

IMPLEMENTING THE WVI OPEN INFORMATION POLICY

(Includes guidance on reporting of serious incidents to the Disclosure Committee)¹

Making decisions on how to manage and share information **requires leaders to exercise judgement and discernment**, balancing a range of issues including requirements for compliance, learning, performance management and marketing alongside our commitment to honesty and transparency.

At various times leaders at World Vision will need to consider:

- how information is shared with other entities or groups within World Vision;
- whether certain information should be shared outside World Vision, and if so, how this might be done (when, how, to whom etc);
- whether information is of the type which can be shared routinely, either to the general public or as a contribution to learning across the sector, or whether information is of a sensitive nature requiring an additional level of consultation or oversight;
- which other parts of the organisation may be affected by the decisions they take, and therefore, who should be notified; and
- in what circumstances a local situation becomes so important that the decision process must be shared or passed on in a timely way, to others within the Partnership.

This document has been prepared to assist leaders when making decisions about the way in which information is shared.

Accountability and Transparency

World Vision's commitment to *accountability* is well documented. This commitment is embedded in our Core Values as an expression of our Christian identity.

Transparency lies at the core of our accountability. It refers to our openness and honesty in sharing information about: our activities; where and how these activities are taking place; how we are performing; our governance structures and decision making processes; our financial arrangements; our operational challenges; and, our environmental footprint.

Transparency has both internal and external aspects. World Vision Boards and Advisory Councils, 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 World Vision will "disclose" relevant information when this is appropriate to enable them to make valid decisions about World Vision and our work.

Expectations and standards

Expectations for NGO accountability and transparency are influenced by international and national standards for good governance that include principles of 'Freedom of Information'. Governments, multilateral organisations, large corporations, and increasingly NGOs have been called upon to develop

¹ See Attachment B

explicit policies around their willingness to share information more openly while reserving the right to withhold certain kinds of information where there are good reasons for doing so.

These expectations are reinforced by the commitments World Vision has made to external accountability frameworks such as the International NGO Charter of Accountability (and related reporting standards).

NGO accountability frameworks call for an increasing readiness to disclose information on all aspects of our work: governance, human and financial resources management, ethical marketing and fundraising, programme delivery across all Lines of Ministry and environmental sustainability.

It is no longer sufficient to point to the existence of relevant policies without providing evidence that there are systems in place to ensure that an organisation is implementing its policies and addressing failures to meet standards.

Partnership Disclosure Committee

A Disclosure Committee was established in the Global Centre in May 2009 to develop policies and procedures to encourage responsible management of greater transparency in information disclosure, balancing our commitment to accountability with other obligations to our various stakeholders.

The Disclosure Committee is chaired by the leader for Partnership Accountability and Integrated Review and comprises representatives of Legal, Finance, Risk Management, Communications and Global Accountability.

Open Information Policy

The Disclosure Committee developed the WVI Open Information Policy which was approved by the Operations Committee of the Senior Executive Team in March 2010.

The WVI Open Information Policy clarifies World Vision's approach to information sharing on the basis of a preference for openness unless there are valid reasons for withholding information. By adopting this approach, we enable our stakeholders to assess how we have made decisions; how we have managed our finances; and how effective our programmes have been. At the same time, appropriate disclosure of factual information on what has worked well and what has not gone to plan enhances opportunities for us to reflect and learn from experience to improve our stewardship and increase our effectiveness. It is also aimed at deepening our relationships with stakeholders by facilitating a better understanding of the challenges that we face in pursuing our Mission.

A copy of the policy is provided at **Attachment A**.

Reinforcing and supporting Line Management decision making

The Disclosure Committee's purpose in developing the Open Information Policy and the attached Guidelines is to reinforce and support Line Management decision making on information disclosure; however, steps will be taken to improve coordination across the several processes already in place and to ensure that guidelines for those processes include information on the Open Information Policy and associated guidelines.

Moving toward greater openness responsibly

The Open Information Policy requires staff to take operational and practical considerations into account when determining whether information may be shared or disclosed. The Policy lists certain categories of information that World Vision will not disclose to the public, including information which is:

- private;
- confidential;
- relevant to safety and security;
- legal advice; or
- an internal communication, process or administrative detail.

It is important to note that while the Open Information Policy expands the scope and type of information World Vision is prepared to share, it is not intended to alter existing protocols or procedures staff must follow before information is released. In other words, the Open Information Policy does not give staff an ‘open licence’ to release information without proper authorisation.

