

Norwegian Refugee Council

Open Information Policy and guidelines

“Transparency is a characteristic of governments, companies, organisations and individuals that are open in the clear disclosure of information, rules, plans, processes and actions.”

Source: Transparency International

Transparency is a prerequisite for accountability

Norwegian Refugee Council (NRC) is committed to being accountable to all stakeholders – the people we serve, staff, host authorities and donors, as well as the general public. Transparency is a prerequisite for accountability.

This policy outlines what information we share and how we do it. The policy is based on the premise that all information will be publicly disclosed.

Non-disclosure must be based on well-founded and predefined reasons – such as the safety of our staff, the privacy of people we serve, our ability to deliver aid, the integrity of our organisation, or if it harms our financial interests. Thus, this policy also outlines what information we do not share, and why.

It is the expressed aim of our Board of Directors and Senior Management Group that transparency should be at the core of the organisation’s mission to promote and protect the rights of people affected by displacement. We strive towards the highest standards of openness.

NRC recognises that making information available is not sufficient to achieve transparency. The publication of large amounts of raw information may breed opacity rather than transparency.

Information must therefore be accurate and presented in a way that makes it easily accessible and comprehensible for all stakeholders. Information must also be relevant and timely, that is, it must be made available with sufficient time to permit analysis, evaluation and engagement by stakeholders.

Scope, implementation and responsibility

The Open Information Policy constitutes our normative framework and applies to all departments and countries where NRC has offices and programmes.

NRC commits to distributing the policy throughout the organisation and ensuring adherence at all levels.

The External Relations Department has the overall responsibility for the Open Information Policy. The Department is also responsible for distribution, for building awareness and for clarifying roles and responsibilities.

Line Managers must ensure implementation of the policy in their unit.

Staff will be introduced to the policy during their induction training.

NRC's Risk management section will monitor compliance with the policy.

The ICT Department provides necessary technical support.

The policy is publicly available through the NRC website – www.nrc.no

NRC – a Norwegian organisation

NRC is a Norwegian organisation and operates within a framework that sets high standards regarding openness and transparency. The Norwegian Constitution, National Archives Act and national record-keeping standard, and the Freedom of Information Act constitute the regulatory framework.

Although the regulatory framework is only applicable to public authorities, civil society in Norway is expected to strive towards the same ideals and standards. The regulatory framework and the way information is made accessible to the public by the Norwegian Government serves as our benchmark.

Compliance with reporting mechanisms and standards

NRC is committed to publishing information in compliance with national and international reporting mechanisms and standards, aimed at increasing aid transparency.

NRC publishes information through IATI on a quarterly basis.

This information is available on the [IATI website](#), as well as the [NRC website](#), along with a copy of NRC's implementation schedule, which outlines the organisation's plans to enhance the scope of the information it routinely makes publicly available.

NRC complies with the reporting requirements of its funding partners and key stakeholders by producing regular project reports, which outline progress towards agreed objectives. In addition, all project expenditure is subject to external audit.

As a Norwegian organisation, NRC submits reports and information to Norwegian authorities, as required under Norwegian law.

NRC is registered in the Norwegian Fundraising Registry (Innsamlingsregisteret) –

administered by The Norwegian Control Committee for Fundraising (Innsamlingsrådet). Organisations that sign up commit to specified fundraising standards and are monitored regularly.

NRC staff, partners or suppliers processing personal data on behalf of NRC must do this in accordance with the EU Data Protection Directive 95/46 and data protection legislation in the country where the data processing takes place. When EU and local legislation conflicts, NRC shall always comply with the strictest regulation.

What we share

These are the main categories of documentation, which are accessible through our website or upon request:

- **Overarching, governing documents** – such as policy papers.
- **Organisational chart and role mandates, including key contact details**
- **Programme information** – core competencies and information about what programmes we run in which countries.
- **Financial information** – yearly financial statements (activity accounts) and related audit report, annual reports to the Norwegian government and quarterly reports to IATI
- **Overview of NRC's major donors**
- **Selected Strategies and Plans of Action** – such as the Global Strategy
- **Selected contracts, Partnership Agreements and Memorandums of Understanding** – upon request
- **External evaluations**
- **General information on closed misconduct cases.**

Please consult appendix 1 for a more detailed list of categories of documents shared by NRC.

What we do not share

These are the main categories of documents, which we do not share:

- **Personal information about our staff**

Personally identifiable information about people we serve, unless an individual has explicitly given us permission to do so. Even where permission is given, we always assess whether sharing identifiable information could threaten the safety of that individual, their community, NRC staff, or other parties involved.

