

COMMUNICATIONS POLICY

1. SCOPE

This policy applies to all paid staff, trustees, volunteers, freelancers, sessional workers, trainees, students, or anyone working on behalf of Art Refuge (hereafter referred to as "staff"), or coming into contact with service users (directly or indirectly), for Art Refuge activities.

The policy covers all forms of communication, including:

- Written, verbal, and visual communications
- Digital and print materials
- Website and social media content
- Media interactions

2. PURPOSE

The purpose of this policy is to outline Art Refuge's approach to internal and external communications to support the charity's mission, aims, and priorities.

3. DEFINITIONS

Internal communications

Internal communications refer to the messages and information shared within Art Refuge. This includes communication between staff, volunteers, freelancers, trustees, the CEO, project teams and partner organisations who help deliver our work.

These messages may be shared by email, messaging apps, meetings, phone calls or shared online documents. They help us coordinate our work, make decisions, share updates and raise concerns.

External communications

External communications are messages and information that Art Refuge sends to anyone outside the organisation. This includes calls, emails, newsletters, social media posts, website content, marketing materials, press releases, and anything shared through the media or by word of mouth.

External communications also encompass information provided to visitors, partner organisations, funders, supporters, community groups, and sponsors.

4. OUR COMMITMENT

Our legal responsibilities

All staff must comply with:

- Copyright, Designs and Patents Act 1988- Art Refuge will never use or adapt others' images or written content without appropriate permission or licence. We will acknowledge the source/author/resource citation wherever permission has been given to reproduce content.
- UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and Art Refuge's Data Protection policy- including obtaining written consent before using photographs, artworks or stories that identify service users, maintaining records of that consent, providing privacy information, and securing and retaining records appropriately.
- Fundraising Regulator's Code of Practice – covering accuracy, transparency and ethical fundraising communications.
- Charity Commission guidance – including responsible political activity (CC9), safeguarding, serious incident reporting and trustees' duties.

All communications must uphold Art Refuge's duty to act responsibly, protect vulnerable people and maintain public trust.

5. INTERNAL COMMUNICATIONS

- Internal communication must be timely, clear, respectful and aligned with Art Refuge's values.
- Staff will be kept informed of relevant developments through meetings, emails, internal messaging and shared documents.
- Confidentiality and data protection apply to all internal communication; personal data must only be shared on a need-to-know basis.
- Frontline staff must escalate safeguarding concerns, operational risks or reputational issues promptly via the defined internal channels.
- The CEO is responsible for maintaining clear internal communication systems with oversight from the Communications Trustee.
- Staff, volunteers and contractors share responsibility for ensuring consistent and accurate messaging internally and externally.

6. EXTERNAL COMMUNICATION PRINCIPLES

Art Refuge's tone of voice across all communications seeks to reflect its mission and values as an organisation: caring, compassionate, educational, specialist, creative, hopeful, and dedicated to mental health and wellbeing.

Our proposed framework is that all external communications should:

- support humanitarian issues relating to refugees, trafficked people, those seeking asylum and other displaced persons.
- raise awareness and advance the education of the public relating to refugees, trafficked people, those seeking asylum and other displaced persons.
- refrain from making negative comments about individuals or political parties.
- not provide support or funding to any political parties or candidates.
- Ensure any political activity is independent and balanced and linked to charitable purposes.
- refrain from using identifiable information about service users without consent, including when communicating using visual media.
- use art and creativity as a key medium of communication where appropriate.
- comply with all of Art Refuge's policies, (Anti-Racism, Safeguarding, Data Protection, and Equality and Diversity).

Art Refuge staff represent the views of the charity when they communicate via Art Refuge's official channels, emails and social media accounts (see 'Communication Channels' section below). While staff may express their personal views through their personal accounts, they should continue to uphold Art Refuge's communication principles, given the potential impact of their personal views in the public domain on Art Refuge's public image and reputation.

Staff posting via official channels represent the charity. Personal accounts must not imply official positions unless authorised.

7. DELEGATION OF DUTIES

CEO and Communications Trustee

It is the responsibility of the CEO, with the support of the Communications Trustee to:

- provide strategic direction concerning communications
- appoint appropriate staff to manage communications
- coordinate external communications campaigns
- represent Art Refuge in external communications campaigns
- monitor public engagement and public feedback via external communication channels
- report any risks and incidents to the Board.

Board of Trustees

It is the responsibility of the Board of Trustees to:

- review and approve policies and strategies relating to external communications
- Oversee and manage risks, incidents and compliance.

8. COMMUNICATION AIMS

The aims of Art Refuge's external communications are to:

- Foster positive understanding of Art Refuge's mission and work
- Raise awareness of the issues that form the foundations of Art Refuge's work
- Build support for Art Refuge's fundraising activities
- Protect the reputation of Art Refuge
- Recognise the significant financial contributions received from specific funds/donors where there is an expectation that the counterparty is identified (either by name or use of company logo) on our social media.

