

INFORMATION DISCLOSURE POLICY

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Approved by:	International Board
Recommended by:	Director of Communications
Owner:	Director of Communications
Date of next review:	2009
Related policies and procedures:	None
Version:	1.0

SUMMARY

This policy covers the disclosure of Plan information and material to the public and other stakeholders. It outlines our policy and commitment to disclosure and those responsible for upholding that commitment.

1. Definitions.

1.1 For the purposes of this Policy, “Plan” will be defined as Plan International Inc.

1.2 This Policy defines ‘information’ as printed or electronic materials that provide information about Plan activities, including, but not limited to, the programmes and operations of Plan.

1.3 This Policy applies to the Programmes and activities administered by Plan in relation to those organisations, partners, communities and children associated with Plan.

1.4 The information disclosure policy should be read in conjunction with the following policy documents: the Information Security Policy, the Information Classification Guidelines and the Information Classification Policy.

2. Scope.

2.1 This Policy applies to information regarding the Programmes and activities administered by Plan. To the extent that much of Plan’s information is already publicly available through various means, including through the Plan International website and appropriate Regional, and Country Office websites, this Policy codifies existing principles, practices and procedures.

3. Responsibility

3.1 Compliance with this Policy is the responsibility of the respective Programme Unit Manager, Country Director, Regional Director, and Departmental Directors at International Headquarters (IH), Chief Operating Officer, Chief Executive Officer, International Board and the Plan Member's Assembly. Overall responsibility for adherence to this Policy lies with the Communications Director at Plan IH.

4. Policy

4.1 Plan's Information Disclosure Policy (hereinafter referred to as the "Policy") is intended to ensure that information concerning Plan programmes and operations is publicly available. Confidential or sensitive information is excluded.

4.2 This Policy is available on the Plan International website, as well as the relevant Regional, and Country Office websites.

5. Public access

5.1 Information is published on the Plan International website and appropriate Regional, and Country Office websites. Country specific documentation is available from the appropriate Regional and Country Office websites. Additional information is available from Plan publications.

5.2 If the information is not readily available, the public can contact the appropriate Community Programme Unit Manager, Country or Regional Director, or Communications Director at Plan International Headquarters directly or through the 'contact us' facility on www.plan-international.org, to enquire whether further information can be given.

6. Responding to Requests

6.1 The appropriate Community Programme Unit Manager, Country and Regional Director, and Director of Communications at Plan IH are responsible for ensuring that requests for information from interested parties are addressed.

6.2 A response to a request for information will be given within two working weeks of the request if possible.

6.3 If a request is denied a justification will be given.

7. Information available to the public

7.1 The following information is made available to the public:

7.1 (a) Country Programme Management: Country Strategic Plan, Country Programme Progress Reports, Mid Term Reviews, Programme Evaluations and other documentation.

7.1 (b) Plan Operations and Organisation: International Board minutes, Plan programme and organisational policies, annual financial statements, strategic directions, programme framework, global effectiveness report, thematic evaluation reports, and other documentation.

8. Languages

8.1 The above information is available in at least one of the three working languages of Plan (English, French and Spanish), depending on the official/working language of the Country Office publishing the information.

9. Confidentiality

9.1 Whilst Plan is committed to having an open and transparent disclosure system in place, there are legal, operational, child protection, and practical considerations that are necessary to preserve the organisation's interests, as well as those of its staff, sponsors, donors, its various partners, and particularly the children and communities it works with. The exceptions below in subparagraphs (a)-(g) are limited to what is necessary to preserve essential and legitimate public or private (e.g. personal privacy) needs. Information under the following categories is deemed confidential and not available to the public:

9.1 (a) Information received from or sent to third parties, under an expectation of confidentiality.

9.1 (b) Information whose disclosure is likely to endanger the safety or security of any individual, violate his or her rights, or invade his or her privacy;

9.1 (c) Information whose disclosure is likely to endanger the security of country states or prejudice the security or proper conduct of any operation or activity of Plan;

9.1 (d) Information covered by legal privilege or related to access to internal audit reports.

9.1 (e) Internal inter-office or intra-office documents, including e-mails and draft documents;

9.1 (f) Commercial information where disclosure would harm either the financial interests of Plan or those of other parties involved;

9.1 (g) Information that, if disclosed, in Plan's view, would seriously undermine the policy dialogue with Governments, sponsors, donors, communities, or implementing partners.

9.1 (h) Information that becomes confidential and sensitive as a result of changing circumstances.

10. Vexatious requests

10.1 Abusive, excessive or vexatious requests may be denied.

11. Request for information not in the public domain

11.1 If information is not available or a request denied then the person making the request may write to the Legal and Risk Management Office, making a case for reconsideration. Requests should be directed to: Plan Legal Counsel, Legal and Risk Management Office, Plan International, Chobham House, Christchurch Way, Woking, Surrey, GU21 6JG, UK. Email: informationrequest@Plan-international.org

11.2 Every request will be acknowledged. The person making the request is entitled to a response from the Legal and Risk Management Office within 14 calendar days of receipt of the request.



12. Procedure for appeal to the Chief Executive Officer:

12.1 In the event that the person making the request is not satisfied with the response from the Legal and Risk Management Office and a request for a document remains denied in whole or in part, the person making the request may ask for a review of this determination by the CEO whose decision will be final.

12.2 Every request for appeals will be acknowledged. The CEO shall review the denial of requests to disclose a document or portion of a document to a member of the public, and provide a final determination generally within 30 calendar days of receipt of the appeal but never later than 60 calendar days.