




DOCUMENT ADMINISTRATION

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1.0	Prepared by: Executive Office	November 2010
	Reviewed by: MD, Policy and Performance MD, Programme Delivery MD, Legal and Governance MD, Finance and Operations Internal Auditor Interim CEO Executive Team (sub-group on Corporate issues)	
	Approved by: Executive Team	1 March 2012
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Access to Information Policy

1. Purpose

1.1 The purpose of this policy is to enhance Gavi's accountability towards Alliance partners and stakeholders, as well as the general public who may be interested in Gavi's work, by providing access to the information that will enable Gavi partners and stakeholders to understand its governance, strategies, policies and activities.

1.2 This policy is based on the premise that the effectiveness of Gavi's programmes will be strengthened by public access to information, and that broad availability to the public of information about Gavi's activities will increase understanding and support of Gavi's mission.

1.3 This policy sets out the categories of documents that shall be made publicly available to external audiences through the Gavi website and other appropriate means of communication.

2. Principles

2.1 Transparency: Gavi recognises that there is a positive correlation between a high level of transparency through information sharing and public understanding of GAVI supported activities. The general policy of Gavi is to operate in a transparent and accountable manner, consistent with its Statutes and By-Laws.

2.2 Presumption in favour of disclosure: Gavi's Access to Information Policy is guided by openness with the underlying presumption that any information regarding Gavi programmes and operations is available to the public, in the absence of a legitimate reason for confidentiality in line with the exceptions in Section 4.

2.3 Easy access to information: In order to facilitate public access to information and transparency around Gavi's operations, information concerning Gavi's decisions and operational activities will be made available to the public in the manner outlined in this policy.

3. Disclosure categories

Documents to be posted on Gavi's Website

3.1 Subject to the exceptions set out in Section 4, the following information will be made publicly available, in particular through posting on Gavi's website:

- A list of all current Board members and Alternates, and members of each Board Committee.
- Minutes of each Board meeting following their approval by the Board, including the full text of decisions approved by the Board and accompanying Board reports.
- Minutes of each Executive Committee (“EC”) meeting following their approval by the EC, including the full text of decisions approved by the Committee and accompanying EC reports.
- Minutes of each of the other Board Committee meetings following their approval by the applicable Committee and after the next Board meeting, including the full text of decisions approved by that Committee.
- The Gavi Alliance Statutes and By-laws.
- The Gavi Alliance Annual Progress Reports.
- The Gavi Alliance Strategy, Business Plan and its Approved Budget.
- Gavi country financial commitments and disbursements.
- Country applications and annual progress reports for approved country programmes.
- Programmatic and Finance policies.
- Secretariat policies.
- Gavi evaluations once approved by the Board.
- Gavi Annual Financial Report (including Gavi’s Consolidated Financial Statements of the Gavi Alliance, IFFIm and GFA).
- Financial Management Assessments
- Internal and Country Audit Reports.
- Investigation Reports.
- Tax returns that Gavi files may be retrieved from the websites of the relevant tax authorities such as www.guidestar.org for the filing to the United States Internal Revenue Service (IRS) and www.charity-commission.gov.uk for the submission to the Charity Commission of England and Wales.
- Such other documents that Gavi may decide to make publicly available.

Documents to be disclosed on request

3.2 Subject to the exceptions set out in Section 4 below, and any restrictions imposed by applicable law, all GAVI documents held by the Secretariat shall be available for public disclosure upon request, provided the costs of making such documents available are reasonable.

4. Exceptions

4.1 Gavi is committed to ensuring that an open and transparent disclosure system is put in place. However, there may in some instances be legal, operational and practical considerations that are necessary to preserve the organisation's interests, as well as those of its staff and its various partners, which may prevent Gavi from achieving full disclosure. Information under the following categories are considered confidential and not available to the public:

- (a) Information received from or sent to third parties, under an expectation of confidentiality;
- (b) Information whose disclosure is likely to endanger the safety or security of any individual, violates his or her rights, or invades his or her privacy;
- (c) Information whose disclosure is likely to endanger the proper conduct of any Gavi operation or activity;
- (d) Information covered by legal privilege or related to investigation cases on individuals, and information pertaining to legal advice;
- (e) Information related to enquiries, investigations and follow up on indications into possible misuse of Gavi funds;
- (f) Information on Gavi's internal deliberations and communications;
- (g) Commercial information that would harm either the financial interest of Gavi or those of third parties involved;
- (h) Commercially sensitive information and restrictions imposed by applicable law or contract;
- (i) Information pertaining to personal employment records;
- (j) Information pertaining to whistleblowers.

4.2 Harm test and public interest override: In exceptional circumstances, Gavi may decide to disclose the information deemed confidential as listed above if it determines that the overall benefits and public interest of such disclosure outweigh the likely harm to the interest(s) protected by the exception(s). This may include situations in which Gavi determines that the disclosure of certain confidential information would avert imminent and serious harm to public health or safety. Such disclosure by Gavi would be on the most restricted basis necessary to achieve the purpose of the disclosure.

5. Appeals

5.1 If a requester of information does not obtain the desired information from the GAVI website or from contacting Secretariat staff, or if the information requested is denied for reasons that appear inconsistent with this policy, the requester may appeal to Gavi.

5.2 Such appeals will be considered by a panel consisting of Gavi's Internal Auditor and Director, Legal.

5.3 Gavi will consider all requests with legitimate concerns from any organisation or individual.

5.4 Requests should be directed to: Access to information appeals panel, p/o Director, Legal, Gavi, the Vaccine Alliance
Address: 2 Chemin des Mines, 1202 Geneva, Switzerland
Email: accesstoinformation@gavi.org

5.5 Every request will be acknowledged. The panel expects to respond to requests within 30 calendar days of their receipt.

6. Effective date and review of policy

6.1 This amended policy comes into effect as of 5 March 2015.

6.2 This policy shall be reviewed and updated as and when required.