

# Transparency Policy

This policy covers how Family for Every Child is transparent to target groups and other stakeholders. It outlines our policy and commitment to transparency and identifies those responsible for upholding that commitment.

## 1. Definitions

- 1.1. Transparency is defined as being honest and open in the communication and sharing of relevant information, in an appropriate form, with target groups and other stakeholders.
- 1.2. 'Information' is defined as printed or electronic materials that provide information about Family for Every Child activities, including, but not limited to, the programmes, activities, governance and operations of Family for Every Child.

## 2. Scope

- 2.1. This Policy applies to information regarding the programmes, activities, governance and operations administered by Family for Every Child. To the extent that much of Family for Every Child's information is already publicly available through various means, including through the Family for Every Child's website, this Policy codifies existing principles, practices and procedures.
- 2.2. Outside of specific Family for Every Child initiated and funded activities, this Policy does not relate to the independent operations of members of Family for Every Child<sup>1</sup>.
- 2.3. This Policy version is valid from 21 September 2013 until 21 September 2015 at which point it will be reviewed.
- 2.4. This Policy version can be reviewed before 21 September 2015 in accordance with procedures laid out in our Governance Manual.
- 2.5. This Policy should be read in conjunction with Family for Every Child's Complaints and Child Protection policies.

## 3. Responsibility

- 3.1. Overall responsibility for compliance to this Policy lies with the Family for Every Child Board.

## 4. Access

- 4.1. Information is published on the Family for Every Child website and actively made available during relevant activities.
- 4.2. If the information is not readily available, the public can contact the appropriate Secretariat staff member at Family for Every Child directly or through the 'contact' facility on [www.familyforeverychild.org](http://www.familyforeverychild.org), or by writing to Family for Every Child, 4 Bath Place, Rivington Street, London, EC2A 3DR.

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<sup>1</sup> It is relevant to note that the key parts of Family for Every Child's Membership Values and Standards require members to demonstrate transparency in their work.

## **5. Decisions on information to be shared**

- 5.1. The decisions on what information is shared was made by Family for Every Child Board members during the development of this policy. Information used to make these decisions was informed by member experience and sector good practice.
- 5.2. In response to specific requests for information, the decisions on what information to share is made by either the lead Secretariat staff member responsible for an activity or the Secretariat Director.

## **6. Information available to the public**

- 6.1. Subject to their existence, the following information is made available to the public via our website:
  - 6.1.1. Board minutes summary [confidential and sensitive information will be removed]
  - 6.1.2. Board members and how they can be contacted ('contact' facility on [www.familyforeverychild.org](http://www.familyforeverychild.org))
  - 6.1.3. Clear description of Organisations structure
  - 6.1.4. Annual financial statements,
  - 6.1.5. Annual report including performance against Transparency policy,
  - 6.1.6. Strategic plan evaluation reports,
  - 6.1.7. Family for Every Child organisational policies (including Governance, Financial, Child Protection, Transparency, Child Participation, Complaints, Visual Images)
  - 6.1.8. Most recent strategic plan,
  - 6.1.9. How to make an information request.
- 6.2. Information related to 6.1.8 – 6.1.10 will be made available in Spanish

## **7. Information actively made available to participants in Family for Every Child activities**

- 7.1. The following information is actively made available to participants in Family for Every Child activities in an accessible<sup>2</sup> way:
  - 7.1.1. A description of the activity,
  - 7.1.2. What the objectives are,
  - 7.1.3. How the objectives and activities were developed, including how participants have inputted to these,
  - 7.1.4. What it means for those being communicated with,
  - 7.1.5. The rights of those being communicated with in terms of what they can influence, and how they can withdraw, make a complaint,
  - 7.1.6. Where it is taking place,
  - 7.1.7. When it is taking place,
  - 7.1.8. What the assigned budget is (where relevant) and
  - 7.1.9. Who has responsibility for key aspects of the activity
  - 7.1.10. Codes of conduct of staff

## **8. Responding to Requests**

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<sup>2</sup> Accessible is seen in terms of language, terms used, methods of communication and ease of physical access.

