



ORGANISATIONAL POLICY

IRC OPEN INFORMATION POLICY

Policy Owner: IRC HQ Communications

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Approved by: David Miliband, President and CEO,
International Rescue Committee

PURPOSE:

This policy makes a statement of our commitment to transparency and sets out the information that the International Rescue Committee will make publicly available, both through our website and on request. It also describes the information that we deem necessary to exclude from public review, and outlines our reasoning for these exclusions, with examples to help illustrate our rationale. We have also outlined the processes by which interested parties can request information.

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POLICY:

A. Our Commitment to Transparency

The IRC is committed to acting in a transparent and accountable manner when implementing our programmes and carrying out the activities that support these programmes. We consider these principles to be integral to achieving our mission as an organisation.

Transparency as a Value for the IRC

We believe that being transparent is the foundation for building trust; with our peers, partners, donors, society, the media and, most importantly, our clients and the communities we serve. We consider trust to be an inherent good, and essential for operating as a moral and progressive organisation.

Transparency as a Tool for the IRC

We believe that working in a transparent manner will improve our services. When we are open about our programmes and finances, our stakeholders can see the important work that we undertake, and offer suggestions as to how we might improve. We strive to continually explore new tools and practices that will enable us to develop feedback mechanisms and become more open with our stakeholders.

Transparency as a Goal for the IRC

We believe that the IRC has an important role as a thought leader in transparent working practice, and we aim to set an example for our peers to follow. The IRC aspires to develop evidence-led programmes, and we will learn from the programmes that fail to accomplish their goals as well as those that succeed. Being open and transparent about our work, and sharing learning about programmes, whether the information is neutral, positive or negative, is a key part of our aspiration to be a thought leader.

B. Our Commitment to our Stakeholders

We consider the following groups to be our key stakeholders, and it is to them that we are committed to being transparent:

Our Clients

First and foremost, the IRC is committed to being transparent towards our clients and their communities. The IRC helps people whose lives and livelihoods are shattered by conflict and disaster to survive, recover and gain control of their future, and we refer to the crisis-affected people who receive IRC's assistance as "clients" in order to evoke the agency and power that our work can help them to secure. We commit to further their well-being and act with honour in carrying out the vital humanitarian role that has been entrusted to us. We believe that by being transparent about our work and encouraging our clients to hold us to account, we will improve our programmes and deliver assistance which is more responsive, appropriate and effective in meeting the needs of people affected by crisis.

We recognise that many of our clients are not in a position of review the information in the Open Information Policy, nor do they have the access to technology or the capacity to request other data through the mechanisms described in this policy. However, the IRC has alternative methods for communicating with our clients and receiving their feedback, and the commitments described in this document motivate that work. We invite those of our clients who do have access to this document, or those working on their behalf, to review the information made available, and to request other data that may be of value to them through the information request process outlined below.

Our Regulators

The IRC works with a number of regulators to ensure that our operations and interactions with our stakeholders are fair and legal. The donors (both private and public) and the governments with whom we work (from supranational to local) are some of the regulators that make up the regulatory framework that informs how we fundraise, campaign, employ, and implement programmes. The Open Information Policy refers to a number of policies and guidelines which steer our activities, and we would encourage our regulators to review the information made available in the policy and to request other data that may be of value to them through the appropriate mechanisms described in this policy.

Our Civil Society Partners

Working in partnership with local, national and international civil society organizations is fundamental to the IRC's mission. We are committed to promoting effective partnerships that enable the IRC to pursue its strategic goals, resulting in more effective, responsive and durable assistance that reaches more people. We recognise that transparency is the foundation for trust amongst partners, and we invite our civil society partners to review the information that is made available through the Open Information Policy, and to request other data that may be of value to them through the appropriate mechanisms described in this policy.

