



## **Information Disclosure Policy**

**July 2019**

3<sup>rd</sup> version, approved by Management on 5<sup>th</sup> July 2019

## 1. Introduction

Caritas Denmark is a transparent and responsible organisation concerning our decisions and activities. We are committed to upholding high professional and ethical standards of accountability in accordance with Caritas Internationalis Management Standards (CI MS) and Core Humanitarian Standards.

We comply with National laws and guidelines on information disclosure for Non-Governmental Organisations, and our information disclosure policy is published on our website. In terms of transparency and accountability, Caritas Denmark believes that information should be accessible and disclosed, subject to the limitations outlined in this policy. Subsequently, this policy applies to all information held by Caritas Denmark. It does not apply to information held by Caritas Denmark's individual partners, although our partners are encouraged to have similar policies that meet the legal requirements of their own country and the requirements of their stakeholders.

As Member Organisation of Caritas Internationalis, Caritas Denmark is committed to make available to the public information about our programmes and operations, and considers public access to information a key component of effective participation of all stakeholders and most of all our beneficiaries (CI MS, article 4.8). Both stakeholders and beneficiaries should thus be able to obtain relevant and reliable information on who we are; how and where we work; and our overall financial position.

Our Information Disclosure Policy therefore seeks to ensure that information concerning Caritas Denmark's structures, policies and activities is available to our stakeholders, and especially the people whom we support in our humanitarian, development and advocacy work. It is expected that such transparency will demonstrate that resources are being properly managed, used wisely and for the intended purpose.

Caritas Denmark's staff, volunteers and interns are fully informed about the organisation's vision, mission, activities and financial situation and kept up-to-date with necessary information in order to understand their responsibility and to be ethically respectful in their employment (CI Code of Ethics & Code of Conduct of Staff).

Principles and procedures in relation to Caritas Denmark's internal and external communications are addressed in our organisational handbook, which is considered restricted information as defined in Section 5 below.

## 2. Definition and Legal requirements

For purposes of this policy, 'information' means any content in paper, electronic or other medium, concerning a matter relating to Caritas Denmark.

Caritas Denmark is registered as an association in accordance with the Civil Law of Denmark and is therefore guided by Danish law in relation to public information disclosure. This policy is therefore subject to Danish data protection and privacy legislation. Accordingly, Caritas Denmark will not disclose data, information, or photographs about individuals where this is prohibited under applicable law, or where it is considered restricted information as defined in Section 5 below.

### **3. Public information**

Caritas Denmark aims continuously to ensure a high quality in public information and documentation, and we publish most information relevant to our work on our website - [www.caritas.dk](http://www.caritas.dk) - including the following:

#### **3.1 About Caritas Denmark**

The website provides an overview of who we are, what we do and where we work. Available on the site are the following documents and information:

- Caritas Denmark's statutes and by-laws which govern our work
- Caritas Denmark's values, vision and mission
- Presentation of Caritas Denmark's country programmes and international partners in our humanitarian, development and advocacy work
- Link to Caritas Denmark's publication of all our international projects in The International Aid Transparency Initiative (IATI)
- Annual report including a financial report on income and expenditure on operations of the secretariat

#### **3.2 Governance and management**

Caritas Denmark publishes the names of board members and parish representatives. Personal contact details will not be provided.

The names of all staff members at the secretariat are available publically as well as their individual email and direct phone number. Agendas and minutes of board meetings are not made public for reasons noted in Section 5 below.

#### **3.3 Organisational policies, principles and standards**

The Information Disclosure Policy has a direct correlation to many of the policies noted below that refer to further accountability commitments.

Caritas Denmark's organisational policies and principles are available publically on our website. They include:

- Ethical Code / Code of Conduct for the prevention of sexual exploitation and abuse, fraud and corruption and abuse of power
- Anti-Corruption Policy
- Complaints Policy
- HIV / AIDS Policy
- Au Pair Policy Paper
- Information Disclosure Policy
- Privacy Policy and Collection Ethical Guidelines
- Reference to the Danish Data Protection Agency's guidelines for publication of photos
- Reference to all the international conventions, principles and standards that Caritas Denmark pledges compliance with

The above named documents are available in Danish and, for most part, English on [www.caritas.dk](http://www.caritas.dk).

