

Practical Action

OPEN INFORMATION POLICY

Version	v:0003.00
Date	August 2021
Scope	All Employees
Review date	January 2022

Policy Owner	Finance and Service Director	
Responsible Director	Chief Executive Officer	
Approval required from	Board of Trustees	
Queries:	Contact the Policy Owner	
Exceptions:	Contact the Responsible Director	

Open Information Policy

Description of Policy

This policy sets out the information that **Practical Action** (Registered Charity no. 247257) will make publicly available, both through our website and on request. It also sets out

information that is excluded from this policy¹, and how to appeal decisions relating to some types of exclusions. It is informed by best practice within the UK international development sector and existing legislation in the UK, where Practical Action is a registered charity. This includes:

- The Freedom of Information Act
- Charities Regulation Act 2008
- Data Protection Act 2018
- UK Aid Transparency Guarantee (for funding from FCDO (formerly DFID)
- International Aid Transparency Initiative

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Scope and responsibilities

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information that is excluded from this policy¹ and how to appeal decisions relating to some types of exclusions. It is informed by best practice within the UK international development sector and existing legislation in the UK, where Practical Action is a registered charity. This includes:

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Overall accountability for the implementation of this policy will lie with Chief Executive Officer. Compliance with this policy is the responsibility of all staff within Practical Action. Specific accountabilities are as follows

- Publishing of information, responding to information requests, complaints procedure: Marketing and Communications Director.
- Provision of information for publication and information in response to requests: Information Officer.
- Review and update of this policy: Chief Executive Officer

How to make a request for information

All of the information listed in this policy is or will be openly available on our website. To request information that isn't listed, or to request a more accessible format, please use the contact information on our website at <u>www.practicalaction.org</u> or the address below.

We aim to respond initially within 5 working days, and respond fully within 10 working days of receipt of your request.

Email: enquiries@practicalaction.org.uk

Postal address: The Robbins Building 25 Albert Street Rugby CV21 2SD

¹ There may be occasions when Practical Action may be subject to a legal requirement to disclose information currently covered by our exclusions, at which point the legal requirement will override this policy.

Practical Action's commitment to transparency

Transparency lies at the core of our accountability towards our staff, our members and our supporters. It refers to our openness and honesty in sharing information about our activities, our performance and learning as an organisation, our governance and decision-making processes and our financial arrangements.

Transparency has both internal and external aspects. Practical Action's trustees, management and staff need to be sure they will be informed in a timely way of important information that could affect their work. If external stakeholders are to have confidence in us, they need to be sure that Practical Action will share timely, relevant information to enable them to make informed decisions about Practical Action and our work.

We will make information available in order to increase our transparency to our key stakeholders and to enhance our own effectiveness in achieving our mission. We will model best practice to others; including our members and those we support to increase their own transparency. We will also support the collective effort among international development actors to improve coordination through provision of standardised information on our activities, for example through IATI.

This Open Information Policy sets out Practical Action's approach to information sharing on the basis of a preference for openness unless there are valid reasons for withholding information (see the Exclusions section of this policy). By adopting this approach, we enable our stakeholders to assess how we have made decisions, how we have managed our finances, how effective our programmes have been and how we learn from the challenges we face.

Who are we transparent towards?

Practical Action's key stakeholders in terms of transparency are our trustees, staff and volunteers, our member organisations and our supporters including donors and partners. We also consider a key stakeholder group to be the people and communities in the South who are engaged with the activities of our members and for whom our members' effectiveness is crucial.

In addition, we also have a responsibility to ensure we communicate information that is in the public interest in relation to sources of funding that originate from public money and our registered charity status.

What information is shared under this policy?

