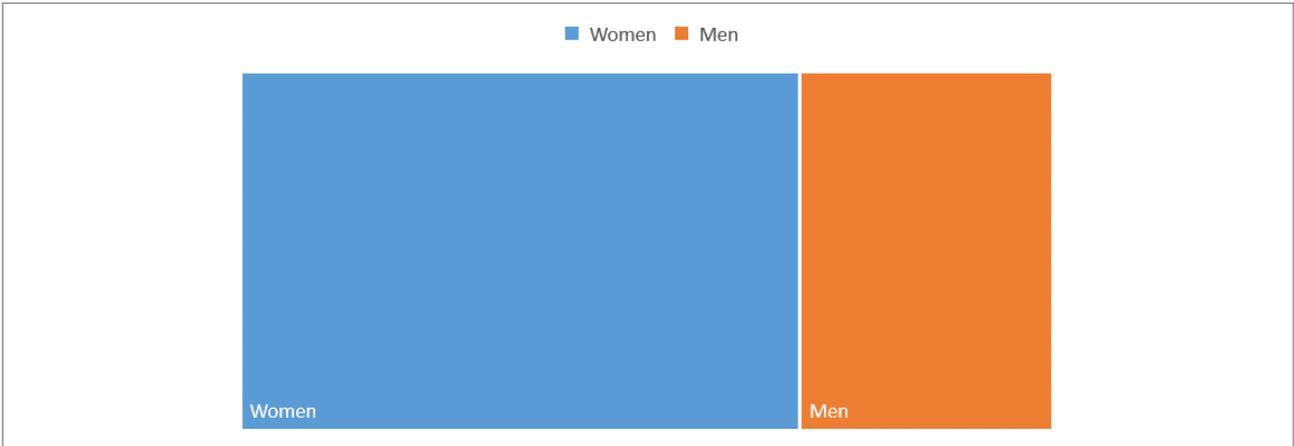
Position of Responsibility:

Organisation Category

Appendix 4: List of Organisations Participants Work With

Action Aid (Ireland)	Dóchas
Action Aid (International)	GOAL
Aidlink	Holy Rosary Sisters
Akidwa	Irish Development Education Association
Amref (UK)	Irish Aid
Christian Aid (Ireland)	Misean Cara
Comhlámh	Plan International (Ireland)
Concern Worldwide	Selfhelp Africa
Concern Worldwide UK	Sightsavers (Ireland)
Dublin City University	Tearfund
Department of Foreign Affairs	
	Other

Appendix 5: The Dóchas Code of Conduct on Images and Messages – Values, Commitments and Implementation Mechanisms (2007)

The Code is driven by a strong commitment to the following non-negotiable values:

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.

The following guiding principles underpin the Code:

Choose images and messages based on these values;

Truthfully represent any image or depicted situation both in its immediate and in its wider context so as to improve public understanding of the realities and complexities of development;

Avoid images and messages that potentially stereotype, sensationalise or discriminate against people, situations or places;

Use images, messages and case studies with the full understanding, participation and permission of the subjects (or subjects' parents/guardian);

Ensure those whose situation is being represented have the opportunity to communicate their stories themselves;

Establish and record whether the subjects wish to be named or identifiable and always act accordingly;

Conform to the highest standards in relation to human rights and protection of vulnerable people

By becoming signatories to the Dóchas CoC, signatories agree to the following implementation measures:

Make the existence of the Code known to the public, all partners, suppliers and contractors.

Provide a feedback mechanism for the public to comment on your organisations application of the Code.

Communicate your organisation's commitment to the Code in all public communications.

Ensure that senior management takes responsibility for implementing and adhering to the Code.

Assess your organisation's adherence to the guiding principles of Code on an annual basis.

Train staff on the use of images and messages.

Share your implementation experience with other signatory organisation.

Report to Dóchas annually on your implementation of the Code.

Appendix 6: Dóchas Values

To become a member of Dochas (2020: 11/12), "existing members must be satisfied that the aims, objectives and practice of the applicant organisation reflects the spirit and intention of Dóchas. In particular, that the organisation commits to upholding a commitment to the highest levels of accountability, including in relation to governance, financial management, safeguarding, and promoting positive images and messaging.

