



Information Disclosure Policy

Policy adopted by the DCAF Directing Board on 2 May 2018

DCAF is dedicated to improving the security of states and their people within a framework of democratic governance, the rule of law and respect for human rights. We assist partner states – and international actors supporting partner states – to improve the governance of their security sector through inclusive and participatory reforms based on international norms and good practices.

As part of our commitment to good governance and accountability, DCAF believes in an open information approach, whereby all information related to its work is freely and publicly available, unless the publication of such information falls in one of the following categories:

- Disclosure would negatively affect **relations** between DCAF and partner organisations, government(s), and/or other stakeholders
- Disclosure would put the **safety and security** of DCAF and/or its partners at risk
- Disclosure would jeopardize the **privacy** of staff, partners or other specific persons;
- **Confidential** information
- Disclosure would constitute a breach of data-protection laws or agreements, or any other **laws or regulations**
- Disclosure would entail **disproportionally high costs** in order to reach a minimum data quality

This policy complements DCAF's commitment to ensure that its donors are well informed of the proper use of their contributions.

External relations

DCAF keeps data confidential that might otherwise harm its relations with its partners. DCAF is the final decision-maker for not publishing part of its data.

Safety and security

DCAF does not publish data if there is a reasonable expectation that it might compromise the safety or security of any individuals, groups of beneficiaries, partner organisations, donors, suppliers or staff.

Privacy

DCAF does not publish any project information that is traceable to an individual person and can reasonably be judged as an invasion of the privacy of that person without their prior consent.

Confidential information

DCAF does not disclose information that is confidential on legal, commercial, contractual grounds or on the basis of considerations related to substance. Where DCAF projects fall within this exclusion category, DCAF is committed to working with its funders and partners to move towards allowing us to share information with our stakeholders.

Laws and regulations

DCAF will not disclose information that it has no right to disclose, and of which it does not have ownership. This includes where the intellectual property rights do not reside with DCAF.

Costs

DCAF values the quality and consistency of the information that it publishes. Equally, DCAF needs to balance its commitment to transparency with the delivery of results, especially where it involves public funds. DCAF does not therefore publish when the financial or time cost of disclosing the information would be unreasonably high. This also applies to where the information requested is historical, and it is time-consuming and costly for DCAF to obtain archived material.

Decision-making on excluding data

Responsibility for excluding information lies at the level where the information can be assessed in detail, i.e. the level of the Departments, Divisions and Units. Information will be assumed to be available for publication unless Heads of Departments, Divisions or Units decide otherwise, according to this Policy. The Heads of Departments, Divisions and Units will review all information excluded from disclosure on an annual basis in order to assess whether the application of the policy to that information is still valid.

It is the responsibility of the Director to ensure a consistent application of the policy across DCAF.