

## Bond's Open Information Policy

### Scope and responsibilities

This policy sets out the information that Bond (Registered Charity no. 1068839) will make publically available, both through our website and on request. It also sets out information that is excluded from this policy<sup>1</sup>, and how to appeal decisions relating to some types of exclusions. It is informed by best practice within the UK international development sector and existing legislation in the UK, where Bond is a registered charity. This includes:

- The Freedom of Information Act
- Charities Regulation Act 2008
- Data Protection Act
- UK Aid Transparency Guarantee (for funding from DFID)
- International Aid Transparency Initiative

Individual member organisation information provided to us via the membership process and information provided to members as a paid-for benefit, for example training course material, are outside the scope of this policy.

Overall accountability for the implementation of this policy will lie with the Director of Membership and Communications. Compliance with this policy is the responsibility of all staff within Bond. Specific accountabilities are as follows

- Publishing of information, responding to information requests, complaints procedure: Director of Membership and Communications.
- Provision of information for publication and information in response to requests: Bond's Directors.
- Review and update of this policy: Transparency Adviser

- This document was created: September 2014.
- This policy was discussed by Bond's Management Team on 26 August 2014 and approved by Bond's Board of Trustees on 11 September 2014.
- It is owned by: Director of Membership and Communications
- **It is due for review: September 2015**

### How to make a request for information

All of the information listed in this policy is or will be openly available on our website. To request information that isn't listed, or to request a more accessible format, please use the contact information on our website at <http://www.bond.org.uk/contact-us.php> or the details below.

We aim to respond initially within 5 working days, and respond fully within 20 working days of receipt of your request.

Email: [membership@bond.org.uk](mailto:membership@bond.org.uk)

---

<sup>1</sup> There may be occasions when Bond may be subject to a legal requirement to disclose information currently covered by our exclusions, at which point the legal requirement will override this policy.

Postal address:  
Director of Membership and Communications  
Bond  
Society Building  
8 All Saints Street  
London  
N1 9RL

If you would like to appeal any response where the information you have requested is subject to exclusions, please follow the complaints procedure in Appendix I. Please also note that some categories of exclusion are not open to appeal. See page 8 for more information.

If you are from a Bond member organisation, there are also other ways to raise your concerns. You can contact the Board at any time or the Chief Executive and staff at Bond. Your issue can be raised in confidence and we will help you find the best route to bring any appropriate concerns to the wider membership.

### **Bond's commitment to transparency**

Transparency lies at the core of our accountability towards our staff, our members and our supporters. It refers to our openness and honesty in sharing information about our activities, our performance and learning as an organisation, our governance and decision making processes and our financial arrangements.

Transparency has both internal and external aspects. Bond's trustees, 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 Bond will share timely, relevant information to enable them to make informed decisions about Bond and our work.

We will make information available in order to increase our transparency to our key stakeholders and to enhance our own effectiveness in achieving our mission. We will model best practice to others, including our members and those we support to increase their own transparency. We will also support the collective effort among international development actors to improve coordination through provision of standardised information on our activities, for example through IATI.

This Open Information Policy sets out Bond's approach to information sharing on the basis of a preference for openness unless there are valid reasons for withholding information (see the Exclusions section of this policy). By adopting this approach, we enable our stakeholders to assess how we have made decisions, how we have managed our finances, how effective our programmes have been and how we learn from the challenges we face.

### **Who are we transparent towards?**

Bond's key stakeholders in terms of transparency are our trustees, staff and volunteers, our member organisations and our supporters including donors and partners. We also consider a key stakeholder group to be the people and communities in the South who are engaged with the activities of our members and for whom our members' effectiveness is crucial.

In addition, we also have a responsibility to ensure we communicate information that is in the public interest in relation to sources of funding that originate from public money and our registered charity status.

## Transparency in the Bond Charter

Bond is committed to all the Principles within the Bond membership Charter. Principle 11 covers transparency:

“We will be open, transparent and honest about our structures, governance, mission, policies, finances and activities. We will communicate actively with stakeholders about our activities and make information publicly available (mindful of the security implications of so doing). We will be transparent as to what standards and codes of conduct we seek to comply with, and ensure that policies are in place that enable and encourage staff to draw management or Board attention to activities that may not comply with the law or our mission and commitments, including the provisions in this Charter.”