Applicant organisations must indicate compliance with the following standards:

(a) The Charities Governance Code (if they are a charity)

(b) Dóchas Charter

(c) The Dóchas Code of Conduct on Images and Messages

(d) Dóchas Safeguarding Code"

Appendix 7: Research on Peer Regulation among NGDOs – compiled by Gerard Ellul

In her paper, 'Global Accountability Communities: NGO self-regulation in the Humanitarian Sector', Maryam Deloffre (2016) discusses her research where she used a process-tracing mechanism for the case of the Humanitarian Accountability Partnership – International (HAP-I), in order to establish how processes evolved in the determining of rules, standards and practices for accountability. The research first looked at the HAP-I precurser, the Humanitarian Assistance Ombudsman (HAO) and traced how the many misgivings concerning this mechanism caused changes to be implemented, which eventuated in the HAP-I.

In summary, the following salient points are noted:

- The HAO promulgated a model of accountability based on the logic of control where the Ombudsman would apply collective rules and standards to constrain NGO activity and punish non-compliance.

- Critics viewed the suggested policing role of the Ombudsman and its potential power to sanction NGOs as an unacceptable violation of NGO independence.

- Moreover, those agencies that viewed accountability as a process for enabling learning and improving quality, believed that the role of the HAO should be to facilitate and guide NGO efforts to improve their practices.

- Because of the strong reaction against the policing role of the HAO, in March 2000, (three years after the HAO was initiated), fifty senior representatives from key humanitarian organisations agreed to a two-year pilot study called the Humanitarian Accountability Project (HAP). During this meeting the majority of conference participants reached consensus on accountability to beneficiaries as the focus of their joint enterprise and supported the establishment of field trials to investigate how to develop accountability practices.

- Attempts to institutionalise the HAO failed mainly because of its logic of control, policing functions and technocratic definitions of accountability

- HAP-I achieved consensus around accountability practices through transnational and participatory decision-making processes and by linking accountability to beneficiaries to human rights norms.

- The participatory model of defining the collective standards included several working groups that convened NGOs from around the globe.

- The process of negotiating shared values and visions for collective accountability created a bond among humanitarian organisations and increased trust and collaboration.

- The global accountability of NGOs cannot be understood as a singular principal-agent relationship where salient donors impose financial and legal accountability standards upon NGOs. Instead, collective accountability practices are mutually negotiated by members of a community, which include NGOs, donors, affected populations, and others.

In attempting to fill the gap in research of the actual impact of HAP and Sphere policies, as discussed in her paper, 'The Regulation and Certification of NGOs', Angela Crack (2013) conducted a series of interviews with participants responsible for accountability policy from similar sized NGOs. The Sphere Project and HAP are compared from the point of view of the type of regulations used and the level of compliance needed, as well as a comprehensive history of how they came about. The Sphere Project has a Code of Conduct but no formal system of membership nor any system of verification or sanctions for non-compliance. HAP has a certification system valid for three years with extensive auditing and mid-term monitoring. (Crack, 2013: 7-8). Thus, as self-regulatory systems, they represent the spectrum from lenient to stringent. The participants were asked to comment on the effectiveness of peer-regulation based on their experience and awareness of trends in the sector. A number of findings are relevant to the present study:

- There was almost unanimous agreement that one of the greatest benefits of peer-regulation is that it generates intra-organizational momentum for change.

- There was consensus that one of the most valuable benefits of peer-regulation are the diverse learning opportunities; including training workshops, tools for policy gap analysis, case study materials, discussion forums and informal networking.

- Both HAP and Sphere promise reputational advantages to NGOs, but participants conceded that HAP is the most highly regarded because of its stringent requirements for certification. HAP's endorsement is seen as one of the most powerful signals of an organization's credibility both within and outside the sector.

- They were concerned that excessively bureaucratic procedures limit the extent to which accountability mechanisms can assist the organization in developing meaningful relationships with affected communities.

- It was widely acknowledged that donors were inclined to consider HAP as a credible signal of an organization's integrity because of its robust verification procedures.

- However, most participants had misgivings about HAP's compliance-based model, which could risk fostering a technocratic, 'tick-box' mentality towards accountability.

- The danger of HAP's model of accountability, founded on routine verification, is that it may have the unintended consequence of tempting its members to pursue tokenistic policies that can be portrayed in written reports as examples of good practice.