Our Funding Partners

The government donors who arbitrate tax payers' money, the private institutions and trusts who donate and the members of the public who support us through individual giving make the work of the IRC possible. We recognise that as we are working with money that is generously offered by our supporters, we have an obligation to act as responsible stewards of those resources and demonstrate the effectiveness of these funds. We are committed to following the regulations and terms established by our institutional donors and private supporters. Our ability to use this funding to serve clients in an efficient and effective way will be made evident through the information that we share. We invite our funding partners to review the information that is made available through the Open Information Policy, and to request other data that may be of value to them through the appropriate mechanisms described in this policy.

Our Host Government Partners

The IRC is a truly global organisation, working in over forty countries around the world. In each instance, we work closely with partners in governing positions, whether at the regional, national, municipal or local community level. Every partnership is important to the IRC, and we see open and transparent practice to be an essential part of building that relationship. We invite our host government partners to review the information that is made available through the Open Information Policy, and to request other data that may be of value to them through the appropriate mechanisms described in this policy.

Our Peers

The IRC acts within a community of organisations, run by hard-working staff and volunteers. We recognise that we not only hold principles and values in common with our peers, but also techniques and practices. We hope that acting in a transparent way and publishing information about our work will lead to a reduction in the duplication and inefficient administration of aid, and we wish to contribute our data as a resource to improve the effectiveness of programmes across the international development and humanitarian sector. We support and encourage our peers to develop their own transparent practices, and invite those in the NGO community to review the information that is made available through the Open Information Policy, and to request other data that may be of value to them through the appropriate mechanisms described in this policy.

Society

The IRC is committed to be a responsible global citizen. Our interactions with governments, regulators, the media and the general public must be grounded in honesty, trust and fair dealing. We support the legitimate

rule of law and will do our part to promote high ethical standards throughout the nations and communities in which we work. We recognise that the work of the IRC has never been more important. The need for our services grow with the numbers of people displaced by conflict and disaster, and these global shifts are occurring at a time when trust in NGOs is declining and anti-migration sentiment is on the rise. The IRC is in an invaluable position as a hub of learning, stories and expertise, and transparency is one of the ways we can be part of the conversation. We encourage all those who are interested in our work to engage with us, review the information that is made available through the Open Information Policy, and to request other data that may be of value to them through the appropriate mechanisms described in this policy.

C. Data Sharing and Our Obligations

The IRC makes a number of resources available for public review. To see these, please look to **Annex 1: Information We Share**. While we endeavour to be transparent and provide information upon request, there are a number of reasons why the IRC would not be able to release some data. The rationale and some examples are offered below, and also in **Annex 2: Exclusions Policy**.

Data protection and privacy

Both IRC-UK and IRC Inc. are 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 charities, neither IRC-UK nor IRC Inc. are public bodies and therefore are not subject to the UK's Freedom of Information Act 2000 or the USA's Freedom of Information Act. However, we are committed to working to increase the openness and availability of the information listed in this policy.

Progressive publication

The IRC is committed to being a transparent organisation, and is keen to learn from all of the opportunities presented by releasing open data and interacting with those interested in our work. However, catering our systems towards the release of data and ensuring that we act as a responsible arbiter of information at the same time requires thought and diligence. We will follow a path of progressive publication; publishing what we can when we can, seeking to release more information in the future, while consistently improving the quality of the data we produce. With this in mind, data that is requested by interested parties may not be available currently, but could be scheduled for public viewing in the future. In these instances, we would decide whether the publication could be moved forward to meet the demand, or if the request should be denied for the time being due to the expected release in the future.

Improvement to our systems

The IRC is continually seeking to improve the way we share and learn from information. The requests sent through to us from the public will help us to review our internal information management systems, and inform better data management practice.

Exclusions Policy

If information is requested from the IRC, we may not be able to provide all the information required. If all or part of the information requested falls under one of our Exclusions categories, we will write to the requester and let them know the reason for which it will not be shared. For information about our Exclusions, please see **Annex 2: Exclusions Policy**. The categories outlined in this document also reflect the guidelines we use for excluding information from our IATI profile. For more information about how information can be requested from the IRC, please see **Annex 3: Information Request Process**.