- **Technical and thematic procedures, handbooks, standards and position papers** – such as documents concerning security, internal audits or logistical information.
- **Most Strategies and Plans of Action** – such as branding and financial strategies or Annual Plans of Action.
- **Selected contracts, Partnership Agreements and Memorandums of Understanding** – when there is a non-disclosure clause or when disclosure will harm our financial interests or may entail safety and security risks.
- **Documents for internal learning** – such as internal reviews

Please consult appendix 2 for a more detailed list of categories of documents not shared by NRC.

NRC may, on a case-to-case basis, decide to share information that is normally not public with our strategic institutional donors and other humanitarian actors.

Criteria for not sharing information

These are some of the reasons why we may be unable to disclose information:

- **Safety and security:** NRC works in some of the most challenging conflict and disaster areas in the world. Information will be withheld if disclosure may jeopardise the safety of our staff or the people we serve, or our ability to deliver programme activities.
- **Privacy:** Data protection legislation or an individual's right to privacy might prevent disclosure. We do not, for example, share personal information about our staff, people we serve or individual supporters, unless explicitly permitted to do so, and we are particularly sensitive to the privacy of minors.
- **Confidentiality:** We cannot disclose information bound by confidentiality on legal, commercial or contractual grounds. We will not share information related to investigation of staff misconduct which might allow those involved in a specific case to be identified.
- **Copyright:** We may not be able to disclose information if copyright belongs to someone other than NRC. If so, requests will be referred to the copyright holder.

- **Time and cost:** We may decline disclosure if the request proves unreasonably time or cost consuming, or if, in our judgement, the request will distract our staff from carrying out essential programme activities.
 - **Irrelevance:** We may decline disclosure if we find the request to have no discernible public benefit. Examples may be internal administrative documents or draft documents.
 - **Offensive or unreasonable requests:** We may decline disclosure if a person behaves in an offensive or abusive manner, or aims to use the information for unreasonable purposes.
 - **Commercial sensitivity:** We believe in sharing best practices, to contribute to continuous and collective improvement of the humanitarian sector. However, we will not publish information that would harm either the financial interests of NRC or those of other parties involved. This may include, but is not limited to, detailed unit costs (e.g. individual salaries and payment rates), fundraising and marketing plans, guidelines and handbooks, or documents relating to projects which have not yet secured funding.
 - **Historical information:** This policy addresses information generated after 1 June 2015. Requests for earlier material may be declined due to the cost of retrieving it, or that the documentation was not produced with public disclosure in mind, and thus include information covered by some of the criteria above.
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Misconduct cases

NRC acknowledges that misconduct (including corruption and cases involving sexual exploitation or abuse against other staff or the people we serve) may occur even with robust control systems in place, due to the challenging environments in which we operate.

Our policy is to be open and transparent about overall numbers and trends in misconduct cases in all parts of NRC. By 30 June each year, we publish an overview of the corruption cases that were closed the previous year. We also provide a general overview of closed cases involving sexual exploitation, abuse or harassment, appropriately anonymised to respect the rights of survivors.

How to access information

All relevant material shared by NRC is accessible in a digital format.

Our website, www.nrc.no, is the main access point to documents and information shared by NRC.

You may also request print copies of certain documents. We may, however, decline to provide print copies if the cost is too high, or if it will be unreasonably time consuming to do so.

We will respond to all requests as soon as possible – normally within 7 working days, and a maximum of 30 working days. Request can be sent to: openinformation@nrc.no.

Oral questions may be addressed to the External Relations Department at the Head Office in Oslo: +47 23 10 98 00

How information is shared internally

All governing documents are made available for staff on our internal Office 365 Share Point platform. This platform can only be accessed by NRC staff. This is our main internal communication channel together with Workplace and email. [See our internal channel guideline for more information on the use of internal channels.](#)

Languages and universal access

English is our main working language and most information is made available in English, with the exception of documentation specifically designed to comply with Norwegian regulations, and agreements and documents in countries where French, Spanish or Arabic are the official languages.

As a registered Norwegian NGO, we also provide a number of central documents in Norwegian.

Key documents (policies, handbooks and tools) are also translated into the main international languages – such as Spanish, French and Arabic.

Information to the people we serve is, as a matter of principle, provided in key local languages.

Norwegian authorities have implemented regulations on universal design of web sites providing public information. Although not bound by these, NRC strives to comply with the regulations, to facilitate access to information by for instance hearing or visually impaired persons.

Access to information and feedback mechanisms for displacement-affected people

The people we serve are our main stakeholders. NRC is committed to ensuring their access to relevant programme information.