- The potential loss of certification, and the adverse attention that such a penalty would be likely to attract, could be a powerful disincentive to disclosure. Transparency, however, is essential to organizational learning, and improvement in performance is unlikely to be achieved if organizations feel inhibited from discussing their shortcomings.

- Nearly all of the participants argued that peer-regulation was not sufficient to inculcate higher standards of accountability.

In her later paper, 'The Regulation of International NGOS: Assessing the Effectiveness of the INGO Accountability Charter', Angela Crack (2018) explores through her discussion of member interviews, was conducted to ascertain the perceptions of the effectiveness of the NGDO Accountability Charter. The members of the Charter must report annually, and it has a complaints mechanism and a sanctions clause. The research is guided by comparing two theoretical positions. Club theory (based on principal-agent theory) suggests that members join to improve their performance – self-interest. Constructivist theory suggest members join "to produce an environment that promotes social learning and norm-compliant behaviour, by encouraging individuals to internalize and uphold norms" (Crack, 2018: 421).

Some findings pertinent to this study are as follows:

- The interview data suggest that both theoretical explanations have some traction: Organizations maintain membership of the Charter to satisfy a mixture of 'self-interested' and 'norm-guided' motivations.

- Interviewees noted three main benefits of the Charter. Firstly, it provides NGOs with a defence against actual or anticipated criticisms of poor accountability from the media and political opponents. Secondly, membership provides peer learning opportunities. Thirdly, the reporting process provides high-quality feedback that can be a useful impetus to boost standards of performance.

- The interviewees also noted some challenges. Concerns were raised that the low readership of the reports makes it problematic to maintain 'buy-in' at all levels of the organization. Also, some participants also perceived the reporting process as resource intensive, and several cautioned of the danger that reporting becomes a bureaucratic exercise rather than a real driver of change.

- Organizational learning is best achieved in a forum where actors can admit to failures without fear of punishment. This is difficult to achieve within a regulatory initiative, as actors may be disinclined to speak with candor if this will undermine the reputational signal sent to principals.

This aim of Denis Kennedy's research, as discussed in his paper 'The Inherently Contested Nature of Nongovernmental Accountability: The Case of HAP International' (2019) was to question the narrative put forward by most researchers that "social learning" and "deliberative dialogue" are the vehicles by which NGOs achieve consensus about accountability mechanisms. Through interviews and a process-tracing method (similar to Deloffre's (2016)) Kennedy notes how power imbalances also play a large role in the accountability consensus process and that contestation, struggle and conflict are at the heart of the implementation of whatever standards may have been originally agreed upon. The process tracing case study undertaken was that of the HAO morphing to HAP.

A brief summary of the findings are as follows:

- Agencies had different perspectives on the proper role of standards, particularly on the balance between punishment and incentives. One camp felt that humanitarian standards should be used to constrain and sanction deviant agencies; others viewed standards as flexible guidelines to facilitate efforts at learning and practice.

- The secretariat of HAP strongly encouraged certification but some agencies saw this and the process of certification as creating fear amongst the NGOs

- There was little, if any evidence to show that certification has a positive effect on the positive impact of the beneficiaries, thereby creating conflict amongst the members. The research pointed to the ideology of "quality assurance" accounting for the reason why the HAP secretariat pushed certification so much.

- Leadership styles and personalities within the secretariat (described by some interviewees as 'aggressive' and 'defensive') were obstacles to greater cooperation.

- The findings point to the persistence of power in shaping accountability initiatives.

Draft Report for Dóchas Board, 2012, Eilish Dillon (on behalf of the Dóchas Working Group of the DEG: Eilish Dillon, Mbemba Jabbi, Rebecca O'Halloran, Lizzie Noone, Holy Ramanankasina)

Key Findings from the Reveiw

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 global 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 selfassessment. Based on the Australian PQASSO/ACFGD 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 complemented 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.

Appendix 9: HEADS UP Check List

by Vanessa Oliveira (Andreotti)

HEADS UP is an educational tool to help people engage critically with local and global initiatives created to address problems of injustice. It is based on the principles that, if we want to work towards ideals of justice, we need to understand better the social and historical forces that connect us to each other.

