Norwegian Refugee Council
Open Information Policy and guidelines

"Transparency is a characteristic of governments, companies, organisations and individuals that are open in the clear disclosure of information, rules, plans, processes and actions."

<div align="right">Source: Transparency International</div>

Transparency is a prerequisite for accountability

Norwegian Refugee Council (NRC) is committed to being accountable to all stakeholders – our beneficiaries, staff, host authorities and donors, as well as the general public. Transparency is a prerequisite for accountability.

This policy outlines what information we share and how we do it. The policy is based on the premise that all information will be publicly disclosed.

Non-disclosure must be based on well-founded and predefined reasons – such as the safety of our staff, the privacy of our beneficiaries, our ability to deliver aid to our beneficiaries, the integrity of our organisation or if it harms our financial interests. Thus, this policy also outlines what we do not share, and why.

It is the expressed aim of our Management and Board that transparency should be at the core of the organisation's mission to promote and protect the rights of refugees and displaced people. We strive towards the highest standards of openness.

NRC recognizes that making information available is not sufficient to achieve transparency. The publication of large amounts of raw information may breed opacity rather than transparency.

The information must thus be accurate and collocated in a way that makes it easily accessible and comprehensible for all stakeholders. The information must also be relevant and timely, i.e. it must be made available in sufficient time to permit analysis, evaluation and engagement by stakeholders.

Scope, implementation and responsibility

The Open Information Policy constitutes our normative framework, and applies to all countries where NRC has offices and programmes.

NRC commits to distributing the policy throughout the organisation and to ensure adherence at all levels

The External Relations Department has the overall responsibility for the Open

Information Policy. The Department is also responsible for distribution, for building awareness and for clarifying roles and responsibilities.

Line Managers must ensure implementation of the strategy in their unit.

Staff will be introduced to the policy during their induction training.

NRC's Internal Audit and Quality Support Unit will monitor compliance with the policy.

The ICT Department provides necessary technical support.

The policy is publicly available through the NRC website – www.nrc.no

Norway – a transparent society

NRC is a Norwegian organisation, and operates within a framework that sets high standards regarding openness and transparency. The Norwegian Constitution, National Archives Act and national record-keeping standard, and the Freedom of Information Act constitute the regulatory framework.

Although only applicable to public information, civil society in Norway is expected to strive towards the same ideals and standards. Thus the regulatory framework and the way information is made accessible to the public by the Norwegian Government serves as our benchmark.

Compliance with reporting mechanisms and standards

NRC is committed to publishing information in compliance with national and international reporting mechanisms and standards, aimed at increasing aid transparency.

NRC is a signatory of the International Aid Transparency Initiative (IATI), which aims to make information about international aid easier to find, use and understand. NRC publishes information through IATI on a quarterly basis.

This information is available on the IATI website, as well as the NRC website, along with a copy of NRC's implementation schedule, which outlines the organisation's plans to enhance the scope of the information it routinely makes publicly available.

NRC complies with the reporting requirements of its funding partners and key stakeholders by producing regular project reports, which outline progress towards agreed objectives.

As a Norwegian based organisation, NRC submits reports and information to Norwegian authorities, as required under Norwegian law.

NRC is registered in the Norwegian Fundraising Registry (Innsamlingsregisteret) – administered by The Norwegian Control Committee for Fundraising (Innsamlingsrådet). Organisations that sign up commit to specified fundraising standards and are monitored regularly.

What we share

These are the main categories of documentation, which are accessible through our website or upon request:

- **Overreaching, governing documents –** such as policy papers.

- **Organisational chart and role mandates, including key contact details**

- **Programme information** – core competencies and information about what programmes we run in which countries.

- **Financial information** – annual reports to the Norwegian government and quarterly reports to IATI.

- **Overview of NRC's major donors**

- **Selected Strategies and Plans of Action –** such as the Global Advocacy Policy

- **Selected contracts, Partnership Agreements and Memorandums of Understanding –** upon request

- **External evaluations**

- **Closed corruption cases**

Please consult appendix 1 for a more detailed list of categories of documents shared by NRC.

What we do not share

These are the main categories of documents, which we do not share:

- **Personal details about our staff**

- **Technical and thematic procedures, handbooks, standards and position papers –** such as documents concerning security, internal audits or logistical information.

- **Most Strategies and Plans of Action –** such as branding and financial strategies or Annual Plans of Action.

