

Policy	Open Information
Owner	Neil Thorns or Christine Allen TBC
Version	V4 May 2022
Approved by	Executive Team
Audience	All CAFOD
Next Review Due	May 2025

### **Policy Statement**

This policy communicates CAFOD’s commitment to be transparent in our work and accountable to our stakeholders. In particular, to the people, communities and partners we work with, and our supporters.

Sharing information is fundamental to transparency and accountability. This Open Information Policy sets out:

- the information CAFOD makes available as a matter of routine and how to access it
- the categories and types of information that are excluded from disclosure and why
- how to appeal decisions we have made about non-disclosure of information

### **Legal compliance**

Our commitment to be transparent in our work and accountable to our stakeholders means we will disclose information unless there is a justified reason for withholding it.

This policy is subject to UK data protection and privacy legislation. Accordingly, we will respect individual’s rights concerning their personal data held by CAFOD under the applicable data protection laws (namely the Data Protection Act 2018, UK GDPR and Privacy and Electronic Communications Regulation). Please see the Information Assurance and Data Protection Policy for further information.

### **Risk statement**

CAFOD relies on the trust stakeholders have in us to deliver our mandate in a way that complies with our stated values and commitments. Proactive disclosure and transparency about our work (to the extent it is safe and meets compliance requirement to do so) strengthens trust between CAFOD and its stakeholders and is in accordance with our commitments on accountability. There is a risk that if we are not transparent in our work, we may weaken or lose trust and negatively impact our reputation. This would reduce our legitimacy to seek support in achieving our mission.

### **Scope**

This Policy covers the public disclosure of all appropriate information held and owned by CAFOD.

This policy observes the protection of personal information of supporters, employees, volunteers, partners, communities, and other individuals but please see the Information Assurance and Data Protection Policy for more detailed information.

This policy does not cover:

- The basis and grounds on which CAFOD processes personal data. Please refer to the Data Processing of Personal Information Policy.
- The retention of data. Please refer to the Data Retention Policy.
- Information pertaining exclusively to the activities of third parties, including our partners. That information remains the property of those third parties and subject to their own information policies.

### **Policy details**

Driven by our commitment to transparency and accountability we will:

- Proactively publish or otherwise make available as a matter of routine, information which is held and owned by us and falls within the classifications in Annex I.
- Explain the methods by which the specific information is made routinely available so that it can be easily identified and accessed.
- Review and update the information we make available in line with the policy update
- Make this policy available to the public.
- Publish any information as required by authorities.

Proactively published information: CAFOD will routinely publish all information listed in **Annex I**. The majority of information made available under this policy is published on or via our website at [www.cafod.org.uk](http://www.cafod.org.uk). More details can be found in **Annex I**.

Other available information: Requests for information that is available as a matter of routine but not proactively published, can be requested in writing or by telephone. Its provision will be considered in accordance with the exclusion categories as outlined below. You can request information in the following ways:

- Telephone our main switchboard on +44 (0)20 7733 7900
- Email [cafod@cafod.org.uk](mailto:cafod@cafod.org.uk)
- Send a letter to CAFOD, Romero House, 55 Westminster Bridge Road, London, SE1 7JB

CAFOD aims to respond within one month of the request for specific information. If requests are numerous or complex, this period may be extended.

Charges for information: We aim to make the maximum amount of information readily available at no cost. However, there may be exceptional occasions where charges do have to be made for costs incurred such as: photocopying/printing; postage and packaging. Any charges we do have to make will be justified, transparent and kept to a minimum.

Accessible versions of information: Information will be provided in the language in which it is held. Most information is published in the English language although select information is also available in other languages. The main barrier to producing information in other languages is the time and cost required for accurate translation. Where we are legally required to translate any information, we will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to where possible when providing information in accordance with this policy.

## Categories and types of information excluded from disclosure

Fulfilling requests for information is at the discretion of CAFOD staff. We may not be able to fulfil all requests for information. Our assessment of legitimate grounds for non-disclosure falls into 5 categories. If all or part of the information you have requested falls under one of the following categories, we will let you know the reason we are not able to share it. You will have the opportunity to appeal this decision.