Annex 1: Information we share

The following is a list of policies and sets of information which we make available to interested parties as part of our efforts to be transparent. We have listed information hosted within our key resources that we believe would be most useful to those reviewing this policy. We encourage our stakeholders to review the documents and learn more about the IRC.

This list is subject to change at IRC's discretion, as we evaluate and consider what information may be made available. The IRC may also share information not included on this list, on request.

A. Organisational Information and Policies

Type of Information	Link to Resource
Strategy	https://www.rescue-uk.org/topic/better-aid https://www.rescue.org/topic/better-aid
<p>Code of Conduct</p> <p>The IRC Code of Conduct outlines organisational best practice for the IRC. Within this document you can find statements which summarise the following:</p> <ul style="list-style-type: none"> • Our Values (pg.2) • Guiding Principles (pg.2) • Our Shared Responsibilities in Upholding This Code (pg.3) • Our Commitments to <ul style="list-style-type: none"> ◦ Our Colleagues (pg.4) ◦ Our Clients (pg.6) ◦ Our Donors (pg.8) ◦ Our Suppliers (pg.10) ◦ Our Partners (pg.12) ◦ Our Organisation (pg.14) ◦ Society (pg.16) • Getting Help (pg.18) <ul style="list-style-type: none"> ◦ How to Spot Ethical Dilemmas (pg18) ◦ Your Duty to Speak Up (pg.18) ◦ Channels for Raising Concerns pg.19) ◦ How to Raise Concerns (pg.20) ◦ Ethical and Compliance Hotline (pg.21) ◦ Anonymity and Confidentiality (pg.21) 	https://www.rescue.org/page/our-code-conduct

Type of Information	Link to Resource
<ul style="list-style-type: none"> ◦ Anti-Retaliation Policy (pg.22) ◦ Responsiveness (pg.22) • Enforcement (pg. 23) 	
<p>Open Information Policy</p> <ul style="list-style-type: none"> • Our commitment to transparency • Process for requesting information • Information that we share • Exclusions policy 	https://www.rescue.org/page/ircs-open-information-policy
<p>Modern Slavery Statement</p>	https://www.rescue-uk.org/sites/default/files/document/1367/modernslavystatement2016.pdf
<p>IRC UK Privacy Policy</p>	https://www.rescue-uk.org/respecting-your-privacy
<p>IRC Inc. Privacy Policy</p>	https://www.rescue.org/respecting-your-privacy
<p>IRC UK Corporate Identifiers</p> <ul style="list-style-type: none"> • Charity no. 1065972 • Company no. 3458056 	<p>For more information, go to:</p> http://beta.charitycommission.gov.uk/charity-details/?regid=1065972&subid=0
<p>IRC Inc. Corporate Identifiers</p> <ul style="list-style-type: none"> • EIN 13-5660870 	https://www.charitynavigator.org/index.cfm?bay=search.irs&ein=135660870

B. Governance

Type of Information	Link to Resource
<p>IRC UK Board of Trustees</p> <ul style="list-style-type: none"> • Name • Position • Biography 	https://www.rescue-uk.org/page/board-trustees
<p>IRC Inc. Board of Directors and Overseers</p> <ul style="list-style-type: none"> • Name 	https://www.rescue.org/board-and-overseers

Type of Information	Link to Resource
<ul style="list-style-type: none"> Position 	
IRC Staff Leaders <ul style="list-style-type: none"> European Senior Management IRC Staff Leadership Board Senior Leaders Group 	https://www.rescue.org/leadership https://www.rescue-uk.org/leadership

C. Finance and Performance

Type of Information	Link to Resource
IRC-UK Annual Report	https://www.rescue-uk.org/sites/default/files/document/1670/ircannualreport2017.pdf
IRC Inc. Annual Report	https://www.rescue.org/financial-information
IRC UK Annual Accounts <ul style="list-style-type: none"> Strategic Report Annual summary of progress against objectives and strategy Statement of financial activities Costs of paying staff across IRC UK Salary levels of highest paid staff <p>The annual accounts include an audit opinion on IRC UK. We will not release audit reports for individual donors.</p>	https://www.rescue-uk.org/sites/default/files/document/1669/irc2017annualreportaw.pdf
IRC Inc. IRS 990 Form <ul style="list-style-type: none"> Statement of revenue Statement of functional expenses Compensation for Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees 	https://www.rescue.org/financial-information

