

Open Information Policy

Oxfam Novib is committed to being transparent in its work and accountable to its stakeholders, in particular people living in poverty.

Oxfam Novib shares information with people living in poverty, partner organisations, and the public, and is also accountable to its staff, volunteers, supporters, donors, suppliers and host governments.

The information Oxfam Novib publishes and the way Oxfam Novib responds to requests for information, are important aspects of accountability. Oxfam Novib will proactively publish information, and on request will disclose information, or give reasons for any decision not to disclose (for example, to respect confidentiality or privacy). Oxfam Novib's key criteria for the decision will be the impact on its mission, to overcome poverty and suffering.

Oxfam Novib and the legislation regarding right of access to public information (WOB)

Oxfam Novib is registered as a foundation, not a public body, and thus not formally subject to the "Wet Openbaarheid Bestuur (WOB)", a law that assures the right of public access to government information. In framing this policy, Oxfam Novib respects the WOB Act's policy aims; information should be disclosed unless there is a good reason for withholding it, or that cost of disclosure would be disproportionate."

Oxfam Novib and Data Protection and privacy legislation

This policy is subject to Dutch and European Union data protection and privacy legislation. Accordingly Oxfam Novib will not disclose data about living individuals where this is prohibited under applicable law. See Oxfam Novib's Privacy statements:

<http://www.oxfamnovib.nl/Privacy.html> (Dutch) and

<http://www.oxfamnovib.nl/Supporting-Content-Privacy.html> (English)

What information does Oxfam Novib publish and in what media

A large amount of information is published on Oxfam Novib's website, whether on its main site www.oxfamnovib.nl or on the site of the Oxfam confederation www.oxfam.org. Oxfam Novib publishes its data on [International Aid Transparency Initiative](#), read more about Oxfam Novib's work on aid transparency [here](#). This policy applies to Oxfam Novib. Oxfam Novib is a member of [Oxfam International](#), a confederation of 17 Oxfams. Where a request is related to another Oxfam, Oxfam Novib will forward that request, but does not have the right to insist on compliance.

International Aid Transparency Initiative

Oxfam Novib is committed to publishing detailed financial information each quarter in compliance with the International Aid Transparency Initiative (IATI). Full details of the aims and formation of IATI can be found at the [IATI website](#).

Oxfam Novib began publishing financial data to the IATI Registry in May 2014 in line with [IATI Standards](#). Oxfam Novib will continue to work to make data as transparent and user-friendly as possible. Data on Oxfam Novib's projects and programmes can be accessed in the [IATI Registry](#) or through the web based project browser [ATLAS](#).

Information disclosure restrictions

Oxfam Novib applies the principle of "open, unless...". The most frequent reasons for exclusion from publication are, if publication would:

1) Put the security and safety of staff and other stakeholders at risk

The safety of Oxfam's staff is a primary concern. Oxfam Novib will not disclose any information that might pose a security or safety risk to persons, organizations, its own staff, back-donors or suppliers.

2) Harm operations

Oxfam Novib recognizes the importance of how Oxfam puts principles into practice. But there will be occasions where Oxfam Novib will not disclose information because it considers that the disclosure could harm its work, whether in the Netherlands or in its international operations. An example would be information about a campaign involving particular targets, where the disclosure could jeopardize the effectiveness of the campaign.

3) Breach data protection or other laws and regulations

Title	Open Information Policy
Owner	Board of Directors
Created	04.12.2014
Version	Approved in BoD on 04.12.2014 Page 1 of 3



Oxfam Novib does not publish data where national or international law prevents their publication. Non disclosure may also be part of a cooperation agreement or copyright provision, or other contractual conditions.

4) Affect confidentiality

Information may be confidential because of legal, commercial or contractual reasons, or because its premature disclosure would jeopardize actions that Oxfam Novib is planning to take.