As we move toward greater transparency and openness we will need to be careful to ensure that this is undertaken in a measured and responsible manner. This process will involve a number of aspects including:

(i) Identification of existing documents or information that can be placed in the public domain. Identification of gaps in our existing suite of standard public information

A review of all of World Vision International policies is underway to ascertain which policies should be accessible to the general public. These guidelines will be updated when that work is completed.

(ii) Coordination with Knowledge Management , Communications and line management with regard to implementation of approved levels of information sharing and disclosure

Work has also commenced under the leadership of Global Knowledge Management to map and find ways to share more of the information World Vision holds relating to its approach to transformational development (including thematic and sectoral studies), humanitarian and emergency affairs, advocacy, child focussed ministry, child sponsorship, etc.

While some of this material is shared informally with colleagues in other NGOs, with donors (bilateral and multilateral organisations) and with centres for ‘development’ or humanitarian studies, a more systematic approach to this kind of information sharing would be consistent with our desire to help set ‘industry’ standards.

(iii) Guidelines for reporting of serious incidents or events to the Disclosure Committee

In the majority of cases, decisions about what information should and should not be shared internally or with a wider (external) audience will be made by leaders in the World Vision office nearest the incident or source of information; however, our inter-dependence is magnified by information technology and there may be occasions where other the other entities should be consulted before any disclosure is made.

*More detailed guidance on the reporting of serious incidents or events is provided at **Attachment B**.*

(iv) Programmatic information

If National Directors or Regional Leaders require clarification on the appropriateness of releasing specific programmatic information they should refer the matter to the Disclosure Committee for advice prior to release.

Feedback and Review

The Terms of Reference for the Disclosure Committee provide for review of the Open Information Policy and its implementation, also of the activities of the Disclosure Committee. Please send feedback on the implementation of the Policy and these guidelines to the Chairman of the Disclosure Committee, Partnership Leader for Accountability and Integrated Review (ian_curtis@wvi.org).

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WVI OPEN INFORMATION POLICY

1. World Vision is a Christian organisation which relies upon the trust of its stakeholders (the children we seek to serve, the communities with whom we partner, donors, sponsors, supporters, host governments, peer NGOs, churches, and the public) to fulfil its Mission. By holding ourselves 'accountable', we demonstrate that we are worthy of this trust.
2. *Accountability* is one of the principles incorporated in the World Vision Covenant of Partnership. The link between accountability and transparency is confirmed in resolutions of the World Vision International Board of Directors. Our *Core Values* require us to be open and factual in assessing our work and in our dealings with all of our stakeholders.
3. Our approach to putting these principles and values into action is to share information about our activities and operations openly unless there are compelling reasons for withholding it. By adopting this approach, we enable our stakeholders to assess how we have made decisions; how we have managed our finances; and, how effective our programmes have been. At the same time, an open flow of factual information on what has worked well and what has not gone to plan enhances opportunities for us to reflect and learn from experience to improve our stewardship and increase effectiveness.
4. This policy is approved by the senior management of World Vision International (WVI), and applies to WVI, including its branch offices around the world. After a period of evaluating implementation of this policy within WVI, the extension of this (or a similar policy) to all entities in the WV Partnership will be considered.
5. As part of our commitment to open and factual sharing of information, WVI publishes all necessary and pertinent information about WV in a wide range of material in print and/or on-line, including an Annual Review and reports on compliance with various 'accountability and reporting' frameworks that include information about our governance and decision-making processes, strategies, policies, programmes, and finances. If for some reason this information is not deemed adequate, WVI will review requests for additional or supplemental information.
6. World Vision is committed to sharing information openly, however, there are legal, operational and practical considerations that need to be taken into account, balancing our commitment to accountability and transparency with our obligations to other stakeholders, including our staff, sponsors, donors, our partners, and particularly the children and communities with whom we work. A list of the categories of information to which the "Open Information Policy" does not apply is provided below.
7. If the information sought is not readily available in World Vision publications or on our website, requests for information can be addressed either to the World Vision Office in the country concerned or emailed to World Vision International (info@wvi.org). Contact details for National Offices are available on the WVI website. We aim to respond to requests in a timely manner. If the information requested is not available or a request is denied, we will explain why.
8. World Vision is a 'global' partnership. Most information is published in the English language. Some information is also available in other languages. This policy applies to information requests addressed to World Vision International in English, French or Spanish.

