

## OXFAM DENMARK OPEN INFORMATION POLICY

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Approver:	Management Group (MG)
Governance document (policy) owner (accountable):	Laust Leth Gregersen, Director of Policy and Domestic Program
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Reference to:	Links to other policies to be established as these are approved
Next periodical review:	Relevance-based, at latest every three years from approval (March 20, 2028)

### BACKGROUND AND PURPOSE OF THE POLICY

Oxfam Denmark (ODK) seeks to emphasise its commitment to transparency to stakeholders outside the organisation through this open information policy and to generally increase the focus on transparency in all of the organisation's operations and programmes.

The policy is further relevant to demonstrate ODK's commitment to transparency, just as ODK demands transparency from the powers and drivers of inequality it challenges.

The policy addresses open information at-request from external parties, i.e. when ODK is approached to share information about our work. It does not regulate when and how ODK publicly shares information pro-actively according to our own strategy and priorities such as on its homepage, in reports etc.

## **CONSIDERATIONS AND CONSTRAINTS TO INFORMATION SHARING**

While ODK believes in openness, this policy operates under the below considerations which constrain which information can be shared.

### **Decision-making on information sharing**

ODK will share information that has already been made public. For internal information or information that has not yet been made public, information disclosure may be restricted. ODK applies the principle of *“open, unless...”*. The most frequent reasons for exclusion from publication are, if publication would:

#### **1. Put the security and safety of staff and other stakeholders at risk**

The safety of Oxfam's staff, partners and beneficiaries is a primary concern. ODK will not disclose any information which might pose a security or safety risk to persons, organisations, its own staff, donors, suppliers or beneficiaries. An example would be information about a campaign involving particular persons, organisations, and/or locations, where the disclosure could jeopardise the effectiveness of the campaign or safety.

#### **2. Harm operations**

There will be occasions where ODK will not disclose information because it considers that the disclosure could harm its work, whether in Denmark or in its international operations.

#### **3. Breach data protection or other laws and regulations**

ODK does not publish data where national or international law, such as the General Data Protection Regulation and its national equivalent, prevents their publication. Non-disclosure may also be part of a cooperation agreement or copyright provision, or other contractual conditions.

#### **4. Affect confidentiality**

Information may be confidential because of legal, commercial or contractual reasons, or because its premature disclosure would jeopardize actions that ODK is planning to take.

#### **5. Not be cost-effective**

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

## **6. Jeopardising relations, strategic or economic interests**

Where ODK may decline disclosure where it considers that the disclosure might negatively affect ODKs or a partners relation relations with donors, governments or other stakeholders, or it may negatively influence strategic or economic interests and internal planning.

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

Where a person or organisation makes multiple requests for information, or ODK considers that the work involved in dealing with the request has no discernible public benefit, ODK may decide not to spend time in processing the request. Such decision will be taken by the Head of Public Affairs, Advocacy and Danish Programme, and will be subject to review by the Secretary General. If any person makes a request in an offensive manner, or has otherwise been abusive to staff or partners, then ODK may decline to engage in correspondence with that person or entity.

Where a request is related to another Oxfam affiliate, ODK will forward that request, but does not have the right to insist on compliance.

## **LANGUAGE AND TRANSLATION**

This Open Information Policy applies primarily to information requests in the Danish and English languages addressed to the ODK office in Denmark since most information is published in the English or Danish language. It is for the requester to bear the cost of translation to languages other than Danish and English.

## **WHERE TO DIRECT REQUESTS FOR INFORMATION**

Requests for information can be sent to [oxfam@oxfam.dk](mailto:oxfam@oxfam.dk).

## **TIME FOR RESPONSE TO REQUESTS FOR INFORMATION AND ASSOCIATED COSTS**

ODK endeavours to respond promptly, all requests should be responded to within 20 working days, unless there is a compelling reason why this is not practical. Costs other than ODK's time spent on the request for information are at the expense of the person who made the request, and an estimate will be made available before the cost is incurred.

*End of policy*