NRC's complaints and feedback mechanism ensures that our programme activities respond effectively and appropriately to the needs of the people we serve at all times.

Appeals and complaints

If you are not satisfied with the reasons given by NRC for not sharing a document, you may request a review by contacting NRC at the following address: openinformation@nrc.no. or: Norwegian Refugee Council, Box 148, Sentrum, 0102 Oslo, Norway. Please mark the e-mail or letter with "Request for review of non-disclosure decision".

The Director of the department, under which the case is mandated, will review the case. In particularly difficult cases, or when important principles are involved, the NRC Ethics Board may also review the case.

NRC also welcomes feedback on the information we share, as well as our operations in general.

Under Norwegian law consumers can submit complaints about marketing methods with the Norwegian Consumer Ombudsman (Forbrukerombudet). The Ombudsman monitors marketing activities and considers complaints from consumers. It has the authority to ban unlawful marketing.

Copyright and legal implications

This policy is for information only. It 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 NRC, under applicable law.

NRC reserves all rights (including copyright) to any information and material shared under this policy.

Version 2, 20 October 2019

Appendix 1: List of categories of documents shared by NRC

Overarching documents

Information/document	Available from		Language(s)
	Website	On request	
NRC Articles of Association	<input type="checkbox"/>		English French
NRC Policy Paper	<input type="checkbox"/>		English Arabic
NRC Governance and Reporting Model	<input type="checkbox"/>		English
Organisational chart	<input type="checkbox"/>		English
NRC Protection Policy	<input type="checkbox"/>		English Arabic French Spanish
NRC Gender Policy	<input type="checkbox"/>		English
NRC Code of Conduct	<input type="checkbox"/>		English Arabic French Spanish
NRC Child Safe Guarding Policy	<input type="checkbox"/>		English Arabic French
NRC Data Protection Policy	<input type="checkbox"/>		English
NRC Anti-Corruption Policy	<input type="checkbox"/>		English Arabic French Spanish
NRC Counter-terrorism Policy	<input type="checkbox"/>		English
NRC Health, Safety and Security Policy including Duty for Care Standards	<input type="checkbox"/>		English Arabic French Spanish
NRC HR Policy	<input type="checkbox"/>		English Arabic French Spanish
NRC Alcohol and Drug Policy	<input type="checkbox"/>		English French
NRC HIV/AIDS Policy	<input type="checkbox"/>		English French

			Spanish
NRC Programme Policy	<input type="checkbox"/>		English Arabic French Spanish
NRC Civilian – Military Policy	<input type="checkbox"/>		English
NRC Complaints and Feedback Policy	<input type="checkbox"/>		English Arabic French Spanish
NRC Communication Policy	<input type="checkbox"/>		English
Open Information Policy	<input type="checkbox"/>		English
NRC Advocacy Policy	<input type="checkbox"/>		English
Global Monitoring and Evaluation Framework and NRC Evaluation Policy	<input type="checkbox"/>		English French
NRC Financing Policy	<input type="checkbox"/>		English

Programme information, reporting, evaluations

Information/document	Available from		Language(s)
	Website	On request	
Programme information – core competencies and information about what programmes we run in which countries at all times	<input type="checkbox"/>		English Norwegian
NRC Annual Report from the Board	<input type="checkbox"/>		English
Yearly financial statements (activity accounts) and related audit report, and quarterly reports to IATI	<input type="checkbox"/>		English Norwegian
External evaluations	<input type="checkbox"/>		English
General information on closed misconduct cases	<input type="checkbox"/>		English

Strategies and Plans of Action

Information/document	Available from	Language(s)
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	Website	On request	
NRC Global Strategy	☐		English

Position papers

Information/document	Available from		Language(s)
	Website	On request	
Selected advocacy documents on specific issues		☐	English

Contracts, Partnership Agreements and Memorandums of understanding

Information/document	Available from		Language(s)
	Website	On request	
Contracts		☐	English
Partnership Agreements		☐	English
Memorandums of understanding		☐	English

Appendix 2: List of categories of documents not shared by NRC

Overarching, governing documents

Information/document	Reason for not sharing
Minutes from the NRC Board Meetings	Security/privacy/confidentiality/commercial sensitivity
Minutes from the NRC Senior Management Meetings	Security/privacy/confidentiality/commercial sensitivity

