

Information Disclosure Policy

Document reference number: 210

Version number: 1.0
Authorization date: 18 November 2015

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1. Introduction

1. The International Federation of Red Cross and Red Crescent Societies (IFRC) is committed to a culture of transparency and openness.
2. The IFRC seeks to ensure stakeholder trust and confidence and an effective feedback mechanism in order to improve organizational impact.
3. IFRC considers access to information a key component to the effective participation in and understanding of the Red Cross and Red Crescent work.
4. Working accountably necessitates that IFRC' stakeholders have the information they require in a timely manner, while protecting institutional and/or individual interests as defined herein.
5. The IFRC works on the principle that information shall be disclosed unless there is a compelling reason for non-disclosure as set out herein.
6. Information is only useful if it is accessible and comprehensible. The IFRC therefore strives to provide relevant information in a clear, easily understandable manner in electronic and print format as far as possible.
7. The IFRC strives to ensure that relevant information is available in the four working languages of the IFRC, English, French, Spanish and Arabic.
8. In the rare circumstances where information is not disclosed publicly this Information Disclosure Policy (Policy) seeks to explain the reasons why and find means to enable stakeholders who require access to restricted information to do so.
9. This Policy will evolve with its practise, the IFRC welcomes comments and feedback on its content and its information disclosure practises at *informationdisclosure@ifrc.org*

2. Scope of policy

1. This Policy applies to all "Information" in the possession of the IFRC. "Information" for the purposes of this Policy is defined as any "produced content", whatever the medium, concerning a matter related to the policies, activities and decisions of the IFRC.

3. Accessibility of information

2. The IFRC routinely discloses a wide range of documents, through a variety of mediums including its external website, www.ifrc.org. In addition, Member National Societies have full access to all documents, tools, guidance and reports, set out on the IFRC's FedNet.

3. Included in the types of documentation which the IFRC makes publicly available are:

- Our mission, mandate, vision, principles and goals;
- Summary of our history;
- Basic information on our membership such as contact details, leadership and respective strategic plans;
- Legal and Statutory Documents including:

The Statutes and Rules of Procedure of the Movement, as well as the IFRC's Constitution, Rules of Procedures, Staff Rules, Financial Regulations and Rules for Travel Assistance; Decisions of the International Conference, Council of Delegates, General Assembly and Governing Board; IFRC membership rules, policies and guidelines; IFRC's management rules, policies and guidelines; and the nature of our legal status and our compliance obligations.

- Organizational strategies and plans;
- Organizational structure; organigrams; and descriptions of post vacancies;
- IFRC's policy statements and position papers; statements and speeches of IFRC's governance and senior staff members;
- Systemic or organizational wide reviews, including internal audit reports;
- Programmatic and Operational Information including:

Annual Reports; Global or Thematic Appeals; Emergency or Operational Appeals; Operational Reports and Updates; Disaster Relief Emergency Fund Reports; Reviews, Evaluations, Assessments (internal and external)

- Information on IFRC's partnerships with inter-governmental organizations, international organizations, non-governmental organizations, corporations, and foundations;
- Information on procurement and suppliers; and
- Financial information including:

The Way We Finance (i.e. explanatory brochure regarding the IFRC' sources and uses of financing); Plan and Budget; Consolidated Audited Financial Statements, Appeal/Programme Audited Financial Statements, Monthly Consolidated Financial Reports, Appeal/Programme Financial Reports, Donor Response Reports for Appeals/Programmes), and Statutory Contribution Quota Calculation and National Society Payment information.

