

# Publish What You Fund Transparency Policy

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As an organisation focusing on access to information and transparency, openness on who funds Publish What You Fund, how the organisation is governed and how it operates, strengthens its credibility and accountability. Transparency also contributes to increasing the efficiency of Publish What You Fund's work, reduces the risk of corruption, and enhances the organisation's relations with external partners and stakeholders.

This policy is guided by openness with the underlying presumption that, whenever possible, information concerning Publish What You Fund's governance and operational activities will be made available in the absence of a compelling reason for confidentiality. Publish What You Fund is committed to giving stakeholders access to the information that will enable them to understand the governance, operations and funding of the organisation.

## 1. Ethics

Publish What You Fund maintains high standards of ethics and behaviour for its Board and staff. These are detailed in the organisation's employee handbook and include policies on anti-bribery and whistle-blowing. Publish What You Fund has a zero-tolerance approach to fraud or corruption, whether perpetrated by its own staff or Board, or in connection to specific projects to which it has committed funds. The organisation is committed to ensuring that its financing is used for the purposes intended. Copies of the employee handbook can be requested by emailing: [info@publishwhatyoufund.org](mailto:info@publishwhatyoufund.org)

## 2. Governance

Publish What You Fund is governed by a Board of Directors. Details about the current Board of Directors and their Terms of Reference are available from the accountability section on the organisation's website.

Publish What You Fund aims to comply with best practice in the way it presents, controls and publishes its financial statements and reports on its activities. Annual reports detail the organisation's recent activities and audited accounts. Detailed annual accounts are also available via the [IATI Registry](#) and are submitted with [Companies House](#).

## 3. Disclosure of information

Publish What You Fund operates under a presumption of disclosure, meaning that all information held by the organisation is subject to disclosure upon request, unless there is a compelling reason for non-disclosure. There are certain constraints on the information that is disclosed – see exceptions below. Anyone has the right to request and receive timely information from Publish What You Fund. When considering these requests, the organisation does not discriminate or give privileged access to information.

While Publish What You Fund is committed to a policy of presumption of disclosure, it also has a duty to respect professional secrecy, in compliance with UK law, in particular legislation protecting the sharing of personal data. Access to information shall be refused where disclosure would undermine the protection of:

- Privacy and the integrity of an individual, in accordance with UK legislation regarding the protection of personal data.
- Where disclosure would undermine the protection of commercial interests of a natural or legal person; intellectual property; court proceedings and legal advice; and investigations and audits.

Requests for disclosure of specific information can be sent to: [info@publishwhatyoufund.org](mailto:info@publishwhatyoufund.org). All requests shall be handled promptly and responded to within 20 working days. Responses will either grant full or partial access to the information requested; the reasons for total or partial refusal to share the information shall also be provided.

Any appeals against decisions can be made to the same email address and will be considered by the Board of Directors. All appeals shall be responded to within 20 working days. For complex issues that cannot be answered within this timeframe, the appellant will be informed of the reason of the delay and the deadline for reply can be extended to a maximum of 40 working days from the original date the appeal was submitted.