

## **Railway Children Open Information Policy**

Railway Children is committed to being transparent in its work and accountable to its key stakeholders, in particular children living alone and at risk on the streets. We share information with partner organisations, and the general public, and we are accountable to our staff, volunteers, supporters, donors, suppliers and governments where we work. The information we publish and how we respond to requests for information are important aspects of accountability.

Railway Children's open information policy responds to the International Aid Transparency Initiative (IATI), a UK-led international effort to improve the availability and accessibility of aid information internationally.

This initiative commits Railway Children to publish information initially about its DFID funded projects. To attain the full IATI standard all projects should be published and we will work towards publishing more of our activities in 2014.

What information we publish and how we respond to requests for information are important aspects of accountability. We will publish information, and on request will disclose information, or give reasons for any decision not to disclose (for example, to respect confidentiality or privacy). Our key criteria for the decision will be the impact on our mission to support children living on the streets. We will publish guidance about the implementation of this Open Information Policy.

## **Railway Children and the Freedom of Information Act**

Railway Children is registered as a charity (1058991) and a company limited by guarantee (3265496) in the United Kingdom. It is not a public body and so is not subject to the United Kingdom Freedom of Information Act 2000. However, we recognise 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, or the cost of disclosure would be disproportionate.

### **Criteria for Exclusion**

*If we do not disclose information, we will give reasons for not disclosing. The most frequent reasons 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 or the safety of our staff and that of our partners.

#### **Personal Information**

Some information is by its nature private to the individuals concerned. Any information that allows identification of one or more persons and would put them at risk of distress or damage will not be published, for example, funders requesting anonymity.

#### **Commercially sensitive information**

We will not disclose information that damages Railway Children's relationships based on commercial interests, for example, salaries or consultancy fees.

#### **Confidential information**

Information may be confidential because of legal, commercial or contractual reasons, or because its premature disclosure would jeopardise action that Railway Children is planning to take.

## **Cost**

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

## **Detailed information about programmes**

Our project officers' priority in information is providing information to our partners and the people for whom we work. We may decline to provide information to requests made in United Kingdom about our international programme work in other countries where this would take up significant staff time in our programme.

## **Internal planning, drafts and trivial or ephemeral information**

We will generally not disclose internal working papers that address future plans, or drafts of work, or information which we consider is of passing interest such that the work involved in disclosure is in our view disproportionate.

## **Historic information**

This policy addresses information available since January 2013. While we will make reasonable efforts to deal with requests for information, it is more likely that we will decide not to disclose historic information.

## **Multiple requests and requests with no discernible public benefit**

Where a person makes multiple requests for information, or we consider that the work involved in dealing with the request has no discernible public benefit, we may decide not to spend time in dealing with the request. Such decision will be taken by the Chief Executive. If any person makes a request in an offensive manner, or has otherwise been abusive to staff or volunteers, then we may decline to engage in correspondence with that person.

## **Copyright Limitations**

In some cases we do not have the right to disclose information because someone else holds the intellectual property rights, and while we have the right to make internal use of it this does not extend to publishing it. We do favour open publishing where we can.

## **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. An example would be information about a campaign involving particular targets, where the disclosure could jeopardise the effectiveness of the campaign.

## **To make requests for information**

Requests for information can be made in writing to:

Railway Children  
1 The Commons  
Sandbach  
CW11 3RN

Or by email to [hello@railwaychildren.org.uk](mailto:hello@railwaychildren.org.uk)

We will endeavour to respond to your requests promptly, but where this is not possible applicants should allow a period of 14 days for a response.