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**www**.actalliance.org

**ACT Alliance**

**Public Information Disclosure Policy**

**May 2012**

*Approved by the ACT Governing Board on 3rd May 2012 –final version in compliance with Swiss law
and board comments*

1. **Introduction**

ACT Alliance is committed to being transparent in its work and in upholding the highest professional, ethical and moral standards of accountability[[1]](#footnote-1). A key dimension is addressing the legitimate information needs of its stakeholders, especially the people with whom ACT works, its donors, and the general public. ACT is equally accountable to its members, staff and supporters.

As a general principle, ACT believes that information should be accessible and disclosed, subject to the limitations outlined in this policy.

To build trust and confidence between ACT and its stakeholders, ACT believes interested stakeholders should be able to openly obtain relevant and reliable information on who we are; what we do; where our money goes; who and what holds us to account; and, our overall financial position and performance.

As an alliance of independent members, ACT encourages its members to increase the amount of quality information available to their stakeholders and especially to the people with whom they support in their humanitarian, development and advocacy work.

1. **Definition**

For purposes of this policy, ‘information’ means any content in paper, electronic or other medium, concerning a matter relating to ACT Alliance.

1. **Legal requirements**

ACT Alliance is registered as an association in accordance with the Civil Code of Switzerland and is therefore guided by Swiss law in relation to public information disclosure. This policy is therefore subject to Swiss data protection and privacy legislation. Accordingly ACT will not disclose data, information, or photographs about individuals where this is prohibited under applicable law or where it is considered restricted information as defined in Section 8 below.

1. **Purpose**

The ACT Public Information Disclosure Policy seeks to ensure that information concerning ACT’s structures, policies and activities is available to its stakeholders. It is expected that such transparency will demonstrate that resources are being properly managed, used wisely and for the intended purpose. This policy reflects ACT’s commitment to provide an opportunity for the recipients or consumers of ACT information to hold ACT accountable.

1. **Scope**

This policy applies to all information held by the ACT Alliance secretariat in Geneva, Switzerland. The policy does not apply to information held by individual ACT members. ACT members are encouraged to have similar policies that meet the legal requirements of their own country or region and their stakeholders.

Principles and procedures in relation to ACT internal and external communications are addressed in a separate ACT Communications Policy.

1. **Open information**

ACT seeks at all times to ensure high quality information and documentation for public consumption. ACT Alliance publishes most information relevant to the work of the alliance openly on its public website - [www.actalliance.org](http://www.actalliance.org) - including the following:

* 1. **About the ACT Alliance**

The website provides an overview of: who we are, what we do and where we work. Each member has a profile of their work and a link to the member’s website. Available on the site are the following documents:

* ACT statutes and by-laws which govern the work of ACT Alliance
* ACT Alliance “Founding Document”, February 2009, which outlines ACT’s vision, mission, objectives and member commitments.
* information regarding ACT membership criteria, application for membership, and member disciplinary policy
* membership agreement which outlines the roles and responsibilities of the ACT Alliance member and the ACT Alliance
* Quality and Accountability Framework (QAF) which summarises standards of quality towards which ACT can be held to account by its stakeholders and by each other.
* four year strategic plan which outlines ACT’s longer term plan for strengthening quality, accountability and impact of the work undertaken by ACT members, both individually and collectively.
* annual report of ACT Alliance development, humanitarian and advocacy work which includes a financial report on income and expenditure on operations of the ACT secretariat.
	1. **Governance and management**

ACT publishes the names, country and regional representation of the leadership and members of the three ACT governance structures: the governing board; executive committee; and, the membership and nominations committee. This information is also available in the ACT annual report. Personal contact details will not be provided.

The names of all staff at the ACT secretariat are available publically as well as their individual email contacts. Agendas and minutes of governance structure meetings are not made public for reasons noted in Section 8 below.

* 1. **Organisational policies, strategies and plans**

The Public Information Disclosure Policy should not be read in isolation from other ACT policies. It has a direct correlation to many of the policies noted below that refer to further ACT accountability commitments.