Type of Information	Link to Resource
<p>IRC Inc. Consolidated Financial Statements</p> <p>The annual accounts offer a consolidated audit of the entire organisation. We will not release audit reports for individual donors.</p>	<p>https://www.rescue.org/financial-information</p>
<p>International Aid Transparency Initiative data.</p> <p>We invite those who are interested to look through our IATI data, where they can see details of our projects; how much we spend, what we hope to achieve, and the sectors and countries in which we work.</p> <p>As the IRC-UK and IRC Inc. are separate legal entities, the organisation publishes as two distinct IATI publishers.</p> <p>The IATI Registry links are our IATI profiles. D-Portal offers visualisations of our data.</p> <p>We currently aim to publish data on our projects funded by the UK Department for International Development and the Netherlands Ministry of Foreign Affairs</p> <p>Some of our partners' details will be anonymised, due to the insecure environments in which the IRC works.</p>	<p>IRC-UK:</p> <p>https://iatiregistry.org/publisher/irc_uk</p> <p>IRC Inc.</p> <p>https://iatiregistry.org/publisher/irc_inc</p> <p>IRC-UK:</p> <p>http://d-portal.org/ctrack.html?search&publisher=GB-CHC-1065972#view=main</p> <p>IRC Inc.</p> <p>http://d-portal.org/ctrack.html?search&publisher=US-EIN-13-5660870#view=main</p>
<p>IRC Outcomes and Evidence Framework (OEF)</p> <p>The interactive Outcomes and Evidence Framework is a set of tools developed by the International Rescue Committee (IRC) to guide practitioners in designing the most effective programs using the best available research evidence.</p>	<p>http://oef.rescue.org/#/? k=smuuid</p>

Annex 2: Exclusions Policy

If information is requested from the IRC, we may not be able to provide all the information requested. If all or part of the information requested falls under one of our Exclusions categories, we will write and let the requester know the reason for which it will not be shared. For information about our Exclusions, please see the categories below. For more information about how to request information from the IRC, please see the steps in **Annex 3: Information Request Process**.

The examples provided hereafter are hypothetical; IRC may in its sole discretion grant or deny any information requests, including, but not limited to, for the specific reasons listed below. The Exclusion criteria listed below are subject to change at IRC's discretion.

The categories outlined below also reflect the data we will exclude from our IATI publication.

A. Security: The IRC, by nature of our programmes and the clients we seek to serve, often operates in areas and contexts which are dangerous. Our project mission may be politically contentious or there may be people who are hostile to our presence. This exclusion ensures that the IRC does not publish data which can reasonably be expected to pose a risk to the physical or psychological safety or security of any individuals, members of staff, groups of beneficiaries, partner organizations, donors, host governments or suppliers. This has been agreed in principle between our staff in the UK and New York offices, and data will be excluded on a case-by-case basis under the judgement of our UK, New York and country office staff, and under the consideration for the preferences of our partners and donors.

Example request: What are the names of the schools in Yola, Nigeria, where IRC works to educate women?

Example response: Denied

Reason: This request would be denied based on our decision to exclude information that may put our staff or clients at risk. If this information were made public, it is possible that someone who does not agree with the education and empowerment of women may seek to cause harm to those involved in the programme.

Example request: Who funds IRC's operations in Greece?

Example response: Accepted

Reason: Provided our donors have offered no concerns for sharing their details regarding the countries which are recipients of their funding, we will be able to provide this information. We would either refer to our IATI data or seek to fulfil the request internally.