For example, if people saw many young children drowning in a river, their first impulse would probably be to try to save them or to search for help. But what if they looked up the river and saw many boats throwing the children in the water and these boats were multiplying by the minute? How many different tasks would be necessary to stop the boats and prevent this from happening again? I suggest there are at least four tasks: rescuing the children in the water, stopping the boats from throwing the children in the water, going to the villages of the boat crew to understand why this is happening in the first place, and collecting the bodies of those who have died – honoring the dead by remembering them and raising awareness of what happened. In deciding what to do, people would need to remember that some rescuing techniques may not work in the conditions of the river, and that some strategies to stop the boats may invite or fuel even more boats to join the fleet – they may even realize that they are actually in one of the boats, throwing children with one hand and trying to rescue them with the other hand. Therefore, I suggest that education, more than the media, should help people in the task of learning to 'go up the river' to the roots of the problem so that the emergency strategies down the river can be better informed in the hope that one day no more boats will throw children in the water. Going up the river means asking questions such as: What creates poverty? How come different lives have different value? How are these two things connected? What are the relationships between social groups that are over-exploited and social groups that are over-exploiting? How are these relationships maintained? How do people come to think and relate like this? What are the roles of schooling in the reproduction and contestation of inequalities in society? What possibilities and problems are created by different stories about what is real and ideal in society? When do institutionalized initiatives, such as the human rights declaration or military interventions, become helpful in promoting justice and when do they help reproduce the problems they are trying to address? If people believe in the human rights declaration, does it mean they are good people and not part of the problem? How would people respond if they realized that bringing justice to others meant going against national/local interests? Why and for whose benefit are relationships among people framed through and mediated by the Nation States identified in their passports?

HEADS UP was designed as a possible entry point to these types of questions. It proposes that if education is to prepare people to engage with the complexity, plurality, inequality and uncertainty of our inter-dependent lives in a finite planet, we need to 'raise our game' and expand the legacy of possibilities that we have inherited:

- we need to understand and learn from repeated historical patterns of mistakes, in order to open the possibilities for new mistakes to be made

- we need more complex social analyses acknowledging that if we understand the problems and the reasons behind them in simplistic ways, we may do more harm than good

- we need to recognize how we are implicated or complicit in the problems we are trying to address: how we are all both part of the problem and the solution (in different ways)

- we need to learn to enlarge our referents for reality and knowledge, acknowledging the gifts and limitations of every knowledge system and moving beyond 'either ors' towards 'both and mores'

- we need to remember that the paralysis and guilt we may feel when we start to engage with the complexity of issues of inequality is just temporary as it may come from our own education/socialization in protected environments, which create the desire for things to be simple, easy, happy, ordered and under control

HEADS UP aims to support people in moving from naive hope towards skeptical optimism and ethical solidarities where we learn to face humanity, the world and our place in it without fear and with courage and strength to go through the difficulties and discomforts of confronting our past legacies and current inequalities in order to pluralize the possibilities for living together in the present and the future. Ultimately, this about remembering how to love, to be open, and to be taught in a plural world where justice starts with the forms of relationships we are able to create.

HEADS UP is a checklist that can be used to start conversations about local/global initiatives (documentaries, campaigns, teaching resources, etc) that may inadvertently reproduce seven problematic historical patterns of thinking and relationships:

Hegemony (justifying superiority and supporting domination): 1a)does this initiative promote the idea that one group of people could design and implement the ultimate solution? 1b) does this initiative invites people to think about its own limitations?

Ethnocentrism (projecting one view as the only moral option): 2a) does this initiative imply that anyone who disagrees with what is proposed is immoral? 2b) does this initiative acknowledge that there are other logical ways of looking at the same issue?

Ahistoricism (forgetting historical legacies and complicities): 3a) does this initiative introduce a problem in the present without reference to why it is like that and how 'we' are connected to that? 3b) does this initiative offer a complex historical analysis of the issue?

Depoliticization (disregarding power inequalities and ideological roots of analyses and proposals): 4a) does this initiative present the problem/solution as disconnected from power and ideology? 4b) does this initiative acknowledge its own ideological location and offer an analysis of power relations?