### **3.4 Evaluations and learning studies**

All evaluations and learning studies conducted by consultants and other external parties in or after 2017 are published on our website and shared within the Caritas network through the intranet Baobab.

These publications are governed by the provisions in section 5, including cases where part of the content is assessed to potentially put involved parties at risk or harm the reputation of partner organisations, individuals or other stakeholders. Under such circumstances, sensitive information will be blacked out before public view.

Extracts of key lessons learnt, successes and failures reflected in evaluations and learning studies will be shared with donors through progress report.

### **3.5 Caritas Denmark and IATI**

Caritas Denmark is part of the International Aid Transparency Initiative (IATI), which is a voluntary international initiative to create transparency about the use of development funds and relief.

International and national donors, recipient states and civil society organisations worldwide publish quarterly in a single online database their budgets, direct consumption and transfers of funds.

Their planned and actual results are published annually. This allows the money to be monitored from donor to target audience, and insights into how the money is spent and what benefit it makes.

Caritas Denmark is the first Danish development and relief organisation to publish all international projects from 2017 into the IATI database.

## **4. Sharing information with communities**

All Caritas Denmark's partners are accountable to their own governance structures. Partners are also, when members of Caritas Internationalis (CI), responsible for meeting their obligations following this membership.

CI Member Organisations, when delegating implementation of activities to partner organisations and/or dioceses, will ensure through contractual arrangements that the CI Management Standards (CI MS) are applicable for the implementing partner. Caritas Denmark is thus obligated to ensure that our local and national partners have similar mechanisms for information sharing in place at the project and programme level:

- Implementing partners: The Organisation encourages diocesan Caritas organisations to observe these Management Standards (CI MS, article 1.8)
- Information Disclosure Policy: The Organisation makes information about its programs and operations available to the public in accordance with an information disclosure policy that aims at transparency (CI MS, article 4.8)

#### **4.1 Transparency and accountability**

The CI MS commit Member Organisations to ensure that partners and other stakeholders, including beneficiaries and communities, have access to timely, relevant and clear information about the organisation and its activities, as stated in the following articles in the CI MS:

- Accounting and reporting: The accounting policies used by the Organisation comply with national legislation and preferably the International Accounting Standards (IAS), are documented and accessible to staff and external stakeholders (CI MS, article 3.4)
- Transparency and Accountability: The Organisation has a clear and transparent methodology of communicating with people (CI MS, article 4.1)
- Communication: The Organisation applies a clear communication policy and protocol, outlining responsibilities for both internal and external communication with stakeholders in different situations (CI MS, article 4.2.1)
- Information sharing: The Organisation informs stakeholders in a transparent way about its work and performance (CI MS, article 4.6)

The “Good Enough Guide” in the CI Toolkit provides a checklist (Tool 2) that partner organisations are expected to abide to in the sharing of information to communities regarding the project they are benefitting from. This resource also provides a “need-to-know” checklist (Tool 1) for use by the implementing partners in ensuring that their staff are adequately informed to answer what additional information that the communities might request.

#### **4.2 Feedback and complaints**

The CI MS additionally promote access to information on procedures for communities, staff, beneficiaries and other stakeholders to give feedback or complain.

- The Organisation has a complaints handling mechanism as a formal, publicly communicated mechanism (CI MS, article 1.7)

For communities to give feedback or complain, it is key that they are aware of what they can expect from the staff of the implementing partner organisation as well as regarding deliverables from the project (as mentioned in 4.1 Transparency and accountability). For this reason, implementing partner organisations are expected to share with communities their organisational commitments expressed in their code of conduct and/or code of ethics. These must comprise commitments against sexual exploitation and abuse in line with the CI code of ethics.

### **4.3 Stakeholder involvement**

The CI MS commit the Member Organisations to involve communities and beneficiaries in all possible levels of planning, implementing, monitoring and evaluation processes.

