

Information Disclosure Policy

**Development Wheel (DEW)
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Development Wheel (DEW) Information Disclosure Policy

Introduction

Development Wheel (DEW) is committed to making information about its activities available to the public. DEW considers public access to information a key component of effective engagement with all stakeholders. Public access to DEW information facilitates transparency and accountability and enhances trust in DEW's activities.

Purpose and objectives

- This Information Disclosure Policy is intended to ensure that information concerning DEW's activities is made publicly available, subject to the limitations set out in this Policy. To that end, this Policy explains principles, practices and procedures and defines clear categories of information according to their status with regards to public disclosure.
- Information held by DEW is made available primarily through the DEW website.
- DEW management is accountable to the DEW Executive Board. DEW management considers that public access to DEW information further facilitates DEW's transparency and accountability.

Scope of this Policy

- a. This Policy applies to all Information in the custody of DEW. For the purposes of this Policy, "Information" means any produced content, in any medium (paper, electronic or sound, visual or audiovisual recording) concerning a matter relating to DEW's activities.
- b. Information jointly owned with third parties, for example, memoranda of understanding, donor agreements, and other contractual arrangements, will be made available on a case by case basis with the agreement of the parties concerned.

General principles of access to information

- a. Information accessible to the public shall be made available, as far as reasonable and practical, through the DEW website. An overview of information presently available to the public (or which is made available on an on-going basis) is listed in **Annex 1**.
- b. This Policy is guided by the principles of openness and transparency, such that any information concerning DEW is publicly accessible, or available upon request, unless one or more of the exceptions to the Policy, or another compelling reason, applies.

Categories of Information

DEW is committed to open and transparent disclosure of information. Nevertheless, there are legal, operational and other practical considerations that are necessary to preserve the interests of the Organization, as well as those of its staff and third parties with which DEW collaborates. The application of these considerations has resulted in some exceptions to the principle of disclosure. As such, DEW information is classified by reference to three broad categories: publicly available information, information available on request, and confidential information.

Category 1: Publicly available Information

Annex 1 set out an overview of publicly available information (i.e. information which is available on the DEW website).

Category 2: Information available on request

DEW makes available certain types of information on request only. In some cases, limitations may apply with regard to the types of requestor to whom information will be made available. Restrictions (e.g. redaction of content) or conditions may be applied to the use of information available on request. **Annex 2** sets out an overview of information available on request.

Category 3: Confidential information

1. Information identified as confidential by DEW constitutes an exception to the principle of public disclosure. **Annex 3** provides an overview of information considered by DEW to be confidential. The exceptions to disclosure reflect what is necessary to preserve legitimate public or private (including personal privacy) interests.
2. Decisions and resolutions of the Executive Board may contain information disclosure limitations. Nothing in or relating to this Policy will be deemed in any way to limit or modify the application of decisions or resolutions of the DEW governing bodies.

Procedure for submitting requests for disclosure of information

1. Any individual or entity may request the disclosure of DEW's non-confidential information that is not otherwise available through DEW public-access website. Requests for disclosure of information should be clearly formulated and as specific as possible, and should identify the individual or entity making the request, the information being requested (with the title of the document, if known) and the time period covered by the request, where relevant.
2. This Policy does not apply to data existing only in raw form, either physically or electronically. DEW is not able to respond to requests that require the selection and/or manipulation of data to produce content.

3. Requests for disclosure of information must be submitted to the following email address: dewsalam@gmail.com
4. DEW will endeavor to process requests for disclosure of information as promptly as possible. Depending on the complexity of the request, DEW will seek to respond to requests within 60 days of receipt of the request. DEW may charge a fee for requests for information, based on the estimated costs of retrieving and supplying the information requested which will be communicated to the requestor and must be paid in advance. DEW will refund the fee if the information requested is not provided. DEW reserves the right to charge an additional fee in complex cases.
5. If a requestor is not satisfied with DEW's response to a request for disclosure of information, they may request in writing an internal review of DEW's response. Requests for internal DEW review should be submitted to the email address mentioned above. Such internal review will be carried out by the first level supervisor of the DEW staff member who signed the initial response. Subject to the complexity of the request, DEW will aim to respond within 60 days of receipt of the request for internal DEW review.

Conditions:

1. DEW may deny a request for disclosure of information, in whole or in part, if any of the following situations apply:
 - i. If the request is deemed by DEW, in its sole discretion, to be an excessive demand upon DEW's resources, i.e. requiring a total of two or more days of full time staff hours (or its equivalent);
 - ii. If, in the judgment of DEW, the request is unreasonable, repetitive, abusive or vexatious; or
 - iii. If the request is related to one or more similar request(s) that have been denied by DEW.
2. If only part of the information that is responsive to a particular request for disclosure is subject to one of the limitations set out in this Policy, DEW may decide, at its sole discretion, that the remaining part of the information, responsive to that request, will be disclosed. In such cases, DEW will take appropriate measures to preserve the confidentiality of the information that is not disclosed.
3. The implementation of this Policy is subject to the intellectual property and other proprietary rights of DEW and third parties, including but not limited to patents, copyrights, and trademarks, which may, inter alia, limit the right to reproduce or exploit information.
4. No representation is made or warranty given, express or implied, as to the completeness or accuracy of information made available by DEW. Moreover, DEW does not warrant that the use of any third-party-owned individual component contained in the requested

information will not infringe on the rights of those third parties. The risk of claims resulting from such infringement rests solely with the requestor/user. It is the responsibility of the requestor/user to determine whether permission is needed for any use of the information and to obtain permission from the copyright holder. In no circumstances will DEW be liable for any direct or indirect loss arising from the use of information.