### What information is shared under this policy?

The following is not a definitive list but indicates the status of the most common types of information that is shared by organisations within the development and charity sector. Bond may also share information not included on this list via our website [www.bond.org.uk](http://www.bond.org.uk) or via our members' space at [www.my.bond.org.uk](http://www.my.bond.org.uk).

|                     | Type of Information                               | Currently available   | Available by September 2015 <sup>2</sup> | Exclusion categories that may apply (see page 6)                                      |
|---------------------|---|---|--|---|
| <b>Organisation</b> | Mission, vision, strategy                         | <a href="http://www.bond.org.uk/about-us">http://www.bond.org.uk/about-us</a>                                   |  | None  |
|                     | Bond's memberships and affiliations               | <a href="http://www.bond.org.uk/about-us">http://www.bond.org.uk/about-us</a>                                   |  | None  |
|                     | Open information policy                           | <a href="http://www.bond.org.uk/about-us/open-information">http://www.bond.org.uk/about-us/open-information</a> |  | None  |
|                     | Bond contact details and complaint procedure      | <a href="http://www.bond.org.uk/contact-us.php">http://www.bond.org.uk/contact-us.php</a>                       |  | None  |
| <b>Membership</b>   | Member Charter                                    | <a href="http://www.bond.org.uk/about-us/charter">http://www.bond.org.uk/about-us/charter</a>                   |  | None  |
|                     | Names and contact details of member organisations | <a href="http://www.bond.org.uk/membership-directory3.php">http://www.bond.org.uk/membership-directory3.php</a> |  | Ownership of data.  |
|                     | Membership criteria and standard fees             | <a href="http://www.bond.org.uk/about-us/join#fees">http://www.bond.org.uk/about-us/join#fees</a>               |  | Ownership of data. (eg. Information about fees paid by each individual organisation). |
|                     | Membership benefits                               | <a href="http://www.bond.org.uk/about-">http://www.bond.org.uk/about-</a>                                       |  | Ownership of data. (Information about   |

<sup>2</sup> Bond's website is currently undergoing a restructure which will be completed mid-2015.

|                                 | Type of Information   | Currently available  | Available by September 2015 <sup>2</sup> | Exclusion categories that may apply (see page 6)   |
|---------------------------------|---|--|--|--|
|                                 |   | us/members-guide   |  | benefits accessed by each individual organisation).  |
| <b>Governance and Structure</b> | Board of Trustees – people and roles in decision making process | <a href="http://www.bond.org.uk/about-us/board">http://www.bond.org.uk/about-us/board</a>  |  | Privacy.   |
|                                 | Minutes of quarterly Board meetings                             | <a href="http://www.bond.org.uk/about-us/board">http://www.bond.org.uk/about-us/board</a>  |  | Confidentiality; status.   |
|                                 | Annual General meeting processes, Standing Orders               | <a href="http://www.bond.org.uk/about-us/agm">http://www.bond.org.uk/about-us/agm</a>  |  | None   |
|                                 | Staff - people and roles in decision making process             | <a href="http://www.bond.org.uk/about-us/staff">http://www.bond.org.uk/about-us/staff</a>  |  | Privacy.   |
|                                 | Number of staff employed on salaries over £60,000.              | <a href="http://www.bond.org.uk/about-us/accounts">http://www.bond.org.uk/about-us/accounts</a>                                  |  | Will be reported in line with requirements of Charities SORP FRSE.   |
|                                 | Whistleblowing policy   |  | On website                               | None   |
|                                 | Equal Opportunities Policy                                      | <a href="http://www.bond.org.uk/jobs/work-for-bond">http://www.bond.org.uk/jobs/work-for-bond</a>                                |  | None   |
| Finance and grants              | Income and expenditure  | Audited Accounts<br><a href="http://www.bond.org.uk/about-us/accounts">http://www.bond.org.uk/about-us/accounts</a>              |  | Details of funders, activities and amounts received which are subject to exclusion on the grounds of confidentiality. <sup>3</sup> |
|                                 | International Aid Transparency Initiative data                  | Bond website:<br><a href="http://www.bond.org.uk/about-us/open-information">http://www.bond.org.uk/about-us/open-information</a> |  | Data which falls under our exclusion categories  |