All ACT organisational policies, strategies and strategic plans are available publically on the ACT website. They include:

* Code of Good Practice
* Code of Conduct for the prevention of sexual exploitation and abuse, fraud and corruption and abuse of power
* Procedure for funding the ACT Alliance
* ACT emergency response mechanism policy, guidelines and tools
* National and regional forums policy and guidelines
* Advocacy policy
* Co-branding policy
* Anti- fraud and corruption
* Complaints policy
* Public information disclosure policy
* Communications policy

The above named documents are available in English, French and Spanish on the public website. Other documents include international standards adopted by ACT governance; policy guidance on sectoral and cross cutting issues (including: gender equality, climate change, disaster risk reduction, protection, psychosocial support, security, human rights, development effectiveness, impact assessment); policy briefs on thematic issues; achievements in ACT’s humanitarian, development and advocacy work; publications; research; media releases, and campaign actions.

* 1. **ACT emergency appeals**

The ACT website publically hosts open ACT emergency appeals and related documents, including a summary of the budget. In exceptional cases, some appeals are not made public for reasons noted in Section 8 below.

1. **Sharing information with communities**

All ACT members are accountable to their own governance structures. They are also responsible for meeting their obligations of membership of the ACT Alliance. The ACT membership agreement and the ACT Code of Good Practice commits ACT members to ensure that ACT stakeholders have access to timely, relevant and clear information about the organisation and its activities. They additionally promote access to information about project budgets, funding sources, how communities can give feedback or complain, and how they can participate in the development and humanitarian work of ACT members.

ACT members are encouraged to make this information available in languages and media accessible to the people with whom they work.

Members are further encouraged to ensure their local and national partners have similar mechanisms for information sharing in place at the project and programme level.

1. **Restricted information**

Not all information is public. There are legal, operational and practical considerations that are necessary to preserve ACT interests, as well as those of its members and their partners. The information under the following categories is deemed confidential and not available to the public.

* 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 ACT member organisations or their partners or prejudice the security or proper conduct of any operation or activity of ACT Alliance
* Intellectual property or other information provided to ACT on condition of confidentiality
* Information covered by legal privilege or under negotiation including disciplinary and investigative information or related to access to internal audit reports
* Advocacy and communications strategies which would be compromised if made public before they were implemented.
* Fundraising information that could put ACT Alliance competitiveness at risk.

Information on ACT internal administration or operating systems is available on request from the ACT secretariat.

The ACT governing board is ultimately responsible for making decisions on ACTs open information boundaries. It is responsible for approving and ratifying any policy decisions in relation to this policy. The ACT executive committee is responsible for supervising the implementation of this policy in cooperation with the ACT general secretary. The general secretary is responsible for making decisions on specific information requests from the public in between governance meetings.

1. **Copyright and disclaimer**

All information and material posted on the ACT Alliance website are subject to ACT Alliance copyright and other individuals or entities linked to ACT Alliance.

ACT Alliance takes no responsibility for the content or information contained on other linked internet sites, nor does it exert any editorial or other control over those other sites.

No representation is made or warranty given, express or implied, as to the completeness or accuracy of information made available by ACT Alliance. The requestor shall apply discretion when using the information made available by ACT Alliance. ACT Alliance will not be liable for any direct or indirect loss arising from the use of the information.

1. **Information requests**

If the information is not available on the ACT Alliance website, the public can contact the ACT Alliance secretariat. Any inaccuracies or incorrect information in ACT public documents can also be reported to the secretariat administrator. All media enquiries should be handled by the ACT secretariat communications staff.

Additionally, a list of individual staff email contacts can be found on <http://www.actalliance.org/act-alliance/about/contact-info> depending on the nature of the information required. Request for information can also be made via post or telephone or fax at the following addresses:

**ACT Alliance**
Ecumenical Centre
150 route de Ferney
P.O. Box 2100
1211 Geneva
Switzerland
Phone: +41 22 791 6033
Fax: +41 22 791 6506

All requests will be responded to within 30 days, where possible. All requests for information related to an ACT member should be addressed directly with that member.

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1. As outlined in the ACT Founding Document 2009 and the ACT Code of Good Practice 2011 [↑](#footnote-ref-1)