- **Selected contracts, Partnership Agreements and Memorandums of Understanding –** when there is a non-disclosure clause or when disclosure will harm our financial interests or may entail safety and security risks.

- **Documents and minutes from NRC Board and management meetings**

- **Documents for internal learning –** such as internal reviews

Please consult appendix 2 for a more detailed list of categories of documents not shared by NRC.

NRC may, on a case-to-case basis, decide to share information that is normally not public with our strategic institutional donors.

Criteria for not sharing information

These are some of the reasons why we may be unable to disclose information:

- **Safety and security:** NRC works in some of the most challenging conflict and disaster areas in the world. Information will be withheld if disclosure may jeopardise the safety of our staff or beneficiaries, or our ability to deliver programme activities.

- **Privacy:** Data protection legislation or an individual's right to privacy might prevent disclosure. We do not, for example, share personal details about our staff, beneficiaries or individual supporters, unless explicitly permitted to do so, and we are particularly sensitive to the privacy of minors.

- **Confidentiality:** We cannot disclose information bound by confidentiality on legal, commercial or contractual grounds.

- **Copyright:** We may not be able to disclose information if copyright belongs to someone other than NRC. If so, requests will be referred to the copyright holder.

- **Time and cost:** We may decline disclosure if the request proves unreasonably time or cost consuming, or if, in our judgement, the request will distract our staff from carrying out essential programme activities.

- **Irrelevance:** We may decline disclosure if we find the request to have no discernible public benefit. Examples may be internal administrative documents or draft documents.

- **Offensive or unreasonable requests:** We may decline disclosure if a person behaves in an offensive or abusive manner, or aims to use the information for unreasonable purposes.

- **Commercial sensitivity:** We believe in sharing best practices, to contribute to continuous and collective improvement of the humanitarian sector. However, we will not publish information that would harm either the financial interests of NRC or those of other parties involved. This may include, but is not limited to, detailed unit costs (e.g. individual salaries and payment rates), fundraising and marketing plans, guidelines and handbooks, or documents relating to projects which have not yet secured funding.

- **Historical information:** This policy addresses information generated after 1 June 2015. Requests for earlier material may be declined due to the cost of retrieving it, or that the documentation was not produced with public disclosure in mind, and thus include information covered by some of the criteria above.

Corruption disclosure policy

NRC acknowledges that corruption may occur even under the best of control systems, due to the challenging environments in which we operate.

Our policy is to be open and transparent about corruption at all levels. By 30 June each year, we publish an overview of the corruption cases that were closed the previous year.
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How to access information

All relevant material shared by NRC is accessible in a digital format.

Our website, www.nrc.no, is the main access point to documents and information shared by NRC.

You may also request print copies of certain documents. We may, however, decline to provide print copies if the cost is too high, or if it will be unreasonably time consuming to do so.

We will respond to all requests as soon as possible – normally within 7 working days, and a maximum of 30 working days. Request can be sent to: openinformation@nrc.no.

Oral questions may be addressed to the External Relations Department at the Head Office in Oslo: +47 23 10 98 00

How information is shared internally

The NRC web site also serves as the main entry point to information for all staff. Non-public information is shared with our staff through the NRC intranet and by e-mail.

Languages and universal access

English is our main working language. Thus, most information is made available in English, with the exception of documentation specifically designed to comply with Norwegian regulations, and agreements and documents at country-level in countries where French, Spanish or Arabic are the official languages.

As a registered Norwegian NGO, we also provide a number of central documents in Norwegian.

Key documents (policies, handbooks and tools) are also translated into the main international languages – such as Spanish, French and Arabic.

Information to beneficiaries is, as a matter of principle, provided in local languages.

Norwegian authorities have implemented regulations on universal design of web sites providing public information. Although not bound by these, NRC strives to comply with the regulations, to facilitate access to information by for instance hearing or visually impaired persons.

Beneficiary access to information and feedback mechanisms

Our beneficiaries are our main stakeholders. NRC is committed to ensuring their access to relevant programme information.

NRC's beneficiary complaints and feedback mechanism ensures that our programme activities respond effectively and appropriately to the needs of our beneficiaries at all times.

Appeals and complaints

If you are not satisfied with the reasons given by NRC for not sharing a document, you may request a review by contacting NRC at the following address: openinformation@nrc.no. or: Norwegian Refugee Council, Box 148, Sentrum, 0102 Oslo, Norway. Please mark the

e-mail or letter with "Request for review of non-disclosure decision".

