

## Anti-Slavery International: Open Information Policy

- **Document created:** July 2015
- **Document approved** [by both Anti-Slavery International's Senior Management Team and Board of Directors]: July 2015
- **To be Revised** [by Learning and Accountability Coordinator]: July 2016

### 1. Anti-Slavery International's Commitment to Accountability

As one of our six prioritised organisational values, Anti-Slavery International is committed to being accountable to people affected by and vulnerable to slavery, partner organisations, members and supporters, donors, relevant governments and international institutions, and our staff. This commitment is proactively exercised through open and transparent work practices, such as publishing details of funding and evaluations, sharing information, and responding to requests for information. Full details of our approach to sharing information, including what we chose to protect and why, is included in our *Open Information Policy* (this document).

### 2. Policy scope and responsibilities

*Open Information* is a proactive approach to issuing organisational information publicly; Anti-Slavery International will do so in accordance with the guidance contained within this document. This policy describes the means and types of information that we will make publically available through accessible channels such as our website and the IATI register, and by request. Some information cannot be shared and this is described, along with the relevant rationale, in the exclusions section below.

As in many aspects of our work, Anti-Slavery International follows established good practice within the international development and human rights sectors; we embody our stated organisational values and are also guided by relevant UK legislation, such as the Freedom of Information act and Data Protection Act. As the comprehensive publication of information is a lengthy and on-going process, we will publish as much as is possible and commit to continually improving this.

The Head of External Relations is ultimately accountable for the implementation of this policy; each member of staff is responsible for compliance with the guidance herein.

### 3. The information that we publish and where to find it

Anti-Slavery International is committed to the publication of relevant information that is timely, accurate and useful to a range of stakeholders. This is appropriate to ensure that the public, partners and those who provide financial support are informed and have a clear understanding of our work. This commitment is proactively exercised through open and transparent work practices, including the publishing of financial project data via the International Aid Transparency Initiative system – IATI (see below).

#### 3.1. Organisational information

The following organisational information will be published on our website and revised, at least annually, where appropriate (denoted by \*). This list is not exhaustive and further information may also be made available.

- Anti-Slavery International’s vision, mission and values
- Anti-Slavery International’s annual plan
- Anti-Slavery International’s Open Information Policy\*
- Anti-Slavery International’s contact details, including the procedure for feedback and complaints\*
- The names and contact details of partner organisations, associations and affiliates\*
- Current projects\*
- Project evaluations\*
- The names and short profiles of Anti-Slavery International’s Board of Trustees\*
- The names and short profiles of Anti-Slavery International’s Senior Management Team\*
- The names of all Anti-Slavery International staff\*
- Equal Opportunities Policy\*
- Bribery and Corruption Policy\*
- Ethical Funding Policy\*
- Child Protection Policy\*
- Current donors\*
- Protected disclosure and whistleblowing policy\*
- Annual Narrative Review
- Audited Annual Report and Accounts

### **3.2. International Aid Transparency Initiative – IATI**

IATI is a standardised global system designed to make information about aid spending easier to access, use and understand. Anti-Slavery International undertook to publishing to the IATI standard in mid-2015 and so does not presently publish all project data. Our current commitment is to publish the data relevant to two projects within the current financial year (April 2015 – March 2016). Upon successful completion of this learning phase (on or before April 2016), we commit to publishing the relevant data for all subsequent new projects and the related implementation schedule.

The following information is required as a minimum for all projects published through the standard, online IATI register:

- Unique Project Identifier
- Project Title
- Brief Project Description
- Project Start and End Date
- Country or Region to which funds go
- Payments and Expenditure
- Project Status – active / closed
- Project Budget
- Annual and Forecast Budgets

#### **4. Information that we do not publish and why**

At times, it may not be appropriate for Anti-Slavery International to disclose some information; we will provide the relevant rationale in such cases.

**Safety and security:** Our primary concern is for the safety and protection of all those that are involved with or impacted by our actions. Unfortunately, due to the nature of the work we undertake, at times there is a genuine and significant danger involved in sharing certain details. Information that may jeopardise the safety of people involved in our project work, partners, staff or otherwise will not be disclosed.

**Privacy:** We will not disclose information that is, by its nature, private, such as the personal details of supporters, or where to do so would be in breach of legislation, such as the Data Protection Act.

**Confidential:** Some information is legally, commercially or contractually confidential in which case, Anti-Slavery International is not in a position to provide such information.

**Cost:** Where it is reasonably anticipated that the cost (time or financial) to disclose information is excessively onerous, such information may not be provided. Unfortunately, limited staff capacity may occasionally mean that some requests are unanswered.

**Historical:** Anti-Slavery International has been working to eradicate slavery for over 175 years; consequently, the resource investment necessary (time, human, financial) or incomplete historical records may mean that it is not possible to provide some material.

**Internal planning / relevance:** Documents that are commercially sensitive, related to future planned work, draft documents or requests for information that is reasonably deemed to be of ephemeral interest will generally not be disclosed. Information that would harm the financial interests of Anti-Slavery International or those of other parties involved will not be published. This may include, but is not limited to, detailed unit costs (e.g. individual salaries and payment rates), fundraising /marketing plans and documents related to projects which have not yet secured funding.

**Repeated / deceitful / offensive / unreasonable requests:** Should a person make repeated or unreasonable requests, correspond in an offensive or abusive manner, or be deceitful in their communication (such as false contact details), Anti-Slavery International may decline to correspond.

#### **5. Freedom of Information and Data protection**

- As a registered charity (1049160) and a Company by Limited Guarantee (3079904) in the UK, not a public body, Anti-Slavery International is not subject to the Freedom of Information Act 2000.
- Anti-Slavery International is subject to the limitations defined by relevant data protection and privacy legislation applicable in the UK.

#### **6. Requests for information**

### 6.1. How to make a request

All of the information referred to is currently available on Anti-Slavery International's website, or it will be published by October 2015: <http://www.antislavery.org/>

Please direct requests for additional information in writing as follows:

**e-mail:** [info@antislavery.org](mailto:info@antislavery.org)

**Post:** ANTI-SLAVERY INTERNATIONAL  
Thomas Clarkson House  
The Stableyard  
Broomgrove Road  
London SW9 9TL

### 6.2. Our commitment to responding to requests

Anti-Slavery International responds to communications and requests as promptly as possible; we aim to respond to requests for information within 20 working days.

## 7. Feedback (inc links to complaints or appeals procedures)

All feedback should be initially directed to the External relations Team via the following means:

**e-mail:** [info@antislavery.org](mailto:info@antislavery.org)

**Post:** ANTI-SLAVERY INTERNATIONAL  
Thomas Clarkson House  
The Stableyard  
Broomgrove Road  
London SW9 9TL

**Telephone:** +44 20 7501 8920

Please include your full name, e-mail address (if applicable), postal address and telephone number.

### What to do if you are not satisfied with the first response:

In a case where you may be unsatisfied with the initial response you receive, please write to the External Relations Team Manager at:

ANTI-SLAVERY INTERNATIONAL  
Thomas Clarkson House  
The Stableyard  
Broomgrove Road  
London SW9 9TL

The case will be reviewed and the External Relations Team Manager will be in touch within 20 days to inform you of progress.

Should this also be unsatisfactory, please contact to the Director at the same address. The case will be reviewed and you will then be informed of the final organisational decision.