

Information Disclosure Policy

Introduction

Transparency International Bangladesh (TIB) is an independent, non-government, non-partisan and non-profit organization with a *vision* of Bangladesh in which government, politics, business, civil society and the daily lives of the citizens shall be free from corruption. TIB is the accredited national chapter in Bangladesh of the Berlin-based Transparency International. TIB's *mission* is to catalyse and strengthen a participatory social movement to promote and develop institutions, laws and practices for combating corruption in Bangladesh and establishing an efficient and transparent system of governance, politics and business.

Guiding Principles

2. TIB believes that access to information is indispensable for transparent decision-making, to empower people and institutions to prevent and fight corruption and promote good governance. TIB's work is based on the principles of transparency, accountability, integrity, solidarity, courage, justice and democracy. Accordingly, TIB is committed to:

- i. be open, honest and accountable in its relationships with everyone it works with and with each other;
- ii. provide accurate and timely reports of its activities to its stakeholders; and
- iii. comply with the Right to Information Act 2009 and Whistleblower Protection Act 2012;
- iv. report, publish and disclose information at its disposal proactively and periodically via its website www.ti-bangladesh.org and other possible and practical means meeting best possible national and international standards;
- v. provide information at its disposal to any individual upon request in the due process by relevant and applicable means;
- vi. disclose, publish and report all information subject to specific exceptions as outlined further below in this policy.

3. The Disclosure Policy of TIB (hereinafter disclosure policy) is based on the above principles and relates to TIB public disclosure of information at its disposal.

Scope & Limitation

4. This Policy covers all information that is held by TIB in its premises and on the servers that it uses, and outlines the criteria and processes determining public disclosure of such information.

5. Information pertaining exclusively to the activities of third parties with whom TIB may cooperate, partner, network and interact in any other manner remains property of those third parties and are not in the jurisdiction of this policy.

Proactive disclosure

6. TIB is committed to disclosing information including such documents as listed as Annex I. This list will be regularly reviewed. In some cases a document, or a part thereof, otherwise subject to routine publication may fall within the scope of the regime of exceptions.

Disclosure on request

a) Request Process

7. Anyone may request information from TIB in writing with explicit reference to this policy by email (info@ti-bangladesh.org), fax (+880-2-9124915) or by conventional mail (TIB, MIDAS Centre (4th & 5th Floors), House-5, Road-16 (New) 27 (Old), Dhanmondi, Dhaka -1209).

8. Request for information can be sent to: Designated Officer, Resource Centre, Transparency International Bangladesh, MIDAS Centre (4th & 5th Floors), House-5, Road-16 (New) 27 (Old), Dhanmondi, Dhaka -1209, e-mail: info@ti-bangladesh.org. Information can also be sought from Designated Officers in all offices of TIB outside Dhaka, contact details of which are disclosed by website www.ti-bangladesh.org

9. In case a request is not clear, Designated Officer or any other TIB staff member will ask for further clarification and, where necessary, provide assistance to a requester in formulating his or her request.

b) Time limit

10. TIB will respond within 15 working days from the date of the receipt of a request, with a 15 days extension if the regime of exception has to be considered.

c) Designated Officers

11. Designated Officers are assigned by the Executive Director to ensure due implementation of this Policy. There will always be as many Designated Officers as the number of TIB offices. On the date of adoption of this policy there are 46 Designated Officers in TIB: one in the head office in Dhaka and one each in each of the 45 TIB offices set up in the district and upazila levels where civic engagement programmes are implemented through Committees of Concerned Citizens (CCC), Youth Engagement and Support (YES), Shocchotar Jonno Nagorik – Shojon (Citizens for Transparency) and YES Friends. Designated Officers receive requests for information, respond and provide information in conformity with this policy.

