



Plan International UK OPEN INFORMATION POLICY

25th July 2016

INTRODUCTION

Plan International UK is committed to the principle of transparency in our operations. We believe that making information on our work publicly available is an important part of enhancing our accountability both to the children and communities with and for whom we work, and to those who provide us with the funding and other resources required to fulfil our mission. We seek to make information available in order to enhance our own effectiveness in achieving our mission, to ensure consistency with our own programme activities aimed at enabling the children and communities we work with to hold others to account, and to support the collective effort among international development actors to improve coordination through provision of standardised information on our activities.

PURPOSE

Plan International UK's Open Information Policy (hereinafter referred to as the "Policy"), applies to information produced by Plan International UK. For information and documents produced by Plan International Inc., (International Headquarters, Regional Offices and Country Offices) that are not associated with grants provided by Plan International UK, please see the Plan International Information Disclosure Policy. Due to the pooled nature of sponsorship funds, detailed information on programme work funded with sponsorship funds raised from Plan International UK falls under the scope of the Plan International Information Disclosure Policy and is not covered the Plan International UK policy. (Summary information is available through the Plan International UK Annual Report and Accounts.)

IMPLEMENTATION

Responsibility

Accountability for the implementation of this policy will lie with the CEO. Compliance with this policy is the responsibility of all staff within Plan International UK. Specific responsibilities are as follows

- Publication of information on Plan International UK website: Head of Communications
- Provision of information for publication and provision of information in response to requests: relevant Head of Unit

Policy

The Policy is intended to ensure that information concerning Plan UK programmes and operations is publicly available. Confidential or sensitive information or information that cannot be disclosed by law is excluded.

This policy is available on the Plan International UK website.

External Transparency & Accountability Initiatives & Requirements

Plan International UK is committed to compliance with the following initiatives and contractual obligations relating to transparency and accountability:

- **UK Aid Transparency Guarantee:** as a recipient of funds from the UK Government's Department for International Development, Plan International UK will be required to make information on our DFID funded work publicly available. We will meet contractual obligations expressed in our 2012-2016 Programme Partnership Arrangement with DFID in this regard, and work with DFID and other partners to achieve the standards of the UK Aid Transparency Guarantee.
- **Core Humanitarian Standards (CHS):** Plan International adheres to the CHS. Plan International UK will complete the CHS Self-Assessment protocol by October 2016 and the third party validation by the end of 2017.
- **International Aid Transparency Initiative (IATI):** Plan International UK is committed to achieving the IATI Standard for transparency.

Information available to the Public

The following information will be made available to the public, subject to the exclusions set out below:

- (a) Plan International UK Operations and Organisation: Annual report and accounts, Governance structure and board members, organisational strategy.
- (b) Plan International UK-funded Programme Management (i.e. for every project directly funded by Plan International UK): project name, description, funding source, total budget, disbursement and expenditure, proposals, logical frameworks (where available), summary budgets, final report, evaluation, external audit (where available).

Exclusions

While seeking to maximise our transparency, there will be circumstances in which Plan International UK may choose not to disclose certain information, for example for security, privacy, or commercial sensitivity reasons, or because we believe the staff and financial resources required to produce the information outweigh any benefits of publication. We will seek to limit these exclusions. Reasons for exclusion will be:

- **Security:** we will not publish information on activities where there is a significant likelihood that such publication would place the security of staff, partners or communities we work with at risk. This might apply to some emergency situations, or to sensitive work on aspects of human rights that conflict with local or national government policies or legislation (e.g. re female genital mutilation or LGBT rights). In such circumstances we may decide not to publish some details of the work, e.g. partner name, or contact details.
- **Data Protection:** we will not publish any information that contravenes Plan International UK's Data Protection Policy and any relevant UK or European

legislation. This may include, but is not limited to, the names of individuals such as private donors unless they have given explicit consent to do so.

- **Child Protection:** we will not publish information that would expose children we work with to potential abuse or exploitation. This primarily relates to personal information (such as names and contact details) regarding sponsored children and other children we work with.
- **Commercial sensitivity:** we will not publish information that would harm either the financial interests of Plan or those of other parties involved. This may include but is not limited to detailed unit costs (e.g. individual salaries and payment rates), fundraising/ marketing plans and documents relating to projects which have not yet secured funding.
- **Confidentiality:** information received from or sent to third parties under an expectation of confidentiality.
- **Information covered by legal privilege or internal audit reports.**
- **Historical Documents:** this policy will apply only to information related to current and new activities from the time the policy was first approved.
- **Cost effectiveness:** as a charity, Plan seeks to utilise its staff time and resources for the greatest impact on children; if the costs of producing information significantly outweigh any possible benefits from the public production of that information, or if requests for information are considered dilatory, we may choose not to publish. This may include setting a minimum project value or other thresholds relating to strategic importance or positioning below which we will not produce and update information, and not sharing working drafts of documents and internal communications.

Plan International UK has produced internal guidance for staff to accompany this policy providing greater details on how to apply this policy and exclusions.

Progressive Publication

Plan International UK is committed to supporting all staff to value transparency and open information and ensuring that we have cost-efficient systems in place to make information available including our website .Plan International UK will regularly review the information we provide as well as the requests we receive for information, using learning to guide a process of continuous improvement.

Plan International UK will adhere to the principle of “publish what you can”, and will set itself stretch targets to progressively move towards full compliance with this policy. Plan International UK’s Implementation Plan for IATI will set out our timeframe and commitments in this regard.

Public Access

Information is published on the Plan International UK website. Additional information is available from Plan International UK publications. A link to information will also be made available through the IATI Registry and other international development portals.

If the information is not readily available, the public can enquire whether further information can be given by contacting us at open.information@plan-uk.org, or through the 'contact us' facility on <http://www.plan-uk.org/contact-us>.

Plan International UK will work with Plan International offices to ensure that information is made available in ways that are accessible to the children and communities in which we work and which enable them to hold us to account.

With support from Plan International UK's Youth Advisory Panel, we will seek to make key information available in youth-friendly formats.

We will support efforts to make Plan's information available in formats that are compatible and comparable with emerging international standards and formats, such as IATI, in order to enable more effective use of that information by others.

Responding to Requests

Procedures will be developed for handling requests for information and updated periodically.

The appropriate Heads of Unit within Plan International UK are responsible for ensuring that requests for information from interested parties relating to their areas of work are addressed.

A response to a request for information will be given usually within 10 working days of the request if reasonably possible (ie without disproportionate cost).

If a request is denied a justification will be given.

Procedure for Appeal to the Independent Ombudsperson

In the event that the person making a request for information is not satisfied with the response received, 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 Plan International UK's independent Ombudsperson.

Every appeal will be acknowledged. The independent Ombudsperson shall review the denial of requests to disclose a document or portion of a document to a member of the public, and produce a report and a recommendation to the CEO, usually within 28 calendar days of receipt of the appeal.

APPENDICES (Related guidelines/procedures, diagrams etc.)

The procedures and policies set out in this document should be read in conjunction with the following associated documents

- Plan International Information Disclosure Policy
- Plan International UK Data Protection Policy
- Plan International UK Child Protection Policy
- Plan International UK Complaints Procedure
- Internal procedures for handling requests for information about Plan International UK's activities under the Open Information Policy.