The Director of the department, under which the case is mandated, will review the case. In particularly difficult cases, or when important principles are involved, the NRC Ethics Board may also review the case.

NRC also welcomes feedback on the information we share, as well as our operations in general.

Under Norwegian law consumers can submit complaints about marketing methods with the Norwegian Consumer Ombudsman (Forbrukerombudet). The Ombudsman monitors marketing activities and considers complaints from consumers. It has the authority to ban unlawful marketing.

Copyright and legal implications

This policy is for information only. It is not a binding contract and does not confer legal rights on any person. Individuals may, however, have rights concerning their personal data held by NRC, under applicable law.

NRC reserves all rights (including copyright) to any information and material shared under this policy.

Version 2, 21 September 2016

Appendix 1:

List of categories of documents shared by NRC

Overreaching, governing documents

Information/document	Available from		Language(s)
	Website	**On request**	
NRC Articles of Association	☐		English
NRC Policy Paper	☐		English
NRC Governing and Reporting Model	☐		English
Organisational chart	☐		English Norwegian
NRC Protection Policy	☐		English Arabic
NRC Gender Policy	☐		English
NRC Code of Conduct	☐		English
NRC Anti-Corruption Policy	☐		English
NRC Security Policy	☐		English
NRC HR Policy	☐		English
NRC Programme Policy	☐		English Arabic
NRC Communication Policy	☐		English
NRC Learning Policy	☐		English
NRC Civil Military Policy	☐		English

Programme information, reporting, evaluations

Information/document	Available from		Language(s)
	Website	**On request**	
Programme information – core competencies and information about what programmes we run in which countries at all times	☐		English Norwegian
NRC Annual Report	☐		English
Quarterly financial reporting to IATI	☐		English
External evaluations	☐		English
Closed corruption cases	☐		English

Strategies and Plans of Action

Information/document	Available from		Language(s)
	Website	**On request**	
NRC Strategy for Global Advocacy	☐		English
NRC Strategic Objectives (Overall)	☐		English
Budgets (Overall)	☐		English

Technical and thematic procedures, handbooks, standards, position papers

Information/document	Available from		Language(s)
	Website	**On request**	
Selected advocacy documents on specific issues		☐	English

Contracts, Partnership Agreements and Memorandums of understanding

Information/document	Available from		Language(s)
	Website	**On request**	
Contracts		☐	English
Partnership Agreements		☐	English
Memorandums of understanding		☐	English

Appendix 2:
List of categories of documents not shared by NRC

Overreaching, governing documents

Information/document	Reason for not sharing
Documents and minutes from NRC Board Meetings	Security/privacy/confidentiality/commercial sensitivity
Documents and minutes from NRC management meetings	Security/privacy/confidentiality/commercial sensitivity

Technical and thematic procedures, handbooks, standards, position papers

Information/document	Reason for not sharing
Security – Crisis contingency plans and other security related documents	Security
Human resources – such as personal details of staff: home address, family details, income, sexual orientation, illness etc.	Privacy and security
Selected financial reports – such as on-going financial reporting and quarterly reports	Commercial sensitivity
Logistical information	Security
Information and communication technology (ICT) solutions, set-up	Security
Expert Deployments	Privacy and security
Learning, Selected Monitoring and Evaluation data –	Privacy, security, commercial sensitivity
Internal audits	Security, commercial sensitivity
Selected advocacy documents on specific issues	Commercial sensitivity
Documents relating to donor relations/donor help desk	Commercial sensitivity
Communications handbooks, policies	Commercial sensitivity, security
NRC position papers (related to media messages and advocacy)	Commercial sensitivity, security
Marketing strategies plans and budgets	Commercial sensitivity

Operational Strategies and Plans of Action

Information/document	Reason for not sharing
Global Financing Strategy	Commercial sensitivity
Branding Strategy	Commercial sensitivity
NRC Strategic Objectives – on department, region, country, and representation office levels	Commercial sensitivity
Plans of Action – all levels: NRC overall, department, region, country, and representation office.	Security, Commercial sensitivity
NRC Budgeting and Planning Instructions	Commercial sensitivity
Budgets – on department, region, country, representation office levels	Commercial sensitivity
Strategy process – guidelines, procedures, standards	Commercial sensitivity