12. The Designated Officers will submit to the Executive Director on a yearly basis a report on the implementation of this Policy including a register of formal information requests and TIB's responses. Designated Officers may also advise the Executive Director about potential review of the policy.

d) Forms of communicating information on request

13. TIB is committed to honour requests for information in any form (usually electronic or print) in Bangla and/or English language in which the information is held in TIB, or can generate such information through an automated process (e.g., printing out from a database or an electronic document).

e) Information seeker needing special assistance

14. Where the information seeker needs special assistance including persons with disability, the Designated Officer will make special effort to assist him/her to access the relevant information in relevant and available form.

f) Process of handling requests

15. Designated Officer(s) will seek support and cooperation from relevant members of the staff in order to reply to the requester. In case a denial is applicable this should be confirmed by the Executive Director/Deputy Executive Director. Any reply denying disclosure of information shall outline the reasons for denial with reference to this policy. The Designated Officer(s) will keep register(s) of requests for information and of TIB's responses.

g) Charges

16. TIB will not charge any fees to process requests which it will provide via email. No fees will also be charged for upto 100 pages of copied or printed documents. For copying documents of more than 100 pages or other costs like postage/parcel/courier TIB may charge fees to cover actual costs with receipts. If TIB provides a document for sale, the relevant price may be charged. In all cases where charges will be applicable the requester will be informed in advance about any costs.

Exceptions

17. In conformity with national and international best practices and standards, TIB's commitment to the principle of maximum disclosure recognises the following legitimate grounds for not disclosing information: a) protection of privacy, b) confidentiality, c) legal privilege, d) protection of individuals providing data/information for research and e) TIB's ability to operate effectively.

a) Protection of privacy

18. TIB will not disclose personal information of members of the Board, staff, members, CCC, YES, Shojon, YES friends and of any other natural third party involved with TIB which would breach his or her privacy or a legitimate private interest unless that person has consented or the information was provided on the clear understanding that it might be made public.

b) Confidentiality

19. TIB will not disclose information in case such disclosure may constitute an actionable breach of confidence or a related commitment or legal obligation, or would put the safety of members of TIB Board, staff, members, CCC, YES, Shojon, YES friends and of any other natural third party involved with TIB.

c) Legal privilege

20. TIB will not disclose information which is privileged from production in legal proceedings unless the person who is entitled to the privilege waives it. TIB will waive its own legal privilege unless to do so would put it at a disadvantage in legal proceedings or breach one of the other exceptions in this policy.

d) Protection of individuals providing data/information for research

21. In conformity with national and international practice, TIB will not disclose identity of respondents, informants, experts or other individuals or institutions who may provide data, information or opinion in connection with research, surveys or any other type of studies conducted by TIB. TIB will not disclose incomplete or draft research report or documents related to on-going research and raw data of unpublished research.

e) Ability to operate effectively

22. TIB will not disclose information where to do so would damage its ability to operate effectively, harm its relations with a third party, or inhibit healthy functioning of the organisation or put the safety of anyone involved with TIB at risk.

23. In addition, TIB will not respond to vexatious requests. A request may be vexatious if it:

- a) seeks information of a frivolous nature,
- b) is likely to cause distress or irritation without justification; and/or
- c) aims at disrupting TIB's work or harassing its staff members.

Appeals

24. Anyone who believes that a TIB Designated Officer or any other staff member has failed to properly apply this Policy to their request for information may appeal to the Executive Director. Any such appeal shall be decided within 30 days. If after that appeal, the requester still believes that this policy was not properly applied, the requester can further appeal to the Ombudsman of the TIB Board. Any such appeal shall be decided within 60 working days.

Effective Date & Amendment

25. This Information Disclosure Policy is adopted on July 17, 2014, and shall be in force with immediate effect, provided that the same or any part thereof may be altered, modified, omitted or added to from time to time.

Annex:

The following categories of information and documents are among those available on the TIB website (www.ti-bangladesh.org).

1. Organizational introduction including vision and mission statement
2. Governance Manual
3. Code of Ethics
4. Annual reports
5. Budget, audited accounts and source of funding
6. Organisational Structure
7. Current list of Board Members
8. Register of interests
9. Board & Staff Directory with business contact information
10. Information Disclosure Policy
11. Procurement Policy
12. Operations Policy
13. Human Resources Policy
14. Gender Policy
15. Internship Policy
16. Fellowship Policy
17. Partnership Policy
18. Current Job Announcements
19. Newsletters and other regular publications
20. Published research reports
21. Programme and Project Information
22. Publications
23. Press releases & media statement