Salvationism (framing help as the burden of the fittest): 5a) does this initiative present people 'in need' as helpless victims of local violence or misfortunes and helpers or adopters as the chosen 'global' people capable of leading humanity towards its destiny of order, progress and harmony? 5b) does this initiative acknowledge that the desire to be better than/superior to others and the imposition of aspirations for singular ideas of progress and development have historically been part of the problem?

Un-complication (offering easy solutions that do not require systemic change): 6a) does this initiative offer simplistic analyses and answers that do not invite people to engage with complexity or think more deeply? 6b)does this initiative offer a complex analysis of the problem acknowledging the possible adverse effects of proposed solutions?

Paternalism (seeking affirmation of superiority through the provision of help): 7a) does this initiative portray people in need as people who lack education, resources, civilization and who would and should be very grateful for your help? 7b)does this initiative portray people in need as people who are entitled to disagree with their saviours and to legitimately want to implement different solutions to what their helpers have in mind?

Appendix 10: Time to Decolonise Aid: Insights and lessons from a global consultation – Peace Direct, 2021

Peace Direct begins its report by situating it in the context of unrealised promises to redress inequalities in the international aid system, especially those agreed at the World Humanitarian Summit in Istanbul in 2016. They argue that

"Following the Black Lives Matter protests that evolved into a global movement in the summer of 2020, those working in the aid sector have been forced to confront the reality that their own work is steeped in structural racism, something which has been barely discussed or acknowledged until very recently. Decolonising development, humanitarian aid and peacebuilding – the movement to address and dismantle racist and discriminatory structures and norms that are hidden in plain sight in the aid system – is emerging as an urgent, vital and long overdue discussion which adds greater weight to the existing calls to transform the system. If policymakers, donors, practitioners, academics and activists do not begin to address structural racism and what it means to decolonise aid, the system may never be able to transform itself in ways that truly shift power and resources to local actors" (2021: 4).

Based on an online consultation with over 150 participants convened to discuss structural racism and how to decolonise aid, Peace Direct compiled its report with a number of key findings. These are (quoted: p.5/6):

"Many current practices and attitudes in the aid system mirror and are derived from the colonial-era, which most organisations and donors in the Global North are still reluctant to acknowledge. Certain modern-day practices and norms reinforce colonial dynamics and beliefs such as the 'White saviour' ideology visible in fundraising and communications imagery used by INGOs, to the organisational structures of INGOs in the Global South and the attitudes of some White international aid workers working in Global South.

Aid flows between former colonial powers and former colonised regions often mirror their past colonial relationships, with decision-making power concentrated in the Global North.

Structural racism is so deeply embedded in the everyday culture and working practice of those in the sector that it has affected the way local staff regard their own communities and how they engage with INGOs.

Some of the language used in the aid system reinforces discriminatory and racist perceptions of non-White populations. The phrase 'Capacity building' was cited as one example that suggests that local communities and organisations lack skills, while other terms, such as 'field expert' perpetuate images of the Global South as 'uncivilised.'

Many global north aid sector practitioners perceive themselves (and the wider sector) as operating neutrally, which is not only a fiction, it also reinforces the 'white saviour' and 'white gaze' mentality that has its roots in colonialism.

Structural racism benefits organisations in the Global North and also those from the Global South who know how to 'play' the system. The most widespread example cited in the consultation was funding opportunities for programmes and research which benefit a relatively small number of 'usual suspects' i.e. INGOs with pre-existing relationships with donors.

One of the most obvious manifestations of structural racism in the sector is the parallel system for employing staff in the Global South, not only in terms of salaries and benefits offered to Global South staff compared to the Global North counterparts, but also in how skills and experience are devalued in practitioners from the Global South.

Programme and research design are rooted in Western values and knowledge systems meaning that many programmes inadvertently create a standard based on the West that communities in the Global South are required to meet. Local knowledge is, by default, devalued.

The challenges faced by individual practitioners of colour are amplified if they belong to other marginalised groups, including women, the LGBTQ* community, the disabled community, the non-Anglophone community, etc. Attempts to bridge the global/local divide often focuses on a particular identity group failing to incorporate an intersectional approach."