Technical and thematic procedures, handbooks, standards, position papers

Information/document	Reason for not sharing
Security – Crisis contingency plans and other security related documents	Security
Human resources – such as personal details of staff: home address, family details, income, sexual orientation, illness etc.	Privacy and security
Selected financial reports – such as on-going financial reporting and quarterly reports	Commercial sensitivity
Logistical information	Security
Information and communication technology (ICT) solutions, set-up	Security
Expert Deployments	Privacy and security
Learning, Selected Monitoring and Evaluation data –	Privacy, security, commercial sensitivity
Internal audits and reviews	Security, commercial sensitivity
Selected advocacy documents on specific issues	Commercial sensitivity
Documents relating to donor relations/donor help desk	Commercial sensitivity
Communications handbooks, policies	Commercial sensitivity, security
NRC position papers (related to media messages and advocacy)	Commercial sensitivity, security
Marketing strategies plans and budgets	Commercial sensitivity

Operational Strategies and Plans of Action

Information/document	Reason for not sharing
Global Financing Strategy	Commercial sensitivity
Brand Strategy	Commercial sensitivity
NRC Strategic Objectives – on department, region, country, and representation office levels	Commercial sensitivity
Plans of Action – all levels: NRC overall, department, region, country, and representation office.	Security, Commercial sensitivity
NRC Budgeting and Planning Instructions	Commercial sensitivity
Budgets – on department, region, country, representation office levels	Commercial sensitivity
Strategy process – guidelines, procedures, standards	Commercial sensitivity

Guideline on who in NRC is responsible for making information available to the public (internal guideline)

The tables below list publicly available documents, and indicate which department is responsible for making the latest version available to the public.

The documents in table 1 and 2 are listed in accordance with the NRC document hierarchy. If a document listed in the NRC document hierarchy does not appear in these tables, it should not be made publicly available – as it is on the non-disclosure list.

1. Overarching, governing documents

Information / document	Sub document	Available from		Department responsible
		Website	On request	
NRC Articles of Association		<input type="checkbox"/>		SG Office
NRC Policy Paper		<input type="checkbox"/>		SG Office
NRC Governance and Reporting Model		<input type="checkbox"/>		Deputy SG/SG Office
NRC Protection Policy		<input type="checkbox"/>		PDS Dir.
NRC Gender Policy		<input type="checkbox"/>		PDS Dir.
NRC Code of Conduct		<input type="checkbox"/>		HR Dir.
	NRC Child Safe Guarding Policy	<input type="checkbox"/>		FO Dir.
	NRC Data Protection Policy	<input type="checkbox"/>		Deputy SG
NRC Anti-Corruption Policy	NRC Counter-terrorism Policy	<input type="checkbox"/>		Deputy SG
NRC Health, Safety and Security Policy		<input type="checkbox"/>		Security Dir
	NRC Duty of Care Standards	<input type="checkbox"/>		HR Dir.
NRC HR Policy	NRC HIV/AIDS Policy	<input type="checkbox"/>		HR Dir
	NRC Alcohol and Drugs Policy	<input type="checkbox"/>		
NRC Programme Policy		<input type="checkbox"/>		PDS Dir.
	NRC Civilian-Military Policy	<input type="checkbox"/>		PnP Dir
		<input type="checkbox"/>		

	NRC Complaints and Feedback Policy			Deputy SG
NRC Communication Policy				Ex Rel Dir and PnP Dir
NRC Monitoring and Evaluation Policy		<input type="checkbox"/>		FO Dir
Evaluation Policy		<input type="checkbox"/>		FO Dir
NRC Advocacy Policy		<input type="checkbox"/>		PnP Dir
NRC Financing Policy		<input type="checkbox"/>		PnP Dir

2) Strategies and Plans of Action

Information / document	Sub document	Available from		Department responsible
		Website	On request	
NRC Global Strategy Strategic Objectives (Overall)		<input type="checkbox"/>		Deputy SG/SG Office

3) Contracts, Partnership Agreements, Memorandums of Understanding (MOUs) (not in the document hierarchy)

Information / document	Sub document	Available from		Department responsible
		Website	On request	
Contracts			<input type="checkbox"/>	The person signing
Partnership Agreements			<input type="checkbox"/>	The person signing
Memorandums of understanding			<input type="checkbox"/>	The person signing

4) Other documents – not listed in the document hierarchy

Information / document	Sub document	Available from		Department responsible
		Website	On request	
Organisational chart		<input type="checkbox"/>		Deputy SG

NRC Annual Report from the Board		☐		Ex Rel Dir/SG Office
Yearly financial statements (activity accounts), related audit report, and quarterly reports to IATI		☐		Deputy SG
External evaluations		☐		Evaluation and organisational learning adviser
General information on closed misconduct cases		☐		Risk Management and Compliance Dir
Programme information – core competencies and information about what programmes we run in which countries at all times		☐		PSD Dir
Selected advocacy documents on specific issues			☐	PnP Dir