4. Disclosure restrictions

4. There are circumstances in which the IFRC will need to restrict information. A non-exhaustive list of reasons includes:
 - If the disclosure of information could endanger the safety or security of any individual, violate his or her rights, or invade his or her privacy, including the exposing of witnesses and whistle-blowers to possible retaliation or other adverse consequence as a result of the public exposure of their cooperation, or their report of alleged wrongdoing;
 - If the disclosure could prejudice the security or proper conduct of any operation or activity of the IFRC, including any potential undermining of a policy discussing or negotiation with a member or external stakeholder;
 - If the disclosure of information contravenes or undermines any confidentiality obligations of the IFRC, including Personal Information and third party information;
 - Information covered by legal privilege or related to investigations or disciplinary proceedings;
 - Exposure of the IFRC to the material risk of legal action; and
 - Disclosure which could significantly hamper the IFRC's ability to carry out internal deliberative or oversight functions.
5. If only a part of the information that is responsive to a particular disclosure request is subject to one of the limitations set out in this Policy, the IFRC may decide, at its discretion, that the remaining part of the information, responsive to that request, will be disclosed, and will take appropriate measures to preserve the confidentiality of the information that is not disclosed.
6. If the information requested contains information of a member National Society, the IFRC may share the information with the National Society concerned before disclosure and ensure that the National Society has the ability to redact or comment on the information prior to disclosure. Depending on the response of the National Society, the IFRC may be forced to redact the document itself or withhold its disclosure.
7. In light of the disclosure restrictions above, the IFRC will not render public investigation reports, nor other documents which, by their nature, are of restricted internal content. Upon the request however of a stakeholder, the IFRC may grant access to such documents in accordance with the following conditions:
 - A request must be submitted to the Director of Internal Audit and Investigations, including setting out the reasons motivating the request;
 - The request will be reviewed in light of the disclosure restrictions and decided upon by the Secretary General;

- If the request is granted, the IFRC will seek to make the document available to the requesting agency on a confidential basis. No copies nor distribution of the document will be authorized. The requestor may be asked to sign a non-disclosure agreement or undertaking of confidentiality; and
 - If the request is not granted, the IFRC will explain why and seek with the requesting party alternative means to ensure the necessary information as ascertained.
8. Decisions of the IFRC's Governing Board, and other IFRC's policies, procedures or practices, may contain other information disclosure limitations.

5. Processing of requests for public disclosure

9. Any person or organization may request the disclosure of IFRC's Information that is not otherwise available through IFRC's public website.
10. All disclosure requests must be submitted in writing (email or letter) and sent by email to: informationdisclosure@ifrc.org
11. The IFRC will not respond to requests that are submitted anonymously and reserves the right to deny abusive or excessive requests for information, and to make certain information available on a cost-recovery basis (e.g., for disclosure requests that involve the reproduction of material, IFRC may charge a fee for material and labour cost, which will be communicated to the requestor and will need to be paid in advance).
12. All disclosure requests will be handled promptly. The requestor should expect to receive an acknowledgement of receipt of the request within ten (10) working days. Depending on the complexity of the request, IFRC will endeavour to handle all requests within thirty (30) days after the acknowledgment of receipt is sent.
13. IFRC may partially or wholly deny a request, as follows:
- In accordance with the limitations set out or referred to in this Policy;
 - If the request is deemed by IFRC to be an excessive demand upon IFRC's resources; or
 - If the request, in the judgment of IFRC, appears to be frivolous.
14. The determination of the review will be communicated by the requester as soon as possible. In the rare cases of non-disclosure a justification will be provided.
15. In exceptional circumstances, the IFRC may require that certain Information be kept confidential by the requesting party. The requesting party may be asked to sign a non-disclosure agreement or undertaking of confidentiality.

6. IFRC Code of Conduct

16. This Policy is reinforced by our Codes of Conduct applicable to staff, as well as Governing Boards, and Committee and Commission members.

7. Privileges and immunities of the IFRC

17. Nothing in or relating to this Policy will be deemed a waiver, express or implied, of any of the privileges and immunities of the IFRC. Without limiting the generality of the previous sentence, the disclosure of Information Assets in response to a disclosure request will not constitute a waiver, express or implied, of any of the privileges and immunities of the IFRC:

8. Review of this Policy

18. This Policy is subject to regular review, at least every two (2) years or earlier if warranted.

9. For more information

19. Any questions concerns or requests you may have concerning this Policy please do not hesitate to contact: informationdisclosure@ifrc.org