Categories for non-disclosure	CAFOD will not disclose information where it:
Prevented by law	<ul style="list-style-type: none"> <li>• Would constitute a breach of Data Protection Laws and/or the Right to Privacy</li> <li>• Would breach privilege in legal proceedings (unless the privilege is waived by the party in question).</li> <li>• Would not respect Intellectual Property Rights/Copyright of work belonging to someone else.</li> </ul>
Breach of confidence	<ul style="list-style-type: none"> <li>• Would constitute a breach of confidence. For example, a breach of a confidentiality clause(s) in a contract.</li> </ul>
Safety & Security Risk	<ul style="list-style-type: none"> <li>• Could jeopardise the safety or security of our staff, volunteers, partner organisations or communities with whom we work.</li> </ul>
Operational Risk	<ul style="list-style-type: none"> <li>• Could result in CAFOD or partner organisation operations being banned, restricted, or suspended.</li> <li>• Could have a negative impact on the people and communicates with whom we work.</li> <li>• Could jeopardise action that CAFOD is planning to take and in turn affect operations.</li> <li>• Could seriously harm relations with a third party and in turn affect operations.</li> </ul>
Resourcing request is disproportionate to level of public interest	<ul style="list-style-type: none"> <li>• Would involve a level of time/cost disproportionate to the level of public interest. For example: Information in draft form; Information that is no longer readily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons.</li> <li>• Requests detailed information about international programmes beyond that already publicly available (e.g. via the <a href="#">International Accountability and Transparency Initiative</a> (IATI), <a href="#">Evaluations</a> or supporter communications) <i>and</i> would detract international programme staff from vital work with partners and communities.</li> </ul>

We may also decline to continue to correspond if a person behaves in an offensive or abusive manner, aims to obtain information by deceit (for example by using false contact details or other misrepresentation) or engages in unreasonable conduct such as: repeatedly asking for information; seeking information that has no discernible public benefit; aiming to disrupt CAFOD's work or harass its staff members.

## Appeals Procedure

Our appeals procedure means that people can ask for a decision not to disclose information to be reconsidered. We ask people to appeal non-disclosure decisions via our complaints policy, a copy of which can be found on our complaints and incident management system at [www.cafod.ethicspoint.com](http://www.cafod.ethicspoint.com). Alternatively, appeals can be made in the following way:

- Email [cafod@cafod.org.uk](mailto:cafod@cafod.org.uk)
- Send a letter to CAFOD, Romero House, 55 Westminster Bridge Road, London, SE1 7JB

You can also contact the Information Commissioner's Office at <https://ico.org.uk/>

**Policy dissemination**

This policy will be disseminated to all staff and available to the public on our website.

**Compliance with policy**

Overall accountability for the implementation of this policy will lie with CAFOD's Executive Team. Specific accountabilities are included in Annex I

**Trustees' responsibilities**

Trustees are ultimately responsible for reviewing and approving this policy.

## Annex I: Information routinely available

This is not a definitive list, and the list is reviewed in line with this policy.

Classification	Information Type	Responsible
Who we are and what we do	What we do	Head of Communications
	Where we work	
	CAFOD & Catholicism	
	How we work	
	Our history	
	Contact Us	
	Charity n° & company limited by guarantee n°	
	Legal Information	
	Privacy notice	Head of Supporter Relations
	Policy and research	Head of Public Policy
	Trustees	Head of Performance & Governance
What we spend and how we spend it	Annual Review Summary	Head of Performance & Governance
	Reports of the trustees and our financial statements	
	Report of Grants	
What our priorities are and how we are doing	Our Vision & Mission/Strategy (Our Common Home)	Head of Performance & Governance
	Programme & Projects: plans, finance & progress	Programme Quality Team
	Programme & Project Evaluations	
	Gender & Ethnicity Pay Gap Data	Director of PCC
	CHS Audit Summary Reports	Automatic via HQAI
	Position statements /open letters	Head of Communications
Policies and procedures	Modern slavery statement	Head of Performance & Governance
	Environment Policy	
	Gender Policy	
	Dignity, diversity, and equality policy	
	Complaints Policy	
	<u>Integrity Policies</u> : Code of Behaviour; Safeguarding, Complaints, Whistleblowing; Anti Bribery; Anti Money Laundering; Fraud & Loss' Conflict of Interest; Counter Terrorism; Data Protection	
	Other statutory requirements	
	Supporter Promise	Head of Supporter Relations
	Fundraising Promise	
Campaigns Information	Head of Campaigns	