

# **LAUGHTER AFRICA'S OPEN INFORMATION POLICY**

## OUR COMMITMENT TO TRANSPARENCY

Accountability at Laughter Africa means taking responsibility for listening to the needs, concerns and views of our key stakeholders. This includes our supporters, donors, beneficiaries, staff, volunteers and, above all, the communities that we serve. It means taking into consideration what they are telling us and being answerable to them for the decisions that we make.

Laughter Africa believes that timely, free-flowing information which is accessible and appropriate to the context is essential for ensuring accountability to our key stakeholders. As such, accountability and transparency are identified as strategic priorities for Laughter Africa.

Our accountability commitments are underpinned by principles including respect for the dignity of all people, encouraging participation and engaging in 'right' relationships, with an emphasis on facilitating a shift in power towards those with the least power and influence. Information sharing is central to each of these core principles which guide the way we work at Laughter Africa.

We also recognise that there are costs involved in setting-up and managing the open availability of information and, in the light of our commitment to good stewardship, these costs will be taken into account when deciding the publication of such information.

Laughter Africa's definition of transparency is in line with One World Trust's definition and emphasises both the active sharing of information and enabling our key stakeholders to hold us to account:

*"Transparency is the provision of accessible and timely information to key stakeholders and the opening up of organisational procedures, structures and processes to their assessment" (Global Accountability Project, One World Trust).*

This policy outlines our approach to sharing information with our key stakeholders including what information is available, how it is shared and how we open up our organisation to external assessment.

## HOW CAN I ACCESS LAUGHTER AFRICA INFORMATION?

Publically available information can be accessed quickly and easily via our website [www.laughterafrica.org.uk](http://www.laughterafrica.org.uk) or on request at [info@laughterafrica.org.uk](mailto:info@laughterafrica.org.uk). You could also phone the Laughter Africa team on 0151 645 7322 or write to: Laughter Africa, 124 Princes Boulevard, Bebington, Wirral, CH63 5LP

We consider requests for large text documents on a discretionary basis. However, we do not provide documents in Braille, due to the limited volume of demand to justify the cost.

We will reply to requests as soon as possible. Normally, within 5 working days a Laughter Africa representative will have responded, either with the requested information or an explanation as to why it cannot be provided. Response will take no longer than 30 working days.

We reserve the right to ask the reason for the information request.

## WHAT USE MAY I MAKE OF THE INFORMATION LAUGHTER AFRICA DISCLOSES?

Laughter Africa information, publications and materials 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 the Director.

## WHAT INFORMATION DOES LAUGHTER AFRICA SHARE FREE AND OPENLY?

Listed below are the main areas of information that can be accessed via our website or on request:

- **General information:** our vision for change, how and where we work, our standards and commitments, our organisational profile and structure, our Trustees, remuneration of Trustees, staff numbers and salary information.
- **Organisational policies:** HR policies, finance policies, international department policies, supporter services policies.
- **Strategies and plans:** our strategic plan, the difference we make to all our key stakeholders and our planned activities for the next three years.
- **International project information:** details of all live projects and case study examples of our international work.
- **Finances and performance:** our Trustee's report and financial statements and major programme evaluations.

For a full list of published documents, please refer to Appendix 1.

## IN WHAT WAYS IS LAUGHTER AFRICA OPEN TO EXTERNAL ASSESSMENT?

As part of our ongoing move to improve our accountability to all key stakeholders, Laughter Africa encourages our key stakeholders to contribute their opinions, suggestions, concerns and complaints. We have procedures in place for handling feedback and complaints and ensuring organisational learning.

Laughter Africa promotes and commissions regular programme evaluations to help understand the difference that our work is making to the communities we serve and help us improve our work in the future. Summaries of major programme evaluations are published on our website.

## WHAT INFORMATION DOES LAUGHTER AFRICA SHARE LOCALLY?

We encourage our country offices to make information about Laughter Africa and our projects available to the communities and beneficiaries we support, taking consideration of the security of both our staff and the communities themselves. When presenting information, we encourage country offices to do so in languages and media accessible to local people.

## WHAT INFORMATION IS NOT SHARED?

We do not share all information but aim to be transparent about what information is not shared. The most frequent reasons for not sharing information are:

- **Security:** The safety of our staff is a primary concern. We will not disclose information where we consider it could jeopardise our ability to operate, the safety of our staff or the security

of our assets. Nor will we disclose information if it may have a negative impact on the communities that we serve.

