**How to use this open information policy template: Replace text in yellow with your organisation’s details. The text in each section is suggested text only, so feel free to amend it to make it relevant to your own organisation.**

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**Organisation’s name Open Information Policy**

**Scope and responsibilities**

This policy sets out the information that **organisation’s name**  (Registered Charity no. insert Registered Charity or Companies’ House number) will make publically available, both through our website and on request. It also sets out information that is excluded from this policy[[1]](#footnote-1), and how to appeal decisions relating to some types of exclusions. It is informed by best practice within the UK international development sector and existing legislation in the UK, where organisation’s name is a registered charity. This includes:

* The Freedom of Information Act
* Charities Regulation Act 2008
* Data Protection Act
* UK Aid Transparency Guarantee (for funding from DFID)
* International Aid Transparency Initiative

Overall accountability for the implementation of this policy will lie with responsible person’s job title. Compliance with this policy is the responsibility of all staff within organisation’s name. Specific accountabilities are as follows

* Publishing of information, responding to information requests, complaints procedure: responsible person’s job title.
* Provision of information for publication and information in response to requests: responsible person’s job title.
* Review and update of this policy: responsible person’s job title
* This document was created: date.
* This policy was discussed by responsible persons on date and approved by the Board of Trustees on date.
* It is owned by: responsible person’s job title
* **It is due for review:** date

**How to make a request for information**

All of the information listed in this policy is or will be openly available on our website. To request information that isn’t listed, or to request a more accessible format, please use the contact information on our website at website address or the address below.

We aim to respond initially within timescale working days, and respond fully within timescale working days of receipt of your request.

Email: contact email address

Postal address:

contact postal address

If you would like to appeal any response where the information you have requested is subject to exclusions, please follow the complaints procedure in Appendix I. Please also note that some categories of exclusion are not open to appeal [delete if not applicable]. See page page number for more information.

**Organisation’s name commitment to transparency**

Transparency lies at the core of our accountability towards our staff, our members and our supporters. It refers to our openness and honesty in sharing information about our activities, our performance and learning as an organisation, our governance and decision making processes and our financial arrangements.

Transparency has both internal and external aspects. Organisation’s name’s trustees, management and staff need to be sure they will be informed in a timely way of important information that could affect their work. If external stakeholders are to have confidence in us, they need to be sure that Organisation’s name will share timely, relevant information to enable them to make informed decisions about Organisation’s name and our work.

We will make information available in order to increase our transparency to our key stakeholders and to enhance our own effectiveness in achieving our mission. We will model best practice to others, including our members and those we support to increase their own transparency. We will also support the collective effort among international development actors to improve coordination through provision of standardised information on our activities, for example through IATI [delete if not applicable].

This Open Information Policy sets out Organisation’s name’s approach to information sharing on the basis of a preference for openness unless there are valid reasons for withholding information (see the Exclusions section of this policy). By adopting this approach, we enable our stakeholders to assess how we have made decisions, how we have managed our finances, how effective our programmes have been and how we learn from the challenges we face.

**Who are we transparent towards?**

Organisation’s name’s key stakeholders in terms of transparency are our trustees, staff and volunteers, our member organisations and our supporters including donors and partners. We also consider a key stakeholder group to be the people and communities in the South who are engaged with the activities of our members and for whom our members’ effectiveness is crucial.

In addition, we also have a responsibility to ensure we communicate information that is in the public interest in relation to sources of funding that originate from public money and our registered charity status.

**What information is shared under this policy?**

The following is not a definitive list but indicates the status of the most common types of information that is shared by organisations within the development and charity sectors. Organisation’s name may also share information not included on this list via our website website address.

