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Guidelines for information sharing

1. Introduction

Act Church of Sweden bases its international work is part of a worldwide ecumenical movement. Our starting point is a life-empowering theology that is expressed through the active choice to be present with those living in vulnerable situations. Act Church of Sweden aims to ensure that our commitments to quality and accountability permeate in all the activities we undertake. We believe that the people and organisations that we are accountable to, and on whose support we rely, are entitled to receive accurate and timely information about us.

The scope of the Guidelines for information sharing is solely for Act Church of Sweden including church cooperation, development cooperation, humanitarian aid, policy dialogue and mobilisation, support and fundraising. It is intended as a guide for staff and members of the governance structures who work for or represent Act Church of Sweden how and what information is shared with stakeholders.

The Church of Sweden must comply with rules concerning transparency in the Church Ordinance and can only refuse to disclose information in select cases, known as the Public access to information principle¹. For further details, see section 3 of this Guideline.

2. Scope and Purpose

The Guidelines set out the information that Act Church of Sweden shares with its stakeholders, how the information will be disseminated, and what may not be disclose and why.

The purpose of specifying what, to whom and how information will be shared is to improve the quality of the work, strengthen mutual respect within our partnerships, enable people to influence the decisions affecting their lives, and ensure that all stakeholders can hold Act Church of Sweden to account. This document is also a guide to staff and management to ensure that Act Church of Sweden implements according to the Public access to information principle. It also details what information Act Church of Sweden requires and encourages partners to share.

In this Guideline, the following terms are defined as:

- *Partner*: all partner churches and organisations that Act Church of Sweden enters into Cooperation and Funding agreements with to collaborate on a mutually agreed action.

¹ Known internally also as principle of transparency, sk Offentlighetsprincip. The Church of Sweden decided to continue to abide by the Public access to information principle after separating from the State in 2000. In general, the content and rules of the Church of Sweden's Public access to information principle and the Swedish Public Access to Information Act are the same. The Secrecy Act however, is not regulated in the Church Ordinance but by collective agreements.

- *Stakeholders*²: all those with whom we interact in our work, including but not limited to rights-holders, target groups, duty bearers, partners, staff, volunteers, churches, partner churches, global ecumenical alliances (WCC, LWF and ACT Alliance), civil society organisations, regional and national civil society and ecumenical networks, political and decision making bodies in the EU and Sweden, authorities in Sweden, companies and industry associations, media, institutional donors, private donors, the Church of Sweden Board, International Commission and members of the Church of Sweden, its diocese and parishes

3. Public access to information and non-disclosure

As the Church of Sweden abides by the Public access to information principle and our commitments to quality and accountability, brief information about our organisation and activities are made available publically for our stakeholders as far as is possible³. If it is not already published, detailed information must be actively requested⁴. Should a request be made, the Church of Sweden legal department will make a decision on whether or not to release the confidential information⁵.

Act Church of Sweden will not disclose certain information about itself, its partners or activities if there are legal, security, context or confidentiality concerns. This includes situations when Act Church of Sweden staff, partners, target groups or rights holders are at risk, vulnerable, under threat or the information is marked confidential by Act Church of Sweden or its partners.

4. Information shared about Act Church of Sweden

4.1 Public documents

The following basic organisational, strategic, governance, management and programmatic information about Act Church of Sweden is available electronically on our website in Swedish, English and Spanish:

- *Basic facts about the Church of Sweden, who we are, what we do and where we work*
- *Strategic plan and Our theology*
- *Management and governance*
- *Quality and accountability framework*
- *Guidelines and policies*
- *Position papers*
- *Economy, finances and operations*
- *Complaints and response mechanism*
- *Codes of conduct*

The following information is available on our website in the appropriate language(s):

² List of stakeholders is based on Balance scorecards, also see Annex 1. Rights holders and target groups are defined in each programme and work plans including the country programmes, the humanitarian programme, the global policy dialogue work plan, the fundraising and mobilization work plan, etc.

³ See section 4 for details on what information is made available.

⁴ The Church of Sweden must comply with the Principle of Public access to information (*Kyrkoordningen kap. 53: § 3*). This does not however prevent the confidential handling of sensitive complaints when protection of individuals (*Kyrkoordningen Kap. 54: § 4*) and protection of businesses- and cooperating partners (*Kyrkoordningen Kap. 54: § 7 – 8*) needs to be taken into consideration.

⁵ Act Church of Sweden is currently developing our system and routines for data management. This includes guidelines for staff on what information can or cannot be shared publically, ensuring that we abide by internal rules and national and international laws.

- *Media releases*
- *Campaign and fundraising actions*
- *Published reports and research*
- *Social media (Facebook, Twitter, Instagram and blogs are used mainly to spread information and communicate with target groups)*

Act Church of Sweden conducts evaluations on a regular basis. The terms of reference for each evaluation will specifically state if the evaluation summary report will be made available on our website or if it is an internal document.

4.2 Reporting and membership requirements

Act Church of Sweden International work will meet its contractual and/or membership reporting requirements to our institutional donors, partners, membership and regulatory bodies including the Swedish International Development Agency, the European Commission for Humanitarian Aid and Civil Protection (ECHO), Radiohjälpen, Swedish Fundraising Council, Charter for Change and the Swedish Fundraising Control.

The Church of Sweden International work will also meet its membership requirements such as with the Core Humanitarian Standard Alliance and the ACT Alliance, etc.

4.3 Internal reporting, communication and human resource documents

The Church of Sweden regularly reports to the Church of Sweden General Secretary, the Church Board and the International Commission. The reports cover work carried out according to plan, deviations, contextual analysis and financial results. The reports are available in Swedish on the Church of Sweden intranet and the International Department's information and planning system (Vips Online).