World Vision will **not** disclose the following information to the public:

- **Private:** Information which by its nature is private to the individuals concerned. Private information may include personal information held by World Vision (such as name, address, social security number (or equivalent), financial information or health status) about any persons, whether employees, volunteers, sponsors, sponsored children or families, any other individuals.
- **Confidential:** Information may be confidential for legal, commercial or contractual reasons. It includes information received from or sent to third parties under an expectation of confidentiality and commercially sensitive information (such as matters under negotiation or in dispute or detailed fundraising plans and strategies).
- **Relevant to safety and security:** Information that, if disclosed could endanger the safety and security of any individual or jeopardize World Vision's ability to operate in a particular country or location.
- **Legal Advice.**
- **Internal communications, processes and administrative details:** To protect the integrity of our business processes it is essential to encourage the free flow of ideas and information internally. Unless intended for public circulation, we will not disclose: internal communications or documents (such as emails, working papers or drafts); documents relating to internal investigations, audits and review findings (such as office capability assessments) which are aimed at improving the performance of the organisation; information relating to internal World Vision administration or operating systems which have no direct effect outside the organisation.

World Vision's Open Information Policy will **not** apply in the following circumstances:

- **Stewardship:** As good stewards, we need to manage the resources required to respond to requests for information. We may decline to respond to requests where substantial information is already available and provision of additional information would take up significant staff time. Where we consider that the cost of disclosure, whether as a time cost or a monetary cost, would be disproportionate to the request, we may decline disclosure but will explain that this is the reason.
- **Bona fide requests** WV will only reply to bona fide requests, requiring that the individual or organisation provide verifiable contact details.
- **Vexatious requests:** Where in our opinion a person is making frivolous, excessive or abusive requests for information, we may consider that the request is vexatious, and decide not to respond.

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**REPORTING OF SERIOUS INCIDENTS OR EVENTS TO
THE DISCLOSURE COMMITTEE**

Organisational vulnerability needs to be managed well if an incident or major scandal occurs which could significantly damage World Vision’s reputation, fundraising capacity or licence to operate. Our governance structure and size (with over 40,000 staff) and our preference to work through partners, make it essential that we have systems in place for timely sharing of information internally, so that we can respond to adverse events in ways that reflect our Christian identity and minimise reputational damage.

Where we find we are in contravention of our commitments to accountability frameworks and our own policies, World Vision may decide to ‘disclose’ information regarding these events voluntarily, before the incident is known publicly. In other cases, there may be legitimate reasons for withholding such information. On other occasions, World Vision may find itself responding to inquiries or media reports and will need to decide what to disclose, when, where and to whom.

In the majority of cases, decisions about what information should and should not be published will be made by leaders in the World Vision office nearest the incident or source of information; however, our inter-dependence is magnified by information technology. Information spreads in minutes on the internet, where once it might have taken days or weeks. An incident in one entity can quickly affect other offices, a region or even the whole Partnership. There may be occasions when national and field staff may want or be expected to make a public disclosure of an incident, but this is needs to be a matter for consideration between regional leaders and national directors or Support Office CEOs. In each case, the decisions we make regarding disclosure must be made with the broader implications of disclosure in mind.

The aim is not to ‘centralise’ or second guess but rather, to ensure that serious incidents which may negatively impact or damage the reputation, integrity, fundraising capacity or license to operate of more than one entity within the World Vision Partnership are considered by the Disclosure Committee. For such events, World Vision leaders need to be able to have a helicopter view of the whole picture to ensure the Partnership is able to respond appropriately and in a timely manner. This is one of the roles of the Disclosure Committee.

The intention behind this document is not to duplicate existing processes or reporting channels, but to ensure that all relevant leaders in the Partnership are alert to World Vision’s commitment to disclose certain incidents in accordance with principles of accountability and processes which are in place to ensure that matters disclosed to parties outside World Vision are communicated in the right way.

What constitutes a ‘Disclosure Event’ which will be considered by the Disclosure Committee

A “**Disclosure Event**” is defined as:

“A serious event or incident which may negatively impact or damage the reputation, integrity, fundraising capacity or license to operate of more than one entity within the World Vision Partnership.”

The table below provides general guidance to help regional leaders, national directors and their teams, and others determine which types of incidents or events which may constitute Disclosure Events within particular contexts.