The report highlights critiques of and problems relating to racism in communications and fundraising, arguing that the portrayal of "people in the Global South as helpless and without agency, to generate sympathy and funding, and to reinforce the notion of the white saviour or 'professional' INGO" is one the main ways that structural racism shows up in the sector (2021: 33). For the authors, "one of the examples of inequality between the Global North and Global South is how images of Black, Brown and Indigenous people are used by communications and fundraising teams. Nikki van der Gaag, a gender and development consultant, points to conversations that took place in 1987 as part of an international research project on the need to rethink the images selected to encourage donations. African consultants shared how the infamous images of hungry children and Black people lining up for food not only divorced photographs' subjects from the wider environmental, social and historical realities that led to the 1983–1985 famine in Ethiopia, but presented Africans as passively incapable of addressing their own challenges. This image of Africa as a land of endless struggle, dependent on the West to save it, exists in the shared imagination of the aid system and is rooted in the 'White gaze'. In financially supporting the organisations using such images, passive Western consumers are positioned as 'saviours' of Black and Brown bodies. Those organisations tend to be located in the West and run by people with no personal connection to those photographed. The harm such images inflict cannot be overstated: they dehumanise and exotify Black, Brown and Indigenous people in crisis-affected regions; reinforce the sense of the White Westerner as saviour of the less capable non-White population; and have, at times, impacted non-White, non-Western populations' sense of capacity" (2021: 27).

A critical example of the effect of power relations in the aid industry is discussed in the report with reference to sexual abuse of women within the sector. They argue that in light of research, e.g., by the Humanitarian Women's network, and the high profile scandals in the sector, that aid organisations and donors have been prompted to "dismiss staff for inappropriate behaviour, update codes of conduct and safeguarding principles, and generally overhaul their organisational culture. Yet, these measures fail to address the deep-rooted structural imbalances underpinning the issue" (2021: 29). Explaining the cultural, organisational and broader institutional politics of sexual violence, the report provides important insights for understanding ethical communications. Though important in its own right, for our purposes, it might be instructive to imagine the term 'ethical communications' in place of the term 'sexual violence' in the following points:

"sexual violence cannot be separated from the wider context of power structures embedded in the international aid system and the history of colonial violence. The intersections between gender, race and identity play a major role in how sexual abuse takes place in the aid sector. According to NGO Safe Space – an intersectional feminist platform created to hold sexual abusers to account

and support survivors – the aid sector harbours a 'white saviour complex' that fails to acknowledge its entrenched privilege and the harm it inflicts on vulnerable groups, notably women of colour. Zimbabwean feminist activist Nancy Kachingwe further claims that racialised perceptions of sexual violence have enabled a culture of impunity in the aid sector: 'By posing sexual violence and abuse in the South as a problem of the racialised other, and by contrast, presenting NGOs as white saviours, the sector has allowed itself to drift down a treacherously slow river of denial and obfuscation about its own sexual abuse problem until it has hit the fierce rapids of reality.' This reinforces the harmful colonial narrative that relegates issues of sexual and gender-based violence to the 'uncivilised' Global South. Such narratives harm non-White communities, especially African/ Black men, who have historically been positioned as inherently dangerous and sexually aggressive. They also harm White communities, as by insisting such problems are limited to the Global South, instances of sexual and gender-based violence in the Global North are overlooked, minimised or normalised. According to Kachingwe, responding to these issues requires more than procedural measures around safeguarding and gender sensitivity. Indeed, despite some key advances in safeguarding, sexual abuse and exploitation remain widespread across the aid sector. What should be emphasised instead is stronger inclusion of women – particularly from the Global South – in decision-making, prioritising and supporting women's leadership across the sector, and providing funds directly to women-led groups" (2021: 29).

The report concludes as follows (quote: p.37):

"Decolonising norms, institutions and systems that have developed over decades will inevitably take time, requiring the dedicated efforts and collaboration of governments, international organisations and local civil society. However, as this report has explored, decolonising the aid system is a necessity if we are to shift global power dynamics and ensure the sustainability of development, humanitarian aid and peacebuilding projects.

Those who constitute local civil society are currently being overlooked, and their context-specific knowledge, innovativeness and strong local networks are not mobilised to their potential. The aid system can no longer afford to overlook, minimise and under-value local knowledge and leadership. Moreover, it can no longer afford to perpetuate the 'White gaze', which privileges practitioners from the Global North – particularly White practitioners – to the detriment of local actors and the wider community.