#### **In terms of program management (CI MS, article 3):**

- Program design is undertaken with the active involvement of the communities served, is realistic and evidence based, and takes the vulnerabilities and capacities of different groups into account (CI MS, article 3.2.2)
- Projects are implemented with the active involvement of the communities served, using sound planning, monitoring of the results and accountability to stakeholders (CI MS, article 3.2.4)
- Project closure is timely, responsive and accountable to all stakeholders (CI MS, article 3.2.5)
- Programs address the different needs, opportunities and inequalities faced by men, women, boys, girls and persons with specific vulnerabilities, prioritises those most affected and maximise their participation in project activities (CI MS, article 3.2.7)

#### **In terms of stakeholder involvement (CI MS, article 4):**

- The Organisation ensures, through communication using effective channels and language, with specific attention for women and girls, that affected people and communities know their rights and entitlements, have access to information and are participating in every stage of the project cycle (CI MS, article 4.1.1)
- The Organisation actively promotes the engagement of grassroots communities in its work (CI MS, article 4.4.1)
- The Organisation engages with civil society organisations and other stakeholders to avoid duplication, leverage resources, develop and implement joint policy development and advocacy efforts, and maximize impact (CI MS, article 4.5.1)

## **5. Restricted information**

Not all information is public. There are legal, operational and practical considerations that are necessary to preserve Caritas Denmark's interests, as well as those of its partners. The information under the following categories is considered confidential and not available to the public.

- 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, e.g. during crisis or when living under suppression

- Information whose disclosure is likely to endanger (staff of) the organisation, or the security of Caritas Denmark's partners, or prejudice the security or proper conduct of any operation or activity of Caritas Denmark
- Intellectual property or other information provided to Caritas Denmark on condition of confidentiality
- Information covered by legal privilege or under negotiation, including disciplinary and investigative information or related to access to internal audit reports
- Advocacy, communication and fundraising strategies, which would be compromised if made public before they were implemented, or possibly put Caritas Denmark's competitiveness at risk

Information on Caritas Denmark's internal administration or operating systems is available upon request from the secretariat, subject to the limitations outlined above.

The board is ultimately responsible for making decisions on Caritas Denmark's open information boundaries. It is responsible for approving and ratifying any policy decisions in relation to this policy, and for supervising the implementation of this policy in cooperation with the Secretary General. The Secretary General is responsible for making decisions on specific information requests from the public in between board meetings.

### **5.1 Protection of Personal Data, including photos**

Caritas Denmark is subject to the European General Data Protection Regulation (GDPR) and in accordance with this, Caritas Denmark has published a Personal Data Safety Policy on our website.

Besides what is mentioned in our Personal Data Safety Policy, publication of photos in print or on the Internet is normally also considered processing of personal data. A photo with an identifiable person is considered information about this person. Caritas Denmark must therefore adhere to the GDPR when publishing photos in print or on the internet. It will depend on an individual assessment whether a photo legally can be published.

Situational pictures can usually be published without consent, depending on the nature of the photo and in which context it is published. It is crucial that the persons in the photo cannot reasonably feel exhibited, exploited or violated, and the age of the person in the photo should also be considered. Publishing of portraits, however, always need consent. Caritas Denmark refers to The Danish Data Protection Agency for further description and examples of situational pictures versus portraits.

In order to avoid misconduct, Caritas Denmark's staff are instructed always to ask for consent whenever the purpose of taking a photo is to publish it in print or through digital media. Caritas Denmark's staff are also instructed always to consult the local partners in terms of cultural or legislative requirements for consent and to follow whichever policy or procedure is more protective of the individual's rights.

## 6. Copyright and disclaimer

All information and material posted on [www.caritas.dk](http://www.caritas.dk) are subject to Caritas Denmark copyright.

Caritas Denmark takes no responsibility for the content or information contained on other linked websites, nor does it exert any editorial or other control over those other sites.

No representation is made, or warranty given, express or implied, as to the completeness or accuracy of information made available by Caritas Denmark. The requestor shall apply discretion when using the information made available by Caritas Denmark. Caritas Denmark will not be liable for any direct or indirect loss arising from the use of the information.

## 7. Information requests

If the information is not available on the Caritas Denmark website, [www.caritas.dk](http://www.caritas.dk), the public can contact the secretariat. Any inaccuracies or incorrect information in our public documents can also be reported to the secretariat. All media enquiries should be handled by the Secretary General.

Additionally, individual staff email and direct phone number can be found on [www.caritas.dk](http://www.caritas.dk), depending on the nature of the information required. Request for information can also be made via post or telephone at the following addresses:

### **Caritas Denmark**

Gammel Kongevej 15, 3. Floor  
DK-1610 Copenhagen V  
Denmark  
Phone: +45 3818 0000

All requests will be responded to within 30 days where possible, subject to the limitations outlined in article 5.