Determining whether an event or incident constitutes a Disclosure Event which should be reported to the Disclosure Committee **is ultimately a matter of discernment and judgement.**

Disclosure Event	Definition and Reporting Threshold
<p>Fraud</p>	<p><u>Definition:</u></p> <p>Dishonest activity causing actual or potential financial loss to any person or entity.</p> <p><u>Reporting threshold:</u></p> <p>All instances of fraud in excess of \$100,000 will be reported to the Disclosure Committee (via existing reporting channels for Misappropriation of Funds or Loss of Assets as set out in the Field Finance Manual).</p> <p>Instances of fraud involving a sum which is less than \$100,000 may be reportable to the Disclosure Committee where the circumstances or facts surrounding the incident warrant notification. This will ultimately be a matter of discernment and judgement. The measure here is not so much the amount of money involved; it is the degree of intent of the person alleged to have committed fraud, the type of betrayal of confidence it involves, the risk to the organisation if that fraud was brought to light by an outsider (rather than revealed by us) and the degree to which the impact of the fraud can be mitigated (for example, do local legal conditions enable us to prosecute?)</p> <p>Every incident, at whatever scale, should be discussed with the regional communications office.</p>
<p>Corruption</p>	<p><u>Definition:</u></p> <ul style="list-style-type: none"> • Political cronyism compromising WV impartiality • Diversion of funds for private use or profit • Diversion of goods/materials for private use or profit <p>Dishonest activity in which a director, executive, manager, employee or contractor acts contrary to the interests of World Vision and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity.</p> <p><u>Reporting threshold:</u></p> <p>All instances of corruption in excess of \$100,000 will be reported to the Disclosure Committee (via existing reporting channels for Misappropriation of Funds or Loss of Assets as set out in the Field Finance Manual).</p> <p>Instances of corruption involving a sum which is less than \$100,000 may be</p>

	<p>reportable to the Disclosure Committee where the circumstances or facts surrounding the incident warrant notification. This will ultimately be a matter of discernment and judgement.</p> <p>The measure here is not so much the value of the corrupt practice that triggers a report to the Disclosure Committee, as the degree of bad faith by the employee/s and the impact on the organisation's reputation if the corruption was brought to light by others. Note that significant attempts to cover up corrupt practice should be considered for reference to the Disclosure Committee far more seriously than 'casual' cronyism; but both will require corrective action.</p> <p>Every incident of this kind should be reported to the regional communications office.</p>
<p>Bribery</p>	<p><u>Definition:</u></p> <p>Offering, giving, soliciting or receiving anything of value in order to influence an action or decision in an improper or corrupt (and usually secret) manner. Can apply to relationships not only with public officials, but also with commercial vendors and partners.</p> <p><u>Reporting:</u></p> <p>Bribery is a criminal offense under the laws of many countries, and several countries also have laws prohibiting bribery outside of their own borders. Bribery anywhere therefore can have serious implications (including fines and prison terms) for the individuals involved, and for the corporate entity which employs them.</p> <p>Accordingly, any allegations of bribery involving World Vision personnel should be referred immediately to the WVI Legal Department for further review and analysis. The Legal Department will make further recommendations to management as to each specific matter, including as to appropriate reporting to the Disclosure Committee.</p>
<p>Protection issues: Abuse or sexual exploitation</p>	<p><u>Definition:</u></p> <ul style="list-style-type: none"> • Abuse to a child <u>or</u> adult by WV staff, sponsor or visitor (includes any failure of Child Protection protocols) • Allegation of sexual abuse or gender related violence or gender-based harassment involving staff <p><u>Reporting threshold:</u></p> <p>All abuse of children in relation to World Vision's work is serious and reportable. In these cases the standards of the Child Protection Incident protocol are to be followed and the Disclosure Committee will be informed via existing child protection incident reporting channels as appropriate.</p> <p>Allegations of inappropriate gender-related behaviour, especially by leaders, should be reported to P&C for confidential investigation. Where</p>

	an investigation results in confirmation of the incident, or where the allegation is likely to become known to others, the Disclosure Committee will be informed by P&C as appropriate. So should the nearest relevant communications advisor with media training.
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Responsibilities of leaders in relation to Disclosure Events

- Ensuring that an adequate system of internal controls or procedures is in place and understood by all staff, to ensure that information relating to a potential Disclosure Event will be captured and acted upon through the appropriate channel.
- Upon becoming aware of a Disclosure Event it is reported through the appropriate channel or leadership network [see diagram below].
- Any recommendations of the Disclosure Committee, the regional office and Global Centre external communications relating to the Disclosure Event are put into effect.
- All internal correspondence about a Disclosure Event is handled with secure, confidential means, and any questions or concerns about legal aspects are directed to the Legal Department in a confidential manner, which will normally constitute a protected privileged communication.