- **Confidential Information:** Information may not be shared because of legal, copyright, data protection, partner confidentiality, commercial or contractual reasons, or because it's premature disclosure would jeopardise action that Laughter Africa is planning to take or compromise fundraising competitiveness.
- **Cost:** Where we consider that the cost of disclosure, whether as a time or money cost, would be disproportionate to the request, we may decline disclosure.
- **Vexatious requests:** Where in our opinion a person is making repeat requests for information, we may consider that the request is vexatious, in which case we may decide not to spend time in dealing with the request. Such decision will be taken by the Director. The Director will report annually to Trustees on the number of requesters deemed to be vexatious.
- **Privacy:** disclosure would breach data protection legislation or an individuals' right to privacy. For example, we will not share the personal details of our people or supporters;
- **Copyright:** copyright in the material belongs to someone else and we cannot give permission for its use;
- distract our people from the delivery of crucial programme objectives;
- **Irrelevance:** the request for information has, in our judgement, no discernible public benefit or is of essentially ephemeral interest. This may include internal administrative documents or draft documents;
- **Offensive or Unreasonable Requests:** we may decline to correspond if a person behaves in an offensive or abusive manner, or engages in unreasonable conduct;
- **Harm to operations:** We recognise the importance of how we put principles into practice. But there will be occasions where we do not disclose information because we consider that the disclosure could harm our work, whether in UK or in our international operations.
- Legal advice and matters in dispute or under negotiation

Appendix 2 provides specific details of information and documents that we do not publish.

## POLICIES THAT INFORM WHAT INFORMATION LAUGHTER AFRICA SHARES AND HOW?

The following policies and guidance have informed our open information policy:

- **EU General Data Protection Regulation (GDPR):** The GDPR covers the storage and public sharing of personal information and an individual's right to know what information an organisation holds about them. In the light of GDPR, Laughter Africa is committed to ensuring that not only are the legal data protection requirements met but also that a culture of good practice is established in the processing of personal data. This includes storing minimal data on under 18s and staff requiring special clearance to access this data.
- **Freedom of Information legislation:** Laughter Africa is registered as a charity in the United Kingdom. It is not a public body and so is not subject to the United Kingdom Freedom of Information Act 2000. Nevertheless, in framing this policy we have had regard to the policy aims behind the Freedom of Information Act, and our general approach is in keeping with the Act's assumption that information should be disclosed unless there is a good public policy reason for withholding it; it compromises Laughter Africa's security or confidentiality;

or the cost of disclosure would be disproportionate (please refer to the previous section in this document).

## HOW IS INFORMATION SHARED INTERNALLY WITHIN LAUGHTER AFRICA?

Within Laughter Africa we hold two key principles of information sharing:

1. Information is made available to the whole organisation unless there is a good reason to store it privately.
2. In the case that information will be shared publicly (i.e. with people and entities external to Laughter Africa, including beneficiaries), notification must be given to the Laughter Africa contact person for the document. This is to ensure the information within the document is up to date and suitable for publishing externally. All documents should be attributed to a contact person.

## APPEALS AND COMPLAINTS

You may request a review of any decision under this Policy to withhold information by UK or international departments of Laughter Africa by contacting:

- [info@laughterafrica.org.uk](mailto:info@laughterafrica.org.uk)– if you are a Laughter Africa supporter or member of the general public
- The Director of Laughter Africa – if you are a member of staff, project beneficiary or project stakeholder.

If, after contacting us, you would like to take matters further you may wish to contact the Information Commissioner's Office at [www.ico.gov.uk/complaints](http://www.ico.gov.uk/complaints) in the event that you are unhappy with the way we have collected or used information about you (your personal information). If you consider Laughter Africa is acting illegally, you may complain to the Charity Commission of England and Wales via their online complaints form available at [www.charitycommission.gov.uk](http://www.charitycommission.gov.uk) or in writing to The Large Charities Unit, Charity Commission (PO Box 1227, Liverpool, L69 3UG).