The following is not a definitive list but indicates the status of the most common types of information that is shared by organisations within the development and charity sectors. Practical Action may also share information not included on this list via our website <u>www.practicalaction.org</u>

	Type of Information	Currently available	Avail able by	Exclusion categories that may apply (see page 6)
Organisation	Mission, vision, values	https://practicalaction.o rg/our-aims/		None

	Memberships and affiliations	https://practicalaction.o rg/our-partners/	None
	Charity Commission number, link to CC webpage.	https://register-of- charities.charitycommissio n.gov.uk/charity- details/?regid=247257&su bid=0	None
Governance and structure	Board of Trustees – people and roles in decision making process	<u>https://practicalaction.o</u> <u>rg/our-people/#trustees</u>	Privacy (details of individuals)
	Minutes of quarterly Board meetings		Confidentiality; status
	Staff - people and roles in decision making process	Strategic Leadership Team: <u>https://practicalaction.o</u> <u>rg/our-people/#leaders</u>	Privacy (details of individuals)
Finance and grants	Income and Expenditure (annual accounts)	<u>https://practicalaction.</u> <u>org/finances/</u>	Details of funders, activities and amounts received which are subject to exclusion on the grounds of confidentiality
	International Aid Transparency Initiative data	<u>http://www.iatiregist</u> ry.o rg/publisher/pa	Data which falls under our IATI exclusion categories
Performance	Strategy	https://practicalaction. org/our-aims/	None
	Annual summary of progress against our charitable objectives and strategy.	https://practicalaction. org/annual-report/	Confidentiality;
	Regular summary of progress against objectives.	via Annual Report https://practicalaction. org/annual-report/	Confidentiality; status.
	Names, roles and contact details of the main partners we work with.	https://practicalaction. org/partner-with-us/	None

Data protection and privacy

Practical Action is subject to data protection and privacy legislation, and therefore we are unable to disclose personal private data covered by this legislation without consent, unless we are obliged or permitted by law to do so.

Freedom of Information

As a charity, Practical Action is not a public body and therefore is not subject to the UK's *Freedom of Information Act 2000*. However, Practical Action is committed to working to increase the openness and availability of the information listed in this policy.

Progressive publication

Practical Action is committed to supporting trustees, staff and volunteers to value transparency and open information and to ensuring that we have cost-efficient systems in place to make information available, including an improved website. However, this will take time. Therefore, Practical Action will follow a path of progressive publication, publishing what we can now and committing to publishing additional information in future.

Practical Action Exclusion Policy

Circumstances under which we may be unable to provide information

This policy sets out where there may be restrictions and constraints that we need to adhere to and therefore it may not be possible to publish full details. If you request information from us, we may not be able to provide you will all the information you require. If all or part of the information you have requested falls under one of the following categories, we will write and let you know the reason we will not share it.

Record Exclusions

Security: For security reasons, transaction level reporting will be excluded to avoid personably identifiable data that may put staff, partners, communities or offices at risk.

Privacy: where disclosure would breach data protection legislation or an individuals' right to privacy. For example, we will not share the personal details of our staff, volunteers or individual supporters. This decision is not subject to appeal.

Project level: Project level documentation will not be published as Practical Action does not wish to disclose any information that may be confidential due to legal or contractual reasons or any information that may harm Practical Action Operations either in the UK or overseas.

Ownership of the data: you may ask us to disclose information about a member that is not our right to disclose. This is outside of the scope of this policy and we will ask you to contact the member organisation directly. This decision is not subject to appeal.

Confidentiality: the information is confidential on legal, business or contractual grounds. This decision is not subject to appeal. Where Practical Action has grants that fall within this exclusion category, we are committed to working with our funders to move towards allowing us to share information with our stakeholders.

Practical Action- Open Information Policy

Intellectual Property Rights: The IPR for a piece of work belongs to someone else and we cannot give permission for its use. This decision is not subject to appeal.

Security: the disclosure of information may present a risk to the safety and security of staff and operations, either for Practical Action or other organisations.

Cost: the financial or time cost of disclosing the information would be unreasonably high. Practical Action is a small organisation and we need to balance our commitment to transparency with our delivery of results, especially where it involves public or member funds.

Status: The information is in draft state for staff review only, is an internal communication or an internal administrative or management document.

Vexatious, offensive or unreasonable requests: we may decline to correspond if a person deliberately behaves in an offensive or abusive manner, aims to obtain information by deceit (for example by using false contact details or other misrepresentation) or otherwise engages in unreasonable conduct.

Historical information: if the information requested is historical, it may be difficult and costly for Practical Action to obtain archived material.

Copyright and legal information about this policy

This policy is for information only, and therefore is not a binding contract and does not confer legal rights on any person. Practical Action reserves intellectual property rights for information and materials provided under this policy, including those materials distributed under an open license.