

Policy on Excluding Sensitive Information from Publication

INTRODUCTION

All We Can has five strategic principles:

1. All We Can is an international development, relief and advocacy organisation. It has roots in the Methodist Church, and its vision, priorities and values are grounded in Christian principles
2. We work for sustainable long-term change to end the cycle of suffering caused by poverty, inequality and injustice
3. We work around the world with diverse types of Civil Society Organisations, including Methodist groups
4. We focus on local partnerships and longer term collaborative relationships in support of the poorest communities in some of the poorest countries
5. We are an active, courageous and prophetic voice calling for justice for the poor and vulnerable.

All We Can is committed to transparency in all of areas of its work. It shares information openly with its 31 current partner organisations, as well as the many individuals and over 2,500 churches that support its work.

It is also dedicated to publishing data in accordance with The International Aid Transparency Initiative (IATI) – a multi-stakeholder initiative to help implement the transparency commitments made at the Accra Agenda for Action, arising from the 2005 Paris Declaration on Aid Effectiveness. IATI aims to agree ‘standards for sharing information. This is so that aid information will be useful to all stakeholders, particularly those in developing countries. It will also make that information simpler and easier to understand, to compare and to use.’¹

EXCLUSION CRITERIA

‘An open information policy should be based on the assumption that all information should be disclosed unless the policy provides robust reasons for it to be withheld from publication.’² While All We Can adheres to full disclosure in publishing information, there are a small number of exclusions the organisation makes to protect its staff, partners and the value of its work.

¹ International Aid Transparency Initiative, ‘About IATI,’ <http://www.aidtransparency.net/about> (accessed 15 May 2012).

² Gunstensen, Hillman and Kamming, ‘Bond, Developing and Open Information Policy: Guidance for NGOs,’ February 2012, [http://support.iatistandard.org/attachments/token/8t5oqsnhvcclfbj/?name=Bond Guidance for NGOs - Developing an Open Information Policy.pdf](http://support.iatistandard.org/attachments/token/8t5oqsnhvcclfbj/?name=Bond+Guidance+for+NGOs+-+Developing+an+Open+Information+Policy.pdf) (accessed 16 May 2012).

Exclusions are based on key legislation from Parliament's 2000 Freedom of Information Act, of which full provisions came into force on 1 January 2005. The act gives private citizens the right to access, on request, information held by public authorities. Exclusions set forth herein, include Part II Exempt Information: 27) International Relations; 38) Health and Safety; 40) Personal Information; 43) Commercial Interests; and 44) Prohibitions on Disclosure.³

EXCLUSIONS

1. **International Relations** – Any information that may impact relations between All We Can and local, national or international government bodies in the UK or abroad.
 - a. Work All We Can performs in fragile states or countries in conflict where information disclosure could harm overseas partner organisations or working operations in that country
 - b. Information that is critical or otherwise expresses partisanship toward a government or political party
2. **Health and Safety** – Any information that could endanger the safety or physical or mental health of any member of All We Can's: staff, partners, beneficiaries or supporters
 - a. Unless otherwise authorised by partner organisations:
 - i. The names of specific persons, partner staff and beneficiaries that are involved in projects that are of a sensitive nature
 - ii. Addresses of partner organisations
 - iii. Exact geo-coordinates of work overseas
3. **Personal Information** - Any information that infringes on personal privacy, putting physical or mental wellbeing at risk
 - a. All data on All We Can and partner staff records, including: personal contact and family information, selection processes, medical histories and information related to any allegations of misconduct
 - b. Personal communications between staff and partner organisations or supporters
 - c. Individual partner staff salary information that may cause organisational conflict
 - d. Data and communications on funders and other supporters who request to remain anonymous
4. **Commercial Interests** – Any information that could infringe on All We Can's ability to achieve value for money or harm partners' commercial interests
 - a. Information regarding competitive bidding prices, contracts for labour or materials for projects
 - b. Information on consultancy fees and ad hoc or contracted staff salaries

³ UK Parliament, 'Freedom of Information Act,' <http://www.legislation.gov.uk/ukpga/2000/36/contents> (accessed 16 May 2012).

- c. Budget data that would inhibit All We Can from securing low cost services on future project bids

- 5. Prohibitions on Disclosure** – Any information that is prohibited from disclosure under another national or international policy or that would otherwise be punishable by court of law
- a. Information that goes against other All We Can organisational policies
 - b. Data that has firm restrictions placed on it by UK General Acts legislation or international treaties

EXCLUSION IMPLEMENTATION

If information falls into one of the categories above, three types of exclusion from publication can occur:

- 1. All information about a given project
- 2. A component of a project
- 3. A document related to a project

Staff responsible for managing exclusions must give valid reason for which portion(s) of a project are not published. Approval of exclusions will be carried out by senior staff to ensure disclosure is implemented in every possible circumstance. All senior staff will be held accountable for any exclusion made that affects the transparency of All We Can's operations. To maximise time efficiency and minimise the burden of information disclosure for staff - any pay/allowances under £1,000 will not be published, and project information from before 2007 will not be published.

The list of exclusions of any data will be maintained by the grants manager of all projects. For IATI, publication will take place quarterly. Senior staff will be asked to review exclusions annually to confirm the data that will continue to be excluded.

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