<sup>3</sup> Bond is committed to working with our funders to encourage them to become more transparent.

|                    | Type of Information   | Currently available   | Available by September 2015 <sup>2</sup> | Exclusion categories that may apply (see page 6) |
|--------------------|---|---|--|--|
|                    | Corruption and fraud policy   |   | Website                                  | None   |
|                    | Procurement policy  |   | Website                                  | None   |
|                    | Fundraising policy  |   | Website                                  | None   |
| <b>Performance</b> | Strategy  | <a href="http://www.bond.org.uk/about-us/strategy">http://www.bond.org.uk/about-us/strategy</a>                           |  | None   |
|                    | Annual summary of progress against our charitable objectives and strategy.          | Trustees Annual Report<br><a href="http://www.bond.org.uk/about-us/accounts">http://www.bond.org.uk/about-us/accounts</a> |  | Confidentiality; status.                         |
|                    | Summary of annual objectives published at the start of each financial year.         |   | Website                                  | Confidentiality; status.                         |
|                    | Regular summary of progress against objectives.                                     |   | Website                                  | Confidentiality; status.                         |
|                    | Names, roles and contact details of the main partners we work with.                 | <a href="http://www.bond.org.uk/about-us/open-information">http://www.bond.org.uk/about-us/open-information</a>           |  | None   |
|                    | Plans and results relating to those activities which are publically (grant) funded. | <a href="http://www.bond.org.uk/about-us/open-information">http://www.bond.org.uk/about-us/open-information</a>           |  | Confidentiality; status.                         |

### Data protection and privacy

Bond is subject to data protection and privacy legislation, and therefore we are unable to disclose personal private data covered by this legislation without consent, unless we are obliged or permitted by law to do so.

### Freedom of Information

As a charity, Bond is not a public body and therefore is not subject to the UK's *Freedom of Information Act 2000*. However, Bond is committed to working to increase the openness and availability of the information listed in this policy.

### Progressive publication

Bond is committed to supporting trustees, staff and volunteers to value transparency and open information and to ensuring that we have cost-efficient systems in place to make information available, including an improved website. However, this will take time. Therefore Bond will follow a

path of progressive publication, publishing what we can now and committing to publishing additional information by September 2015.

### **Circumstances under which we may be unable to provide information**

If you request information from us, we may not be able to provide you with all the information you require. If all or part of the information you have requested falls under one of the following categories, we will write and let you know the reason we will not share it. You will have the opportunity to appeal this decision through our complaints procedure for some categories (indicated). For information about the complaints procedure, please see Appendix I.

- **Ownership of the data:** you may ask us to disclose information about a member that is not our right to disclose. This is outside of the scope of this policy and we will ask you to contact the member organisation directly. This decision is not subject to appeal.
- **Privacy:** where disclosure would breach data protection legislation or an individual's right to privacy. For example, we will not share the personal details of our staff, volunteers or individual supporters. This decision is not subject to appeal.
- **Confidentiality:** the information is confidential on legal, business or contractual grounds. This decision is not subject to appeal. Where Bond has grants that fall within this exclusion category, we are committed to working with our funders to move towards allowing us to share information with our stakeholders.
- **Intellectual Property Rights:** The IPR for a piece of work belongs to someone else and we cannot give permission for its use. This decision is not subject to appeal.
- **Security:** the disclosure of information may present a risk to the safety and security of staff and operations, either for Bond or other organisations.
- **Cost:** the financial or time cost of disclosing the information would be unreasonably high. Bond is a small organisation and we need to balance our commitment to transparency with our delivery of results, especially where it involves public or member funds. Appeal via complaints procedure.
- **Membership benefit:** information shared with members as part of a paid membership benefit or service, for example through the [www.my.bond.org.uk](http://www.my.bond.org.uk) member site or Health Check service. Appeal via complaints procedure.
- **Status:** The information is in draft state for staff review only, is an internal communication or an internal administrative or management document. Appeal via complaints procedure.
- **Vexatious, offensive or unreasonable requests:** we may decline to correspond if a person behaves in an offensive or abusive manner, aims to obtain information by deceit (for example by using false contact details or other misrepresentation) or engages in unreasonable conduct such as repeatedly asking for the same information. Appeal via complaints procedure.
- **Historical information:** if the information requested is historical, it may be difficult and costly for Bond to obtain archived material. Appeal via complaints procedure.