B. Safeguarding: The IRC is committed to creating a safe environment for its beneficiaries and staff to prevent abuse, exploitation and harassment, minimise risks and take appropriate steps to address incidents. The IRC has strong mechanisms in place to safeguard its clients as well as staff with zero tolerance for abuse, exploitation and harassment. This exclusion ensures that we do not release information which may put our staff, volunteers or clients at risk. This exclusion will have cross-over with, and will include information referred to, in other exclusions listed below, such as Data Protection and Security.

Example request: How many safeguarding cases are under investigation for IRC programmes in Somalia?

Example response: Denied

Reason: At this time the IRC does not provide information on investigations except to its donors.

Example request: Who is responsible for investigating safeguarding cases at the IRC?

Example response: Accepted

Reason: This request would be accepted, as we would be able to provide information about our Ethics and Compliance Unit and some overview information about how investigations are conducted.

C. Ongoing Investigations: The IRC's Ethics and Compliance Unit (ECU) drives a culture of integrity, prevention, risk mitigation, and compliance throughout the organisation. The ECU is responsible for investigating any allegations of misconduct that potentially violate IRC's Code of Conduct or the law. If an investigation is underway, the IRC will not release any information as that may jeopardise the investigation, put those involved at risk, or cause undue harm to the IRC. Once completed, investigation outcomes are shared only with donors.

Example: Ongoing Investigation request: We are aware that the IRC is investigating allegations of fraud in Country X, and request a description of the alleged misconduct and when you expect to complete your review?

Example response: Denied

Reason: At this time the IRC does not provide information on investigations except to its donors.

Example: Historical Investigation request: How many cases of fraud and corruption did IRC investigate in 2018?

Example response: Denied

Reason: At this time the IRC does not provide information on investigations except to its donors.

D. Fraud: The IRC has zero tolerance for fraud and corruption and investigates all allegations. IRC's anti-fraud and anti-corruption program is dedicated to ensuring that donor funds are used for their intended purposes – the welfare of our clients. This exclusion will ensure that we do not publish information which could increase the likelihood of future fraud, hamper fraud investigations, breach the confidentiality of those involved in investigations (including our donors), violate the laws of the countries where we do business, or threaten the security of staff.

Example request: Did you terminate X staff person for fraud or cease relations with Y company for fraud?

Example response: Denied

Reason: We cannot comment on specific personnel actions or provide specific information about the reasoning behind our business relationships.

Example request: How many incidents of fraud did you have in 2018?

Example response: Approved

Reason: This is general information that will not compromise our operations.

E. Data Protection: The IRC considers the protection of privacy to be extremely important. Our programs operate on a basis of mutual trust between our clients, staff and donors. This exclusion ensures that we will not publish information where disclosure would breach data protection legislation or an individuals' right to privacy. This may include, but is not exclusive to, photos, names, personal information that is traceable to an individual person and can reasonably be judged as an infringement on the privacy of that person, or any information that has been entrusted to us on an explicitly confidential basis.

We are also mindful of releasing datasets which contain multiple data points which could be combined to create personally identifying data. A person's identity can be disclosed from direct identifiers such as names, addresses, postcode information, telephone numbers or pictures, or indirect identifiers which, when linked with other publicly available information sources, could identify someone, e.g. information on workplace, occupation or exceptional values of characteristics like salary or age. We will not share data which reveals the personal details of our staff, volunteers, beneficiaries or individual supporters, without their consent. This consent will ideally have been provided in writing. In the case of data requested within the remit of the GDPR, consent must be provided in writing.

The IRC will meet the standards set by the General Data Protection Regulation (GDPR), and subscribes to the GDPR definition of personal data, which means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.

Personal data that has been pseudonymised – e.g. key-coded – can fall within the scope of the GDPR depending on how difficult it is to attribute the pseudonym to a particular individual.