5. Nothing contained in or relating to this Policy, or done pursuant to it, shall be construed as a waiver of any of the privileges and immunities enjoyed by DEW under national or international law, and/or as submitting DEW to any national court jurisdiction. Without limiting the generality of the previous sentence, the disclosure of information in response to a request for disclosure, will not constitute a waiver, express or implied, of any of the privileges and immunities of DEW.

Entry into force and application of this Policy

- This Policy shall enter into force on the date it is signed by the Executive Director of DEW. It applies to information created or coming into DEW's possession after its entry into force. This policy will be implemented progressively over a period of two years from coming into force, subject to availability of resources, to accommodate revisions of related internal policies and procedures.
- Heads of DEW is responsible for ensuring compliance with this Policy, and for defining and periodically reviewing the classification of information for which they are responsible, in accordance with this Policy.
- This Policy will be reviewed within three years of entry into force.

ANNEX 1

Overview of DEW information available on dedicated DEW websites ("Publicly available information")

1. Institutional information

- 1.1 About DEW
- 1.2 The work of DEW
- 1.3 DEW Constitution and basic documents

2. Governance and Oversight

- 2.1 Governing Bodies
- 2.2 Independent Oversight

3. Management information and internal governance

- 3.1 Finance
- 3.2 Human Resources
- 3.3 Accountability and risk management
- 3.4 Internal senior management meetings

3.5 Internal Policies and Strategies

Disclaimer: This list is not exhaustive, and other types of information may need to be added to the category of DEW Publicly available information.

ANNEX 2

Overview of types of DEW information available on request **(“Information available on request”)**

This comprises all remaining information which is not publicly available on the DEW website (Annex 1), but is not classified by the Organization as confidential information (Annex 3).

ANNEX 3

Overview of types of DEW information considered to be confidential **(“Confidential information”)**

Confidential information is not subject to disclosure.

The following categories of information are classified as “Confidential information”:

Personal information

DEW does not provide access under this Policy to information and documentation pertaining to either staff members or non-staff members performing DEW work, including:

- Private and employment-related information, including human resources records, medical records, salaries and benefits, personal communications;
- Personal information received from individuals performing work for DEW including technical and scientific experts;
- Information on staff appointment and selection processes;
- Information on claims and internal conflict resolution proceedings;
- Personal declaration of interest forms and related internal deliberations or similar issues submitted by DEW staff members, as well as other individuals performing work for DEW and experts participating in DEW technical meetings;
- Information about investigations of allegations of misconduct (other than as reported to DEW Governing Bodies).

Security and safety

- Information, the disclosure of which may endanger the life, health, safety or security of any individual, or
- Information, the disclosure of which may violate the rights of any individual or to invade his or her privacy;
- Information, the disclosure of which may compromise the security and safety of any international organization (or its personnel) with which DEW collaborates;
- Information, the disclosure of which may jeopardize DEW property;

- Information about logistical and transport arrangements related to DEW shipments of its property and documents and the shipment of staff members' personal effects.

Information concerning DEW's intergovernmental organizations Information, the disclosure of which may adversely affect DEW's relations with other intergovernmental organization; **Information obtained or shared in confidence**

- Information received from or sent to third parties under an expectation of confidentiality;
- Information obtained in confidence from a government, international organization or other entity or person that would or would be likely to, if disclosed, compromise the Organization's relations with that party.

Confidential Internal documents

- Internal email correspondence;
- Internal reports, analyses, reviews, notes for the record of internal meetings or meetings with third parties, statistics prepared solely to inform DEW's internal decision-making processes;
- Internal policy, guidelines, standard operating procedures, unless otherwise decided;
- Internal telephone directories;
- Information pertaining to corporate administrative matters.

Deliberative information

- Information concerning DEW's own internal deliberations, communications (including internal inter-office or intra-office documents such as emails, memos, and draft documents);
- Documents relating to the communications, deliberations and decisions of DEW internal bodies and internal advisory committees
- Contributions to and deliberations of DEW expert panels and committees, technical advisory groups, including communicators between DEW and its experts;
- Internal management documents produced by DEW for the information of senior management including without being limited to internal briefings, reports, self-assessments, corporate risk register;
- DEW's communications and deliberations with which DEW collaborates.

Privileged information

- Information covered by legal privilege, or the disclosure of which may expose DEW to legal risk;
- Legal advice and requests for legal advice;
- Information related to due process rights of individuals involved in internal audits and investigations⁶;

Financial information

- Documents, analyses, correspondence or other information prepared for financial and budgetary transactions, or for the development of internal or external financial reports;
- Banking or billing information of DEW offices and vendors (companies or individuals), including consultants.

Commercial information

- Commercial information which, if disclosed, may harm either the financial interests of DEW or those of third parties;
- Information relating to DEW's procurement processes;
- Information that is subject to obligations of confidentiality or non-disclosure pursuant to confidentiality agreements or other contractual or legal obligations of the Organization or which could, if disclosed, expose the Organization to legal risk or violate applicable law or the Organization's internal regulations, rules and procedures.

Other

- Other kinds of information, which because of its nature, content or the circumstances surrounding its creation, use or communication is deemed confidential in the interests of DEW or third parties;
- Passwords, pins and other access codes for DEW systems.

Disclaimer: This list is not exhaustive, and other types of information may need to be added to the category of DEW Confidential information.