

Transparency Policy

Family for Every Child is committed to being transparent in our work and accountable to our target groups and key stakeholders. We share information with partner organisations and the general public, and we are accountable to our members, staff, supporters, donors, and suppliers. This policy sets out our approach to accountability for the information we publish, identifies how we respond to requests for information and details who is responsible for upholding our commitment to transparency.

Scope

This Policy applies to information regarding the activities, governance and operations of Family. To the extent that much of Family's information is already publicly available through various means, including through our website, this policy codifies existing principles, practices and procedures.

Outside of specific Family initiated and funded activities, this policy does not relate to the independent operations of Family member organisations¹.

This Policy should be read in conjunction with Family's Complaints and Child Safeguarding policies.

Definitions

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.

Information is defined as printed or electronic materials that provide information about Family activities, including, but not limited to, the activities, governance and operations of Family.

Responsibility

Overall responsibility for compliance with this policy lies with the Board.

Access

Information is published on the Family websites and actively made available during relevant activities.

If the information is not readily available, the public can contact the Secretariat by emailing info@familyforeverychild.org or by writing to 23 Austin Friars, London, EC2N 2QP

¹ The Members' Charter requires members to demonstrate transparency in their work.

Decisions on information to be shared

The decisions on what information is shared was made by the Board during the development of this policy in October 2013. Information used to make these decisions was informed by member experience and sector good practice.

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 CEO.

Information available to the public

Subject to their existence, the following information is made available to the public on our website:

- Names of Board members
- Clear description of Family's governance structure
- Annual financial statements,
- Annual reports
- Relevant organisational policies such as Child Safeguarding, Transparency and Privacy Policy
- Most recent Strategy

Information actively made available to participants in Family activities

The following information is actively made available to participants in Family activities in an accessible way:

- A description of the activity
- What the objectives are
- How the objectives and activities were developed, including how participants have inputted to these
- What it means for those being communicated with,
- The rights of those being communicated with in terms of what they can influence, and how they can withdraw, make a complaint
- Where it is taking place
- When it is taking place
- What the assigned budget is (where relevant)
- Who has responsibility for key aspects of the activity
- Codes of conduct of staff

Responding to requests for information

The Head of Alliance Support and Governance is responsible for ensuring that requests for information from interested parties are addressed in line with this policy.

A response to a request for information will be given within 14 working days of the request if possible. If a request is denied, a justification will be given and process of appeal explained.

Confidentiality and disclosure

Whilst Family is committed to having an open and transparent system in place, there are legal, operational, data protection, child safeguarding, and practical considerations that are necessary to preserve Family's interests, as well as those of its staff, supporters and donors, its members and partners, and particularly the children and communities our members work with. The exceptions below 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:

- Information received from or sent to third parties under an expectation of confidentiality
- 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
- 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 and its members or staff

- Information covered by legal privilege or related to access to internal audit reports
- Internal Secretariat or Secretariat to member documents, including e-mails and draft documents
- Commercial information where disclosure would harm either the financial interests of Family or those of other parties involved
- Information that, if disclosed, in Family's view, would seriously undermine the policy dialogue with governments, donors, communities, or implementing partners
- Information that becomes confidential and sensitive as a result of changing circumstances
- 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.

Vexatious requests

Abusive, excessive or vexatious requests may be denied.

Request for information not made available

If information request is denied, the person making the request may request that their request be reviewed by the Head of Alliance Support and Governance, making a case for reconsideration.

Procedure for appeal

If the person making the request is not satisfied with the response and a request for information remains denied in whole or in part, the person making the request may ask for a review of this determination by the CEO, whose decision will be final.

Every request for appeals will be acknowledged. The CEO shall review the denial of requests to disclose information 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.

The CEO shall use their own judgement as to whether to involve members of the Family Board in making the decision.

If the person making the request is not satisfied with the response from the CEO, they are encouraged to make a complaint in line with the Complaints Policy or to contact the Charity Commission.

Ensuring implementation of the policy

Family are committed to ensuring adequate resources in terms of staff time, training and finance are made available for this policy to be effectively implemented. The Board are responsible for ensuring this.

Our strategic, annual and activity plans will include sections on procedures for managing complaints together with roles, responsibilities and budget allocations.

The Head of Alliance Support and Governance is responsible for overseeing the above in line with agreement from the Board.

Monitoring of the policy

The following information will be monitored and reviewed each year:

1. Number of requests received
2. How the request was received (email, telephone, to which member of staff)
3. Information requested
4. Response
5. Response time
6. If relevant, satisfaction of respondent
7. Within Family activities the main methods information has been actively made available and the evidence for how successful these methods were.

The Head of Alliance Support & Governance will submit an annual assessment of the above information to the Finance and HR Committee.

The Board will review performance against the policy and make requests to the Secretariat as to how adequate performance can be ensured.