Here, we offer the Health Insurance Portability and Accountability Act (HIPAA) definition of protected data to illustrate these identifying data points:

- Names
- Geographic subdivisions smaller than a State, including street address, city, county, precinct, zip code, and their equivalent geocodes
- All elements of dates (except year) for dates related to an individual, including birth date, admission date, discharge date, date of death, etc.
- Telephone numbers
- Fax numbers
- Email addresses
- Social security numbers
- Health plan beneficiary numbers
- Account numbers
- Certificate/license numbers
- Vehicle identifiers and serial numbers
- Device identifiers and serial numbers
- Web URLs
- IP addresses
- Biometric identifiers, including finger and voice prints
- Photographic images
- Any other unique identifying number,

- Medical record numbers characteristic, or code

The IRC is also beholden to observe the PRM (Bureau of Population, Refugees and Migration) guidelines on sharing Refugee Records, Data, and Information for Research Purposes. We will not carry out field research with refugee biodata and other information originating from the overseas database (WRAPS), and refugee records, data, and information will only be shared with research partners with prior approval from PRM, and on a case-by-case basis.

Example request: I would like the raw data from research conducted for the Airbel project on Early Childhood Development in Syria. This is for my masters in child psychology.

Example response: Denied

Reason: This request would be denied as raw datasets have not been anonymised, and this compromises the privacy of our clients. Even if a dataset has been anonymised, a great deal of care must be taken to ensure that data cannot be traced back to an individual.

Example request: Who is on the board of trustees for IRC?

Example response: Accepted

Reason: Our trustees have consented to making their names public, and they recognise this is a key feature of a transparent organisation.

F. Privacy and Confidentiality: The IRC is a world leader in humanitarian and development operations, and we aim to share our knowledge and learn from our peers for the advancement of the sector. We recognise that this position is dependent on the ability of our staff to make executive decisions in a confidential working space, without fear of undue reprisals. We also wish to protect our capacity to compete for contracts in our area of expertise, and to make the most of learning from projects in which we have invested significant staff time and funding. This exclusion will ensure that we do not publish information which hinders staff ability to do their job, contradicts commercial confidentiality, undermines our application for commercial contracts or prevents the IRC from learning from research, and securing a return on investment, before sharing the data with the wider community.

Example request: How much does IRC charge for project management costs for DfID's commercial contracts.

Example response: Denied

Reason: This request would be denied as this kind of information is crucial to winning contracts for IRC, and enabling us to continue our work.

Example request: How much money had IRC spent in South Sudan in Financial Year 2016?

Example response: Accepted

Reason: This request would be accepted as there is no commercial advantage to withholding the data.

G. Legal/Contractual and Copyright: The IRC conducts its operations in strict legal conditions, and this exclusion is in place to ensure we do not publish data for which we do not have the right to publish, or if contractual agreements with donors or partner organisations impede the IRC's right to publish the data. Additionally, any information on which another organisation owns the copyright or intellectual property rights, will not be published without permission. Similarly, the IRC will not publish information that is not our right to disclose. This is outside of the scope of this policy and we will ask you to contact the other organisation directly.

Example request: How many Plan International UK staff worked on the consortium project between IRC and Plan for supporting marginalised girls in Sierra Leone?

Example response: Denied

Reason: This request would be denied as it is not our obligation to share this information. In this instance, the interested party would be directed towards Plan International UK.

Example request: What are the IRC's theories of change for helping to improve water access and sanitation?

Example response: Accepted

Reason: This request would be accepted as the IRC has publicly released our Outcomes and Evidence Framework which details out theories of change.

H. Cost/Staff Time: The IRC works hard to bring world class programmes to displaced peoples around the world. While we endeavour to be transparent in our operations, we need to balance our commitment to transparency with our delivery of results, and our responsibility in distributing taxpayer's money and philanthropic gifts. This exclusion will ensure that IRC staff do not publish information when the financial or time cost of disclosing the information would be unreasonably high.

Example request: How many staff worked in the IRC Balkans office in 2003?

Example response: Denied

Reason: This request would be denied as the IRC was not gathering or publishing this kind of information at this point, and it would cost an unreasonable amount of money to identify the answer.

We will not pursue a request such as this if we do not feel that the resulting information has a strong value to the wider community.