|  | **Type of Information** | **Currently available (write website page URL or ‘on request in boxes below’)** | **Available by** **Write future date of publication** | **Exclusion categories that may apply (see page 6)** |
| --- | --- | --- | --- | --- |
| **Organisation** | Mission, vision, values  |  |  | None |
|  | Memberships and affiliations |  |  | None |
|  | Open information policy |  |  | None |
|  | Contact details and complaint procedure  |  |  | None |
|  | Charity Commission number, link to CC webpage |  |  | None |
|  | Articles of association (or link to CC website as above) |  |  | None |
| **Membership (delete if not a network organisation)** | Member/Affiliate Charter |  |  | None |
|  | Names and contact details of member organisations |  |  | Privacy (details of individuals) |
|  | Membership criteria and standard fees |  |  | Ownership of data. (eg. Information about fees paid by each individual organisation). |
|  | Membership benefits |  |  | Ownership of data. (Information about benefits accessed by each individual organisation). |
| **Governance and structure** | Board of Trustees – people and roles in decision making process |  |  | Privacy (details of individuals) |
|  | Minutes of quarterly Board meetings |  |  | Confidentiality; status. |
|  | Annual General meeting processes, Standing Orders  |  |  | None |
|  | Staff - people and roles in decision making process |  |  | Privacy (details of individuals) |
|  | Salary levels of highest paid staff |  |  | Privacy (details of individuals) |
|  | Whistleblowing policy  |  |  | None |
|  | Equal Opportunities Policy |  |  | None |
|  | Safeguarding vulnerable people policy |  |  | None |
|  | Environmental impact policy |  |  | None |
| Finance and grants | Income and expenditure (annual accounts) |  |  | Details of funders, activities and amounts received which are subject to exclusion on the grounds of confidentiality.[[2]](#footnote-2)  |
|  | International Aid Transparency Initiative data |  |  | Data which falls under our IATI exclusion categories |
|  | Corruption and fraud policy  |  |  | None |
|  | Procurement policy |  |  | None |
|  | Fundraising policy |  |  | None |
| **Performance** | Strategy |  |  | None |
|  | Annual summary of progress against our charitable objectives and strategy. |  |  | Confidentiality; status. |
|  | Summary of annual objectives published at the start of each financial year. |  |  | Confidentiality; status. |
|  | Regular summary of progress against objectives.  |  |  | Confidentiality; status. |
|  | Names, roles and contact details of the main partners we work with. |  |  | None |
|  | Plans and results relating to those activities which are publically (grant) funded. |  |  | Confidentiality; status. |

**Data protection and privacy**

Organisation’s name is subject to data protection and privacy legislation, and therefore we are unable to disclose personal private data covered by this legislation without consent, unless we are obliged or permitted by law to do so.

**Freedom of Information**

As a charity, Organisation’s name is not a public body and therefore is not subject to the UK’s *Freedom of Information Act 2000.* However, Organisation’s name is committed to working to increase the openness and availability of the information listed in this policy.

**Progressive publication**

Organisation’s name is committed to supporting trustees, staff and volunteers to value transparency and open information and to ensuring that we have cost-efficient systems in place to make information available, including an improved website. However, this will take time. Therefore Organisation’s name will follow a path of progressive publication, publishing what we can now and committing to publishing additional information by September 2015.

**Circumstances under which we may be unable to provide information**

If you request information from us, we may not be able to provide you will all the information you require. If all or part of the information you have requested falls under one of the following categories, we will write and let you know the reason we will not share it. You will have the opportunity to appeal this decision through our complaints procedure for some categories (indicated). For information about the complaints procedure, please see Appendix I.

* **Ownership of the data:** you may ask us to disclose information about a member that is not our right to disclose. This is outside of the scope of this policy and we will ask you to contact the member organisation directly. This decision is not subject to appeal.
* **Privacy:** where disclosure would breach data protection legislation or an individuals’ right to privacy. For example, we will not share the personal details of our staff, volunteers or individual supporters. This decision is not subject to appeal.
* **Confidentiality:** the information is confidential on legal, business or contractual grounds. This decision is not subject to appeal. Where Organisation’s name has grants that fall within this exclusion category, we are committed to working with our funders to move towards allowing us to share information with our stakeholders.
* **Intellectual Property Rights:** The IPR for a piece of work belongs to someone else and we cannot give permission for its use. This decision is not subject to appeal.
* **Security:** the disclosure of information may present a risk to the safety and security of staff and operations, either for Organisation’s name or other organisations.
* **Cost:** the financial or time cost of disclosing the information would be unreasonably high. Organisation’s name is a small organisation and we need to balance our commitment to transparency with our delivery of results, especially where it involves public or member funds. Appeal via complaints procedure.
* **Status:** The information is in draft state for staff review only, is an internal communication or an internal administrative or management document. Appeal via complaints procedure.
* **Vexatious, offensive or unreasonable requests:** we may decline to correspond if a person deliberately behaves in an offensive or abusive manner, aims to obtain information by deceit (for example by using false contact details or other misrepresentation) or otherwise engages in unreasonable conduct. Appeal via complaints procedure.
* **Historical information:** if the information requested is historical, it may be difficult and costly for Organisation’s name to obtain archived material. Appeal via complaints procedure.

**Copyright and legal information about this policy**

This policy is for information only, and therefore is not a binding contract and does not confer legal rights on any person.Organisation’s name reserves intellectual property rights for information and materials provided under this policy, including those materials distributed under an open license.

**APPENDIX I**

Organisation’s name **Complaints Procedure**

**Right of complaint**

All Organisation’s name members, service users and the general public have the right of complaint in respect of Organisation’s name’s services and activities, members, some categories of exclusions within Organisation’s name’s open information policy or specific conditions of membership.

**Dealing with complaints**

***Add in details of your complaint procedure here and a link to a webpage about making a complaint, if you have one.***

1. There may be occasions when Bond may be subject to a legal requirement to disclose information currently covered by our exclusions, at which point the legal requirement will override this policy. [↑](#footnote-ref-1)
2. Bond is committed to working with our funders to encourage them to become more transparent. [↑](#footnote-ref-2)