5) Not be cost effective

Where Oxfam Novib considers that the cost of disclosure, whether as a time cost or a monetary cost, would be disproportionate to the request, Oxfam Novib may decline disclosure but will explain that this is the reason.

6) Negatively affect relations of Oxfam Novib or of partner organizations with government(s) or other stakeholders

Oxfam Novib keeps data confidential that might otherwise harm its relations with governments, partners or donors. Oxfam Novib informs partners about its publication policies, and partners can request exclusion. Oxfam Novib is the final decision maker for not publishing part of its data.

7) Jeopardize privacy of staff, partners or other specific persons

Oxfam Novib does not publish information that is traceable to an individual person. For this reason most data related to individual consultants cannot be disclosed.

8) Negatively influence commercial and strategic interests

Oxfam Novib keeps confidential any information that is of commercial interests or strategic interest to Oxfam Novib, partners, suppliers, donors or stakeholders.

9) Affect internal planning, drafts and trivial or ephemeral information

Oxfam Novib will generally not disclose internal working papers that address future plans, or drafts of work, or information which Oxfam Novib considers is of ephemeral interest such that the work involved in disclosure is in Oxfam's view disproportionate.

Decision-making on data confidentiality

All data concerning development assistance projects are published, unless they are marked for exclusion. The managers with authority to sign contracts are also the decision makers on exclusion. Program officers and staff of finance and monitoring departments assist the managers in deciding on exclusions.

Language and translation policy

This Open Information Policy applies primarily to information requests in the English language addressed to Oxfam Novib's offices in the Netherlands. Oxfam Novib's staff in other countries will often respond to relevant requests for information, but time and resource constraints will not always make it practical to respond, whether providing information or giving reasons for not disclosing. Most information is published in the English or Dutch language. However, much information is also published in French, Spanish and Portuguese, and some limited information is also available in other languages. The main barrier to producing more information in other languages is cost.

What use may I make of the information Oxfam Novib discloses?

Most of Oxfam Novib's publications are subject to copyright, but may be reproduced without fee for advocacy, campaigning and non-commercial teaching, but not for resale. Any request to reproduce copyright material (save as permitted under applicable mandatory exceptions to copyright law) should be referred to info@oxfamnovib.nl

How to make a request for information

Requests for information can be made to:

Oxfam Novib
Mauritskade 9
2500 GX Den Haag
info@oxfamnovib.nl

Timescales for response to requests for information and associated costs

Title	Open Information Policy
Owner	Board of Directors
Created	04.12.2014
Version	Approved in BoD on 04.12.2014 Page 2 of 3



Oxfam Novib endeavors to respond promptly, all requests should be responded to within 5 days, unless there is a compelling reason why this is not practical. Costs associated to the request of information are at the expense of the person who made the request.

Multiple requests and requests with no discernible public benefit

Where a person makes multiple requests for information, or Oxfam Novib considers that the work involved in dealing with the request has no discernible public benefit, Oxfam Novib may decide not to spend time in dealing with the request. Such decision will be taken by the Head of the Supporter Services Department, and will be subject to review by the Company Secretary. If any person makes a request in an offensive manner, or has otherwise been abusive to staff or volunteers, then Oxfam Novib may decline to engage in correspondence with that person.

Appeals and complaints mechanism / What if I am unhappy with the way my request has been handled?

You may request a review of any decision under this Policy to withhold information by departments of Oxfam Novib to the Company Secretary of Oxfam Novib. As Oxfam Novib is not a public body, there is no right of appeal to the Information Commission.

If you consider Oxfam Novib is acting inadequately, you may send a complaint to Oxfam Novib. And if you consider Oxfam Novib's reaction to your complain inadequate, you may complain to Partos, the Dutch Association of NGOs working in International Development, whose details are at <https://partos.nl/home/en>

No contractual rights

This policy 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 Oxfam Novib under applicable law.

Who is responsible for the development of this policy?

The day to day aspects of this Policy are the responsibility of the Director of Advocacy and Campaigns.