## 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 Laughter Africa under applicable law.

## APPENDIX 1-DOCUMENTS LIST

The following provides a full list of documents you can access via our website [www.laughterafrica.org.uk](http://www.laughterafrica.org.uk) or on request at [info@laughterafrica.org.uk](mailto:info@laughterafrica.org.uk)

### General information about Laughter Africa

Document	Available from	Language/s
About us – where we work, what we do, how we work	Website	English
A brief history of our work	Website	English
Project Information and case studies	Website	English
Laughter Africa’s organisational profile	Website	English
Laughter Africa’s organisation chart	Website	English
Trustees, remuneration of Trustees, staff numbers and salaries (within the Trustees’ Report and Financial Statements)	Website	English
Laughter Africa’s vision, mission and values	Website	English
Laughter Africa’s statement of accountability	Website	English

### Organisational policies

Data Protection Policy now updated to comply with the GDPR ) and privacy policy.	On request	English
Dignity, Diversity and Equality Policy	On request	English
HIV Workplace Policy	On request	English
Bullying and Harassment Policy	On request	English
Grievance Policy	On request	English
Whistle blowing Policy	On request	English
Staff Code of Behaviour	On request	English
Disciplinary policy	On request	English
Environmental Policy	On request	English
Reserves and investment policy	On request	English
Evaluation Policy	On request	English
Complaints Handling Policy and Procedures	On request	English
Safeguarding Children Policy	On request	English
Position statement on vulnerability and inequality	On request	English
Communications about children policy	On request	English
Anti- bribery policy	On request	English
Fraud and loss policy	On request	English
Acceptance of donations policy	On request	English
Policy on safeguarding resources from terrorist abuse	On request	English
Security policy	On request	English
Security manual	On request	English
Risk management policy	On request	English
Trustee Induction policy	On request	English
End of contract policy	On request	English
Capability Procedures	On request	English
Redundancy policy	On request	English
Probation policy	On request	English
Acceptance of gifts and hospitality	On request	English
Conflict of interest policy	On request	English

Credit card policy	On request	English
Authorisation of expenditure policy	On request	English
Payment of expenses policy	On request	English
Internal financial controls policy	On request	English
Volunteer policy	On request	English
Health and Safety policy	On request	English
Gender policy	On request	English
Laughter Africa's Accountancy manual	On request	English
Security manual version 2	On request	English
Laughter Africa's volunteer handbook	On request	English
Laughter Africa's vehicle policy	On request	English
Laughter Africa's working time & office hours	On request	English
Laughter Africa's retirement policy	On request	English
Laughter Africa's flexible working policy	On request	English
Laughter Africa's maternity policy	On request	English
Laughter Africa's paternity policy	On request	English
Laughter Africa's annual leave policy	On request	English
Laughter Africa's sickness and absence policy	On request	English
Laughter Africa's adoption policy	On request	English
Laughter Africa's time off for personal reasons policy	On request	English
Laughter Africa's Earmarking policy	On request	English
Laughter Africa's safer recruitment statement	On request	English
Open Information Policy	On request	English
Foreign currency and exchange rate policy	On request	English
Laughter Africa's Paying staff policy	On request	English
Sierra Leone Financial procedures	On request	English
Laughter Africa's human resources policy for all staff working in Sierra Leone (This includes our grievance policy, disciplinary policy, probation policy, redundancy policy, maternity leave, paternity leave, annual leave policy, sick leave policies in accordance with local Sierra Leonean law etc..)	On request	English
National staff job descriptions and contracts	On Request	English
Trustee Job Descriptions	On request	English
Register of Trustees	On request	English
Trustee declaration of interests forms	On request	English
Health and Safety Risk Assessment	On request	English
Trustee Declaration Forms	On request	English

### **Strategies and plans**

Supply Chain Manual	On request	English
---------------------	------------	---------

### **Finances and performance**

Trustees' Report and Financial Statements	Website	English
---	---------	---------

## APPENDIX 2-INFORMATION EXCLUSIONS

Laughter Africa does not publish the following information for the reason stated.

<b>Information / documentation</b>	<b>Reason for not publishing</b>
Personal details of staff: addresses, family details, income, property, sexual orientation, illness and similar information	Data protection
Personal details of supporters	Data protection
Project information for confidential projects	Usually security implications
Project budgets	Cost – this information is not captured in an extractable format
Security country plans	Security implications