### **Copyright and legal information about this policy**

This policy is for information only, and therefore is not a binding contract and does not confer legal rights on any person. Bond reserves intellectual property rights for information and materials provided under this policy, including those materials distributed under an open license.

## Bond Complaints Procedure

### Right of complaint

All Bond members, service users and the general public have the right of complaint in respect of Bond's services and activities, members, some categories of exclusions within Bond's open information policy or specific conditions of membership. This right is stated on the website, and further details can be obtained from the Bond secretariat.

### Dealing with complaints

#### ***Stage 1: issuing a complaint letter***

All complaints should be addressed to the Director of Membership and Communications. The Director will be the first point of contact and are responsible for acknowledging complaints and ensuring they are fully investigated.

Complaints should be written and received as either a letter or an email. This needs to include: your contact details (name, address, telephone number and email address) and information about the nature of the complaint (for example, the name of the person or organisation you are complaining about and the date the incident occurred) and your desired outcome of the complaint. Any complaint received will be acknowledged within five working days.

#### ***Stage 2: investigating and dealing with the complaint***

It is the responsibility of the Bond secretariat to deal in the first instance with all complaints about Bond services, activities or about issues relating to membership of Bond. All complaints will be taken seriously and positive solutions sought.

It is likely that further investigation is needed and this will be conducted by staff within the Bond secretariat; The complainant may be contacted to help this process as will the person or organisation against whom the complaint has been lodged. The investigation should take no more than 10 working days.

#### ***Stage 3: communicating the decision***

Once the investigation is complete and conclusions drawn, the complainant will be contacted in writing within 20 working days of the original complaint and told of any outcomes and further actions.

#### **Stage 4: complaints and appeals panel**

Most complaints will be dealt with by the Bond secretariat without recourse to a formal appeals procedure. However, if the complainant is unhappy with the outcome, they can write to the Chief Executive within 20 working days of the decision to request an appeal hearing. If the appeal has reasonable grounds and it is not vexatious, the Chief Executive can convene a complaints appeal panel, the purpose of which is:

- to act as final arbiter and decision-maker for complaints about Bond with respect to services and activities of Bond, including those carried out by Bond members in Bond's name; and
- to act as a final level of appeal for Bond members in dispute with Bond (for example, over non-payment of membership fees)

## **Panel terms of reference**

The panel is accountable to the Board for following correct procedures and adhering to agreed standards of process, but has full delegated responsibility for decision-making. There is no further right of appeal beyond this panel.

## **Operation of the Panel**

- A panel of three board members will be formed when requested by the Chief Executive.
- The panel members will be selected on a rota basis taking into consideration particular expertise and any potential conflicts of interest.
- The panel will aim to reflect Bond's range of membership, as well as aiming for a diverse membership and gender balance.
- The panel will elect its own Chair.
- The panel Chair will be responsible for the process of the panel, including communication with all relevant persons and the gathering of evidence
- The panel Chair will also be responsible for ensuring the panel process adheres to the procedures and standards laid down in relevant Bond policies
- The Chief Executive will ensure that the panel is provided with appropriate administrative support and advice as requested
- The panel will aim to reach decision by consensus, will gather what evidence it needs, and will communicate its decision to the relevant parties
- The panel may also make recommendations, which will be communicated to relevant parties, as well as to the Chief Executive
- The Chair of the Panel will report its decision to the Chair of the Board together with any recommendations for future policy or procedures resulting from the hearing.
- The decision will be communicated to the complainant within 20 working days of the original appeal request.
- There is no further stage of appeal.

## **Contact details**

If you require further information or wish to submit a complaint, please contact:

Director of Membership and Communications  
Bond  
Regent's Wharf  
8 All Saints Street  
London  
N1 9RL  
Email: [membership@bond.org.uk](mailto:membership@bond.org.uk)