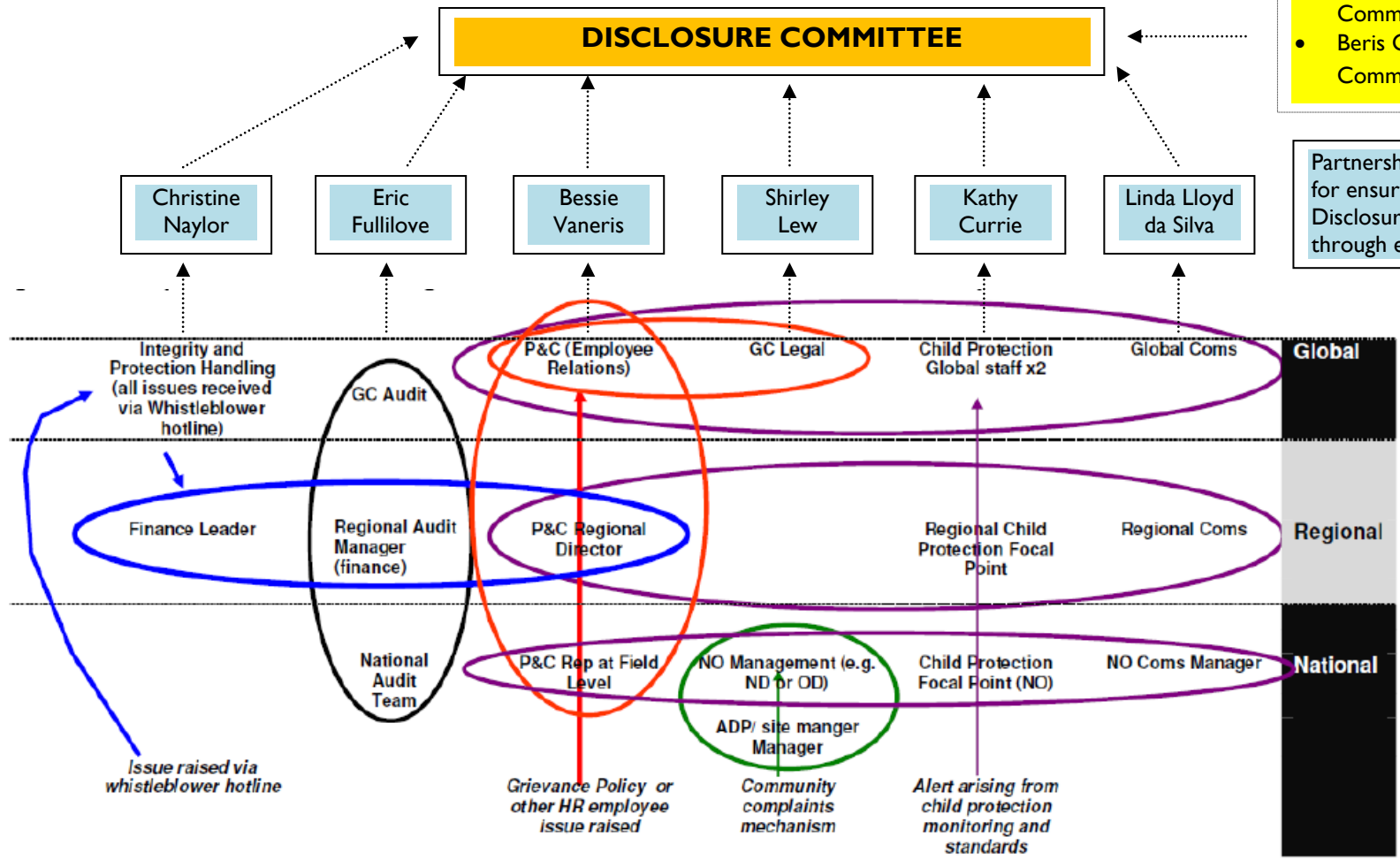
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Reporting channels to Disclosure Committee

Disclosure Events may also be reported directly to:

- Ian Curtis (Disclosure Committee Chair)
- Beris Gwynne (Disclosure Committee Convenor)

Partnership Leader responsible for ensuring DC is informed of Disclosure Events reported through existing channel



Key	
	IPH – Whistleblower investigation processes
	Finance and Audit processes
	Community Complaints handling (H-Account etc)
	P&C (Employee Relations)
	Child Protection