Art Refuge communicates with a range of constituents/publics, including but not limited to:

- Individuals who have experienced displacement (such as refugees, asylum seekers, trafficked people, and internally displaced persons), and those who care for and support these individuals
- Art-engaged individuals and communities
- Art therapy practitioners and advocates
- Donors and potential donors
- Partner and funding organisations
- Policymakers and the Government
- Local councils relevant to Art Refuge's areas of activity
- Local communities in which Art Refuge operates
- Local and national press
- Arts, humanitarian, and art therapy specialist press

9. COMMUNICATION CHANNELS AND SOCIAL MEDIA

Art Refuge uses a range of communication channels. These include social media platforms: Instagram, Facebook, Bluesky and LinkedIn. Art Refuge also communicates with the public through its website and email newsletters. Additional communication channels may be used in future following review and approval by the Board of Trustees.

The CEO manages posting, monitoring, and moderation of social media channels under the oversight of the Communication Trustee.

Content standards

- All communications should reflect Art Refuge's values and tone: caring, compassionate, creative, hopeful, and professional.
- All communications will reflect Art Refuge's Anti-Racism Statement, avoiding stereotypes, 'othering', and discriminatory or marginalising language.
- All content must follow the communication principles and legal responsibilities set out in Section 4.
- Posts must be accurate, respectful, inclusive, and accessible (e.g. use alt text for images, captions for videos).
- Any political, campaign, or fundraising communication must follow the approvals process and comply with the Charity Commission (CC9) guidance.
- All fundraising communications will comply with the Fundraising Regulator's Code of Practice (e.g. being accurate, clear, and not using shocking content merely to attract attention).
- All case studies or stories, images and creative material involving people with lived experience of displacement will be truthful and representative, and will be gathered and shared ethically, with informed consent, in ways that avoid re-traumatisation and prioritise dignity and agency;
- All social media posts should be moderated according to safeguarding and equality policies (e.g. flagging harmful or inappropriate content, protecting vulnerable individuals).
- Consent may be withdrawn at any time, and Art Refuge will remove or amend content promptly upon request.

Personal use of social media

- Staff and volunteers may use personal social media accounts freely, but must not present personal opinions as those of Art Refuge.
- Staff and volunteers must not use personal accounts to engage with media or political actors on behalf of Art Refuge unless explicitly authorised.
- If their profile identifies them as affiliated with Art Refuge, they should include '*views are my own*'.
- Personal posts must not breach confidentiality, safeguarding, or harm the charity's reputation.

10. TRAINING AND COMPLIANCE

- Anyone posting on behalf of Art Refuge must complete training on this policy, safeguarding, and data protection policy.
- Breaches of this section may result in withdrawal of access, termination of volunteer or contractor engagement, or other appropriate action.

11. CRISIS AND MEDIA ESCALATION

- All media enquiries must be forwarded immediately to the CEO.
- In a crisis (safeguarding, serious incident, reputational risk, misinformation, hostile press), the CEO is the primary spokesperson.
- The Communication Trustee supports crisis coordination.

- Trustees must be notified where reputational or safeguarding risk is significant.
- Serious Incidents will be reported to the Charity Commission as required.

12. MANAGING RISKS

In keeping with the charity's policies on risk management, safeguarding, data protection, and equality, diversity and inclusion, Art Refuge will:

- Monitor comments, messages and interactions on official channels.
- Ensure all external communication risks, including social media risks, are documented in the risk register and monitor these periodically in line with the risk management policy.
- Document all incidents and report these to the Board of Trustees.
- Rapidly address risks and incidents as they arise on a case-by-case basis.
- Review any significant public feedback regarding external communications during Board meetings.
- Maintain an internal communications strategy that is updated in response to risks, incidents and public feedback.
- Use strong passwords and two-factor authentication for all official accounts, restricted admin rights and a written data-processor agreement with third-party scheduling or analytics providers where used.
- Ensure all high-risk, sensitive, or campaign-related content must be approved by the CEO or the Communication Trustee before publication.
- Ensure staff involved in external communications and campaigns read and understand this policy, and receive adequate supervision and support.

Photography and Image Use

- No photographs or videos of participants or program activities may be taken or shared without prior informed consent.
- Group photographs in asylum accommodation or other precarious living environments must be subject to a risk assessment before being taken or shared.
- All images intended for publication must be checked to ensure they do not inadvertently identify or locate vulnerable individuals, for example, through visible documents, signage, or identifiable backgrounds.

13. MONITORING AND REVIEW

This policy is fully supported by the Board of Trustees and the CEO of Art Refuge. It will be disseminated to all staff. The policy and Risk Register will be monitored and reviewed annually. The policy will be updated as required to reflect legal, regulatory or organisational changes.

14. COMMUNICATION CONTACT INFORMATION

Communications Trustee: Anna Castleton Simmons <https://www.artslondon.com/contact-us>

Chief Executive Officer: Bobby Lloyd bobbylloyd@artrefuge.org.uk