Example request: How many staff worked for IRC-UK in 2015?

Example response: Accepted

Reason: This request would be accepted as there is sufficient data available and the costs would not be excessive for the IRC.

I. Status: IRC-UK will not publish information which is in draft state for staff review only, is an internal communication or an internal administrative or management document. Information that is released in a draft state may be inaccurate and thus offer a misrepresentative image of the organisation, or may contradict commercial confidentiality.

Example request: What is the aggregate figure for the grants that IRC is currently negotiating with Sida?

Example response: Denied

Reason: This request would be denied as the figure will likely change due to the nature of grant negotiations. It would be misrepresentative to offer a figure such as this, while the amounts are still being determined. In this instance, the interested party would need to wait until the project was in implementation and the amounts had been decided.

Example request: What is the aggregate figure for IRC's active grants that are funded by Sida?

Example response: Accepted

Reason: This request would be accepted as the budget amounts will have been agreed and signed between IRC and the donor.

J. Offensive or Unreasonable Requests: The IRC may decline to correspond if a person deliberately behaves in an offensive or abusive manner, aims to obtain information by deceit (for example by using false contact details or other misrepresentation) or otherwise engages in unreasonable conduct.

K. Historical Information: The IRC was founded in 1933. Since that time we have been working to improve the lives of those who have been displaced by conflict and crises, and have engaged in many different programmes across the globe. This exclusion guides IRC staff in deciding whether or not to

publish information that is historical, as it may be difficult and costly for the IRC to obtain, such as archived material.

Example request: What were the board agendas from 1980 – 1985?

Example response: Denied

Reason: This request would be denied on the basis that the information would be difficult to source, and may not exist at the end of the inquiry. If the information were to exist, then decisions would need to be made on whether the data could be released, as the data may have been collected under different expectations of transparency.

Example request: Can I have access to the annual reports for the IRC from 1990 – 1995?

Example response: Accepted

Reason: This request would be accepted as the information will almost certainly be available to staff, despite being historical data.

L. Synthesis of Data: IRC programmes extend from advocacy in donor countries to providing basic education in refugee camps, in countries all over the world. The data collection sources are varied and sit across multiple systems. While we recognise the value of bringing this data together, and also of combining it with the wealth of datasets that exist elsewhere, this exclusion states that the IRC is under no obligation to perform analysis or synthesis of separate datasets, of either our own data or that of our peers. If information is available from a single data source, we will also direct the requester to the source of data, rather than extracting the information ourselves.

Example request: How has the cost-per-client ratio changed in IRC's projects in Sierra Leone since 1999 in comparison to Oxfam?

Example response: Denied

Reason: This request would be denied as determining a cost-per-client ratio requires analysis and synthesis of multiple datasets, and to provide a time-dependent cost comparison would also require factoring in inflation and the data from our peers (also issue of access to Oxfam's dataset).

Example request: How much did IRC spend in Sierra Leone in Financial Year 2015?

Example response: Accepted

Reason: This request would be accepted as the information is available to IRC staff. The requester may decide to make multiple requests over a reasonable period of time and complete the analysis and synthesis of data independently of the IRC.

Annex 3: Information Request Process

Those who wish to request information from the IRC, can do so following the process below:

1. Refer to the Open Information Policy and check the linked resources for the information that you desire.
2. If you have been unable to identify the information you wish to locate, email a request to inforequest@rescue.org.
3. Complete your information request, and please ensure you include the following:
 - Your contact details
 - A clear description of the information that you want, with as much detail as possible.
 - The reason why you are requesting this information. This will help us to direct your query, and to learn what kind of information is useful to those outside of the IRC.
4. You will receive a notification confirming the receipt of your request, and your request will be assigned a ticket number.
5. Our staff will then endeavour to answer your query within **thirty calendar days**. Some requests may take more time than others, in which case we will contact you with an update and an estimated response time.
6. Your request may be rejected if it contradicts one or more of our Exclusions. If this happens, you will be given the reason for the rejection.