To truly decolonise aid, development and peacebuilding, a multi-pronged process is needed. International organisations, governments and funders must address the prejudices and stereotypes that may be impacting their willingness to trust in local (non-White) practitioners. They should also consider the value of indigenous knowledge, incorporating alternative ways of thought into their reporting and evaluating. Furthermore, they need to assess their policies, organisational culture and relationships with local practitioners in order to identify whether existing norms promote extractive relationships over serving the needs of local communities.

Participants suggested a variety of strategies and new approaches that could address some of these challenges and, in time, ensure the inclusion of marginalised communities. It is not enough to localise projects; if non-White, non-Western individuals do not hold structural power, the system will simply continue replicating itself, skewing global power dynamics ever more in favour of the Global North. Beyond tokenistic hiring or performative programmes, decolonisation requires existing norms be fundamentally disrupted and dismantled. It requires a commitment to the redistribution of power and resources."

On the basis of these conclusions, the report makes the following recommendations for INGOs, Donors and Policy makers (quoted p.6/7):

"Acknowledge that structural racism exists and acknowledge that there is a collective responsibility to tackle the problem". In explaining what this might involve, the report suggests that organisations should audit their assumptions and practices, "in the process assessing how structural racism may be showing up in their work (see diagram X). This could involve examining how ingrained racist, discriminatory or biased assumptions have impacted the donor or INGO's relationship with local organisations and people, especially if local actors hold multiple intersecting marginalised identities. An important first step would be to put a public statement on the organisation's website and in its communication materials acknowledging its power and position within the aid system, the biases that may have informed the organisation's past actions, and the systemic power dynamics that privilege certain people over others" (2021: 38).

Encourage conversations with grantees and communities about the power dynamics that influence the relationships between funder and grantee or INGO and local partner.

Create space for change, especially for those with marginalised identities, and expect and encourage those groups to question the current system and the power relations that underpin it.

Mind your language. End the use of outdated language such as 'beneficiaries' and involve communities in choosing new ways of describing terms that are no longer appropriate.

Encourage an internal organisational culture of openness to critique, and ensure that this is cognisant of gender, age and any other factors that might impact someone's willingness to critique. The report explains that this involves being "actively opposed to racist, discriminatory and prejudiced language and practices. This requires everyone to speak up when they witness incidents of racism and/or discrimination, rather than putting the responsibility on non-White, non-Western actors. This requires all organisations to establish safe spaces for internal critique, particularly for people of colour within White-dominated organisations. These safe spaces must be cognisant of gender, age and any other factors that might impact someone's willingness to critique. Moreover, leaders of organisations should acknowledge their own failings to encourage a culture of self-reflection and honesty" (2021: 39).

Fund courageously and trust generously.

Recruit differently, and in particular reassess the need for recruiting expatriate staff for any position based overseas. Commit to recruiting a greater diversity of staff in offices in the global North.

Invest in indigenous knowledge creation and value local knowledge

For INGOs specifically, the report recommends:

End the practice of 'White gaze' fundraising and audit your communications through a 'Diversity, Equity and Inclusion' lens.

Adopt a transition mindset for organisational strategies, which puts in place clear milestones for the transfer of power and resources to local organisations. Such a transition mindset should be enshrined in clear organisational strategies that measure success according to the extent to which an INGO is reducing, rather than expanding, its traditional organisational footprint, "for example,

the number of staff it employs, the level of income it attracts and the number of people and communities it directly serves). Direct implementation should be phased out in favour of a shift of resources to local organisations, and reserved only for exceptional situations at the request of local organisations. Country offices should have clear targets for supporting indigenous civil society organisations" (2021: 40).

Avoid localisation spin. Don't reframe 'localisation' to defend a particular organisational position or to justify the status quo.

Re-evaluate partnerships with local organisations so that they are more equitable, and mutually accountable, and support and strengthen local leadership and sustainability.

Though the report acknowledges that these recommendations are not new, their "hope is that in bringing them to the fore now, at a time when the system is in such flux, it will provide an opportunity for those in the system to seize this moment to shift power in ways that create more equitable partnerships, leading to better humanitarian, development and peacebuilding outcomes for all" (2021: 6). As evident in these multi-faceted points, there is much in this report of concern for ethical communications, in terms of the use of images, language and messages, the processes and organisational culture supporting them and the deep and radical change needed.