Internal strategic and human resource documents for staff are available in Swedish and English. Information to staff about the organisation, strategy, commitments, operations, programmes, human resource documents and guidelines, support and capacity building opportunities, etc. are available on the Church of Sweden intranet and/or Vips Online.

4.4 Partners and rights holders/target groups

Act Church of Sweden staff are responsible for sharing information with partners about our organisation, strategic plan, commitments, programmes, deliverables, complaints mechanism and codes of conduct during partner and monitoring visits, and by introducing themselves and their roles in Act Church of Sweden in appropriate languages and formats.

Act Church of Sweden staff are responsible for sharing information with the rights holders / target groups they interact with. Information shall be relevant and appropriate to the context and situation. The aim is to provide information on:

- staff member(s) name and roll;
- purpose for the visit;
- Act Church of Sweden's activities in the project and/or area;
- how Act Church of Sweden will use the information gained during the visit;
- how Act Church of Sweden staff should behave;
- how to complain.

5. In partnership

As Act Church of Sweden rarely implements directly there is a chain of quality and accountability that must be respected. In order to ensure the integrity of the partners, use resources effectively and to avoid unnecessary confusion among stakeholders this chain cannot be interrupted.

The different levels of responsibility are set out in Annex 2. The Cooperation and Funding agreements state the undertakings of Act Church of Sweden and its partners and are a basis for ensuring a common understanding. Act Church of Sweden encourages its partners to share information in relevant formats, languages and media with target groups and rights holders.

As per the Cooperation agreement, Act Church of Sweden requires partners to share the following information with rights holders and/or target groups on the partner's⁶:

- organisation;
- relevant project and/or programme;
- staff code of conduct⁷.

Act Church of Sweden encourages partners to share the following information with rights holders and/or target groups on the partner's own:

- commitments;
- information on funders and back donors;
- selection criteria and the participation of the rights holders / target group in the activity;
- contact details;
- regular progress reports;
- basic information on finances and regular financial reports;
- place and date for important events that allow the rights holders/target groups to participate;
- procedure for accepting and handling complaints.

Act Church of Sweden recognises that not all of the above information can or should be shared by the partners due to security, context, legality, confidentiality reasons, etc. Decisions not to share this information are the responsibility of the partner and should be based on an assessment of risk for all parties involved.

5.1 Membership in ACT Alliance, WCC and LWF

The Church of Sweden is a member of the Action by Churches Together Alliance (ACT Alliance), the World Council of Churches (WCC) and the Lutheran World Federation (LWF). These worldwide ecumenical memberships shape the work of the Church of Sweden in various ways.

As a member of the ACT Alliance, Act Church of Sweden is required to abide by the ACT Co-branding policy. As a result, all humanitarian, development cooperation and joint advocacy work are co-branded with the ACT logo.

In specific cases, it may also be more appropriate to share information *only* as the ACT Alliance, LWF or WCC rather than as individual churches or organisations. Such cases include:

- ACT Alliance humanitarian appeals;
- policy dialogue initiatives with the European Union or United Nations;
- bilateral and multilateral programmes or projects financed by ACT members;

⁶ The Cooperation agreement will be revised in 2018 to require partners to share information to rights holders / target groups to ensure informed participation.

⁷ The Cooperation agreement will be revised in 2018 to require partners to “inform staff, target groups and rights holders on how staff need to behave in appropriate format and language.”

- global, regional or country programmes jointly implemented or financed by ACT members.

The Church of Sweden's membership in WCC and LWF, is part of its identity. It is a global fellowship and communion of partner churches, making it broader than the mandate of the ACT Alliance. Thus when working with the WCC or LWF (with the exception of LWF World Service), Act Church of Sweden does not co-brand with the ACT Alliance.

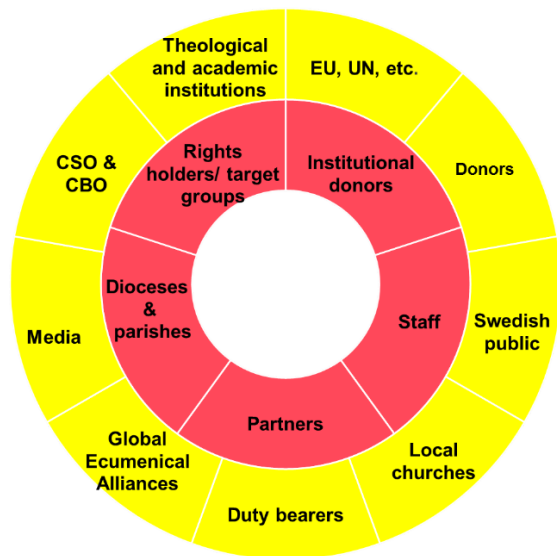
6. Management responsibility

The Director for International affairs, with the support of the senior management team, is responsible for the content and implementation of this Guideline. The Unit for Organisational development and institutional financing is responsible for keeping this Guideline up to date. The Guidelines shall be reviewed every two years.

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Annex 1. Information sharing with specific stakeholders

Act Church of Sweden’s core stakeholders are the inner circle of the diagram below. This Guideline provides details the specific information that we provide to the core stakeholders, in particular rights holders / target groups, institutional donors, staff, and partners. Stakeholders in the outer circle have access to basic information via our website and other information through contact with staff members. Act Church of Sweden endeavours to ensure that all basic information is available in Swedish, English and Spanish and all internal strategic and human resource documents relevant to staff are available in Swedish and English.



Annex 2: Lines of responsibility on information sharing.