- 8.1. The Business Support Manager in the Secretariat are responsible for ensuring that requests for information from interested parties are addressed in line with this policy.
- 8.2. A response to a request for information will be given within 14 working days of the request if possible.
- 8.3. If a request is denied a justification will be given and options for appeal explained (see 12).

## **9. Confidentiality and disclosure**

9.1. Whilst Family for Every Child is committed to having an open and transparent system in place, there are legal, operational, data protection, child protection, and practical considerations that are necessary to preserve the organisation's interests, as well as those of its staff, donors, its various partners, and particularly the children and communities it works with. The exceptions below in subparagraphs (9.1.1 – 9.1.8) 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:

- 9.1.1. Information received from or sent to third parties, under an expectation of confidentiality.
- 9.1.2. Information whose disclosure is likely to endanger the safety or security of any individual, violate is or her rights, or invade his or her privacy;
- 9.1.3. 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 Family for Every Child and its personnel;
- 9.1.4. Information covered by legal privilege or related to access to internal audit reports.
- 9.1.5. Internal intra-Support Unit/Secretariat or Support Unit/Secretariat – member documents, including e-mails and draft documents;
- 9.1.6. Commercial information where disclosure would harm either the financial interests of Family for Every Child or those of other parties involved;
- 9.1.7. Information that, if disclosed, in Family for Every Child's view, would seriously undermine the policy dialogue with Governments, donors, communities, or implementing partners.
- 9.1.8. Information that becomes confidential and sensitive as a result of changing circumstances.
- 9.1.9. Information whose disclosure would require what is viewed as a disproportionate demand in terms of time cost or a monetary cost compared to the request being made.

## **10. Vexatious requests**

- 10.1. Abusive, excessive or vexatious requests may be denied.

## **11. Request for information not made available in section 8**

- 11.1. If information request is denied then the person making the request may request that their request be reviewed by the Director Membership Support, making a case for reconsideration.

- 11.2. Every request will be acknowledged. The person making the request is entitled to a response from the Director Membership Support within 14 working days of receipt of the request.

## **12. Procedure for appeal:**

- 12.1. In the event that the person making the request is not satisfied with the response from the Director Membership Support 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 Chief Executive whose decision will be final.
- 12.2. Every request for appeals will be acknowledged. The Chief Executive 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.
- 12.3. The Chief Executive shall use their own judgement as to whether to involve members of the Family for Every Child Board in making the decision.
- 12.4. If the person making the request is not satisfied with the response from Chief Executive they are encouraged to make a complaint in line with the Complaints Policy or contact the appropriate regulatory body where Family for Every Child are registered.

## **13. Ensuring implementation of policy**

- 13.1. Family for Every Child are committed to ensuring adequate resources in terms of staff time, training and finance are made available for this policy to be effectively implemented.
- 13.2. The Family for Every Child Board are responsible for ensuring 13.1
- 13.3. Our strategic, annual and activity plans will include sections on procedures for managing complaints together with roles, responsibilities and budget allocations.
- 13.4. The Business Support Manager is responsible for overseeing 13.3 in line with agreement from the Board.

## **14. Monitoring of policy**

- 14.1. The following information will be monitored and reviewed each year with the aim to ensure effective working of the policy to enable Family for Every Child to be a transparent organisations:
  - 14.1.1. Number or requests received
  - 14.1.2. How the request was received (email, telephone, to which member of staff)
  - 14.1.3. Information requested
  - 14.1.4. Response
  - 14.1.5. Response time
  - 14.1.6. If relevant respondent's satisfaction
  - 14.1.7. Within Family for Every Child activities the main methods information has been actively made available and the evidence for how successful these methods were.
- 14.2. The staff responsible for Family for Every Child's Monitoring and Evaluation will submit an annual assessment of the above information to the Finance and Audit Committee.

14.3. The Board will then review performance against the Policy with Business Support Manager and make requests to the Family for Every Child Secretariat as to how adequate performance can be ensured.

[End]