

Date Approved: 12 September 2023  
Date Entered Into Force: 12 September 2023  
Next Review Date: Q3 2025

# UNCAC Coalition

## Transparency Policy

The UNCAC Coalition (the Coalition) promotes transparency and accountability and seeks to lead by example. In line with international standards, the Coalition will release information proactively or by making information held by the organization available upon request.<sup>1</sup>

Information held by the UNCAC Coalition is assumed to be public but limited exceptions will be applied to protect legitimate interests, in line with exceptions in the [Council of Europe Convention on Access to Official Documents](#). The application of those exceptions will be subject to a harm test and a public interest test<sup>2</sup> on a case-by-case basis.

### Proactive Publication

The proactive publication of information by the UNCAC Coalition is designed to inform our membership, stakeholders and the public of the work that we do. To facilitate our own accountability, in addition to releasing news on ongoing activities and projects, the UNCAC Coalition proactively publishes the following information on its website within 10 working days of a document being completed (or updated):

- UNCAC Coalition Charter;
- A link to the current certificate of the Coalition's legal registration;
- Regularly updated list of all members (organizations and individuals), and affiliated groups that are part of the Coalition's network;
- Information about our staff, including relevant biographies and contact information;
- Information about our governance structure and relevant processes, such as board elections, members of our board – the Coalition Coordination Committee (CCC) – including biographies, as well as interest disclosure forms;
- Governance-related documents including relevant policies and summaries of meetings of the General Assembly and of the CCC;
- An updated list of donors and funds received from each donor in a calendar year;
- Annual activity reports;
- Current Strategy of the Coalition;
- Audit reports with detailed annual accounts;
- Program and project evaluation reports;

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<sup>1</sup> Note: The Transparency Policy of Access Info Europe served as an inspiration for this policy: <https://www.access-info.org/access-info-transparency-policy/>.

<sup>2</sup> The harm test evaluates if and what harm would be caused by the release of requested information. The public interest test evaluates the public interest in the information being released, and if this interest would justify any harm caused by the release.

- Information held on the status of national UNCAC reviews including final documents obtained by the Coalition from UNCAC reviews that are not otherwise publicly accessible;
- Information on UNCAC events, including the biannual Conference of the States Parties and the annual UNCAC NGO briefing, as well as on events, statements and submissions made by the Coalition and its representatives;
- Information on the Coalition's activities and projects, including
  - guidance documents on the UNCAC and its mechanisms;
  - civil society parallel reports supported by the UNCAC Coalition;
  - signatories to the Transparency Pledge;
  - working group activities and outputs;
  - summaries of regional meetings;
  - civil society briefing blog post; and
  - other similar documents;
- Editions of our newsletter.

Any documents which are not published proactively can be requested. If a requested information is of wider public interest or has been requested twice, the information will also be published online.

If you are not satisfied with the proactive publication by the UNCAC Coalition, you may write<sup>3</sup> to the Managing Director. You may use the appeals process to the CCC below if you are not satisfied with the response provided by the Managing Director.

## Open Data

We endeavor to release information and documents in an easily-accessible format. To this end, we almost always upload documents in PDF formats as well as in Word format or Google Doc, whenever we have the documents in these formats.

We also make available structured data in spreadsheet formats (Excel, Google Sheets or similar) that allow users to download and use the data. Datasets linked to map visualizations on our website are generally accessible through the map itself, and where not, can be provided upon request.

If you should come across a document which you cannot open, please let us know, and we will happily send it to you in another format wherever possible.

Content produced by the Coalition that is published proactively is released under an open licence (restrictions may apply to some content produced by third parties used by the Coalition) and may be reused by anyone who receives that information. We encourage reusers of the information to state the source.

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<sup>3</sup> You can find the email address here: <https://uncaccoalition.org/about-us/team/>.

## Requests

Any natural or legal person from any country may submit a request for documents or information to the UNCAC Coalition.

Send your request to [info@uncaccoalition.org](mailto:info@uncaccoalition.org), please use the subject line: "Request for Documents/Information". Should you prefer to make the request by post, you may do so by writing to our postal address, which can be found [on our website](#).<sup>4</sup>

Please provide us with, preferably, an email address or, if you prefer, a postal address to which we can send you a response.

Requests may be made in English, French, Spanish or German. We may be able to process requests in other languages using machine translation. Our documents are primarily in English with some also available in French, Spanish, Arabic and/or German. We do not have the resources to carry out translations but may be able to provide a machine-translated version of the information.

The Coalition is committed to honour requests for documents or information by providing it in the requested format (whether electronic or print). To the extent that the requested information can easily be generated through an automated process, such as extracting it from a database, we will endeavour to do this. The Coalition is not, however, obliged to create new documents in order to fulfil a request.

Please specify as clearly as possible the information or documents you are interested in receiving. If you are not sure how to formulate your request you may contact us by any of the means above or via telephone<sup>5</sup> to discuss the request. If your request is not clear to us, we will contact you within five working days of receipt of the request to clarify. The time for the Coalition to answer your request will be suspended until you have replied to the clarification request.

We will acknowledge your request within three working days and provide the requested material within 10 working days. If this is not possible, a one-time extension of up to 15 working days may be applied, upon notification to the requester and with an explanation as to why this is necessary.

Access to information or documents may be refused if its disclosure would or would be likely to harm any of the interests mentioned above, unless there is an overriding public interest in disclosure.

Legitimate exceptions:

- The privacy rights, personal data protection and other legitimate private interests of individuals;
- The legitimate interests of legal persons;

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<sup>4</sup> Find our contact information at <https://uncaccoalition.org/impressum/>.

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- Negotiations in which the Coalition is engaged or contributes to, including with or among governmental bodies, and multi-lateral organisations;
- Harm to international relations;
- Internal staff processes, including reviews and disciplinary investigations;
- Protection of whistleblowers;
- Decision making by the Coalition and its governance bodies.

Partial access: Where only part of a document falls within the scope of an exception, the rest of the document will still be disclosed.

To the extent that access to all or part of a document is refused, the refusal letter must explain how in that particular case the release of the information/documents would damage the protected interest and explain why there is no overriding public interest in making public the information. The refusal letter must be signed by two senior members of the UNCAC Coalition team. Letters accompanying a disclosure will be signed by the Managing Director or a designated UNCAC Coalition team member.

When refusing access to all or part of a document, the refusal letter must provide an estimate of the time for which the refusal will last and when a new request can be submitted. This may never be more than a five-year period.

The refusal letter must state the appeals procedure.

A request for access to an official document may also be refused:

1. If, despite the assistance from the UNCAC Coalition team, the request remains too vague to allow the information or relevant documents to be identified; or
2. If the request is manifestly unreasonable.

## Appeals

If you are not happy with the way your request has been handled or with the response you have received, you may appeal to the UNCAC Coalition.

An appeal must be submitted within 20 working days of receipt of a response from the UNCAC Coalition.

The process is to send an email to [info@uncaccoalition.org](mailto:info@uncaccoalition.org) or to send a letter to our postal address.<sup>6</sup>

Appeals will be decided upon by the CCC Chair or a Vice-Chair, following consultation with relevant staff members, within 10 working days. A one time extension of up to another 15 working days may be applied, in which case the applicant will be notified before the initial 10 working days have expired. In extraordinary circumstances, the deadline may be extended further if both parties consent to an extension beyond 15 working days.

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<sup>6</sup> Find our contact information at <https://uncaccoalition.org/impressum/>.