

Information Policy

Policy No:**Written by:** Janet Dalziell and Anne Dingwall**Approved by:** GPI SMT,**Approved on / Effective from:** 24 September 2012**Approval decision reference:** SGC Board Motion 24/9/2012**For:** SGC Board of Directors**Responsible for monitoring/Ownership:** International Executive Director**Approval pathway:** Chief Operating Officer
SMT
International Executive Director
SGC Board of Directors

Objectives

Stichting Greenpeace Council (GPI), as signatory to the INGO Accountability Charter, is committed to enhancing transparency and accountability, both internally and externally. We strive for openness and ease of access to information, to constantly improve our accountability and performance, and to be able to provide information to those who request it.

This policy is designed to ensure best practice in the handling of Greenpeace's information, following the principles of availability, integrity and confidentiality (in priority order), and ensuring we meet legal requirements, in order to allow information to be shared in a transparent and efficient way, while at the same time safeguarding, from abuse or compromise, our supporters', people's¹, allies' and partners' and our own sensitive information.

Applicability

This policy applies to all Greenpeace people, systems, processes and technology, and extends to activities and transactions in all countries in which Greenpeace directs people to operate permanently, periodically and occasionally.

All Greenpeace people are responsible for complying with this policy, and with related management systems and procedures. Non-compliance with this policy could result in disciplinary procedures.

¹ "People" are defined as all Board members, permanent and temporary salaried staff, interns, volunteers and freelancers/contractors under the direction of (deployed by) GPI. Note that according to Dutch law, GP NRO staff/volunteers who participate in a GPI-directed activity could be considered to be under the direction of GPI. In the case of a conflict between this policy and the *Collective Labour Agreement Between Nautilus NL and Stichting Greenpeace Council ships' crew members covered under the Rules and Regulations for ships' crew onboard of vessels operated by Stichting Greenpeace Council* the rules and regulations of the Collective Labour Agreement will apply.

Introduction

Greenpeace believes that timely free flow of information in simple and accessible language, form and format is essential for ensuring accountability, learning, trust and good performance.

This policy codifies our commitment to transparency and to the sharing of information. Its purpose is to give guidance to our people on the ways and means for sharing of information, and to be able to meet our commitment to inform people external to our organisation on the information they can expect or demand from Greenpeace.

It is also guided by our commitment to our professional, moral, ethical and legal & regulatory responsibilities to protect information that is in our possession against abuse or compromise. Meeting these responsibilities requires risk assessment, management systems and procedures, with control systems striking a balance between productivity, cost, effectiveness, and the value of the information being protected.

The Policy

GPI is committed to openness, transparency and honesty about our structures, mission, policies and activities, believing that this is essential to good governance, whether by governments, businesses or non-profit organisations. We communicate actively to our stakeholders² about ourselves, and make information publicly available.

We freely, and openly share information on:

1. **Fundamentals:** our vision, mission, values, goals and objectives, legal registration and status and registered office address.
2. **Governance & key staff:** Names and brief biographies of members of Board of Directors, Chair, Executive Director and Senior Management Team members.
3. **Organisational decision-making:** who decides Directors' appointments; staff recruitment; staff development and promotion; strategies, plans and budget approval; reviews and evaluations.
4. **Performance:** lessons, achievements, success, failures, constraints, and innovations, through annual reports, review reports and audit statements.
5. **Staff:** human resource statistics, Board and Executive remuneration, aggregated other staff costs, structure of departments.
6. **Funds and finance:** Types, proportion and absolute figures of income; sources of income, expenditure by categories; staff costs, support costs, programme cost, fundraising cost, administration cost; fundraising costs.
7. **Relationships:** Key relationships we have in terms of which groups, partnerships, networks, coalitions, and alliances we belong to and work with, who we receive money from, in what we invest our money, who are our bankers, auditors, lawyers.

² Greenpeace stakeholders are our financial supporters, volunteers and online communities, plus our staff, research partners, campaigning allies and those local communities we work alongside. In addition our stakeholders include those we seek to persuade in government, industry and the media, and those who depend on the industries and eco-systems impacted by our campaigns. More specifically, Greenpeace International's stakeholders include our activists, our financial supporters, including major donors and foundations who have funded specific projects, our staff volunteers and Boards, Trustees and Voting Members and members of like-minded organisations with which we partner to achieve a common goal. We actively seek feedback from these groups in a variety of ways. Stakeholders also include the decision-makers whose opinions and actions we aim to influence.

8. **Issue-based positions:** Our guiding thinking and positions on issues related to our mission, objectives and strategies.
9. **Grievances:** guiding and decision making policies and procedures related to how we receive and deal with grievances, and how we receive complaints and comments from within and outside our organisation.
10. **Feedback:** Regular feedback from our stakeholders publically available on our blogs and social media sites, and periodic presentation of our stakeholders' views of us and our performance in our annual reports.

We are committed to: protecting the interests of our supporters and our people by safeguarding their sensitive information from abuse or compromise; complying with regulatory requirements and directives on data security³; ensuring the effectiveness of our activities; and meeting our ethical responsibilities to our partners and allies. We will protect data for the following reasons:

1. **Legal requirements:** compliance with Data Protection/Privacy laws; and information required by legal, contractual or copyright obligation to be kept in confidence;
2. **Ethical obligations:** to protect the sources of information we receive in confidence⁴;
3. **Disputes:** legal advice and matters in dispute or under negotiation, including disciplinary and investigative information generated in or for GPI;
4. **Respect for personal privacy:** personal information about our people, including but not limited to payroll and banking records, human resources files, sexual orientation, property, and medical records;
5. **Obligation to our supporters:** the rights of our supporters to anonymity except in cases where the amount of their donation is such that it might be perceived to negatively impact on our independence;
6. **Duty of Care for the safety and security of our people:** risk assessments, security management plans and operating procedures, where release of this information could increase risk to our people or our partners;
7. **Sensitive time-critical and time-limited activities:** Campaign and communications plans, research and investigations information collection, sensitive financial expenditures, where premature release of information could jeopardise actions we are planning to take.
8. **Cost concerns:** when we determine that the cost of supplying information, in time or monetary expenditure, would be disproportional to the request, we may decline but will explain that this is the reason.
9. **Access to historic information limited through agreements with other parties:** Greenpeace archives are, for example, held at the City of Vancouver Archives in Vancouver, Canada (<http://vancouver.ca/ctyclerk/archives/index.htm>) and at the International Institute of Social History in Amsterdam, The Netherlands (<http://www.iisg.nl/index.php>).
10. Anonymous requests for information may not be responded to.

Temporary Suspension

Any temporary suspension, made only under exceptional circumstances, of all or part of this policy can only be authorised by the GPI Executive Director and will be clearly explained to our people, and to the general public through the mechanisms described at (1) below.

³ Data security is the means of ensuring that data is kept safe from corruption and that access to it is suitably controlled. It ensures privacy and protects personal data.

⁴ See related GPI Board-approved Whistleblower Policy 2011

Implementation procedures

1. Make information about Greenpeace publicly available including through: the Greenpeace website; reporting against the INGO Accountability Charter; and our Annual Reports.
2. Prepare and execute an Information Management Program which ensures delivery of:
 - i. Information Risk & Compliance Assessments based on a generic template
 - ii. Local (NRO specific) Information Management plans
 - iii. Implemented Management & Compliance Controls
 - iv. Oversight on/monitoring of the effectiveness of implemented Controls
 - v. Periodic Information Management training for our people
3. Establish systems for annual review of compliance with this policy

Policy revision status	
Next revision due	2016
Responsible for initiating revision	Chief Operating Officer
Revision history	New policy