

Transparency and Accountability Policy

1. Purpose

This policy sets out the British Red Cross' (BRC) position in relation to transparency and accountability: how we will voluntarily publish information relating to our structure and operations to enhance transparency and enable our stakeholders to evaluate our performance. It also provides how we will respond to ad hoc information requests.

2. Scope

This policy applies to: (i) all our people, (ii) information related to BRC's governance, structure, management and operations both in the UK and internationally and (iii) public disclosures, stakeholder engagement and responses to information requests.

3. Policy Statement

We are committed to ensuring transparency and accountability to all our stakeholders – those who use our services, those who deliver them, and those who fund them.

This commitment is primarily shaped by the BRC's legal obligations arising from its status as a registered charity.

Whilst the BRC is generally not subject to the provisions of the Freedom of Information Act 2000 (UK) we uphold its principles and comply with the Data Protection Act 2018 (UK).

Where there are legal, ethical and security considerations that may limit the disclosure of certain information, we will ensure decisions are made transparently, recorded appropriately and reviewed periodically to uphold our accountability commitments.

To achieve this, we commit to:

- 3.1.** Voluntarily publishing and regularly updating information on the BRC external website in relation to our structure and operations, including, but not limited to, policies, reports, evaluations, and the standards and codes of conduct we are committed to. All information we commit to publishing is listed in the Transparent and Accountability Policy: Annex.
- 3.2.** Demonstrating accountability to our stakeholders for how we use resources (financial and otherwise) to deliver the objectives set out in our corporate strategy, including in our annual Trustee Report and Accounts.
- 3.3.** Providing funders with relevant information to support their evaluation and reporting.

- 3.3.1.** This includes publishing data on all our international grants (including from the UK's Foreign, Commonwealth and Development Office) on the publicly accessible International Aid Transparency Initiative (IATI) registry.
- 3.4.** Releasing and sharing information in the public interest, unless it risks:
- i. Disclosing information not authorised, as per Section 3.5;
 - ii. Jeopardising the safety and security of our people, those who use our services or our operations;
 - iii. Breaching legal or confidentiality requirements;
 - iv. Causing detriment to our operations on commercial sensitivity grounds;
 - v. Compromising the integrity and effectiveness of internal controls, administration and management processes, in which case we reserve the right to limit sharing of some information;
 - vi. Incurring in considerable costs (including staff time) and therefore diverting resources away from our charitable aims.
- 3.4.1.** We also reserve the right to refuse unreasonable, repetitive or malicious requests.
- 3.5.** Responding to ad hoc requests for information. This will be done in accordance with the categories of information as set out in the Information Classification Policy, ensuring transparency while safeguarding confidentiality and legal requirements:
- i. Public Information (Level 0): can be disclosed immediately.
 - ii. Internal Use Information (Level 1): will be assessed as to whether it can be released in the interests of transparency and accountability. Redactions may be applied where necessary. Approval for release must come from Heads of Department or Service (Level 6 staff or above), and notifications should be sent to the Information Governance team.
 - iii. Confidential Personal Identifiable Information (Level 2): will only be disclosed following approval from the Information Governance team, in line with the Data Protection policy. Notifications should be sent to the Information Governance team.
 - iv. Confidential Corporate Information (Level 2) corporate information: will only be disclosed if authorised by a member of the Executive Leadership Team; this includes information required by law.

- 3.5.1.** In circumstances where BRC is delivering services through contract and on behalf of public sector partners, information we hold in relation to these services may be subject to Freedom of Information (FOI) requests. Where we act as data processor, we will support the relevant public sector partner in responding to such requests in line with legislation. Where we act as data controller, we will assess each request on a case-by-case basis, considering legal obligations, potential risks (including reputational risk, risks to staff and volunteers, and risks to service users), and our policies before determining our response.
- 3.5.2.** While we are committed to transparency, certain requests – particularly those related to criminal investigations or under UK criminal legislation – are subject to legal and regulatory frameworks. In such cases, consultation with the International Law and Policy team is required before disclosure.
- 3.5.3.** Records of decisions regarding the release of information will be kept centrally by Information Governance team.

3.6. Lessons Learned from Policy Evaluation

A review of this policy was undertaken with comprehensive consultation involving stakeholders from across the organisation (International Law, Information Governance, People, Safeguarding). Changes include Policy and Procedure Framework compliance (list of documents we are committed to publishing has been transferred to the Transparent and Accountability Policy: Annex), content updated including to meet current sector best practice and legislative compliance, clarification of provisions, organisational positions and practice, as well as the documents we are committed to publishing externally.

4. Responsibilities

The Board of Trustees (BoT) is ultimately accountable for this policy.

The Executive Leadership Team (ELT) are responsible for implementation of, and compliance with this policy in Directorates and teams, championing this policy and approach to transparency and accountability within their Directorates.

The Chief Executive (Policy Owner) is the Executive Leadership Team member responsible for this policy on behalf of the board, ensuring that the organisation achieves external and internal standards set out in this policy.

The Regulatory and Reporting Manager together with the Policy Owner, is responsible for the development, implementation, communication, monitoring, and review of this policy.

All our people are responsible for adherence to this policy.

5. Governance

Associated policy document/s	<ul style="list-style-type: none"> • Information Governance Policy • Data Protection Policy • Information Classification Policy • Confidentiality Policy • Code of Conduct • Overarching Ethical Policy • Evaluation and Research Policy 	
Policy(ies) superseded	N/A	
Legislation/ regulatory requirements and standards	<ul style="list-style-type: none"> • Freedom of Information Act 2000 (UK) • Data Protection Act 2018 Disclosure Procedure: Confidentiality and Disclosure under Section 38B of the Terrorism Act 2000. • Lawful Enforcement Agency Disclosure Request Procedure • Subject Access Request Procedure • Companies Act 2006 (UK); and People with Significant Control • Regulations 2016 (UK) • Health and Social Care Act 2008, Regulations 2014 (UK) • Modern Slavery Act 2015 (UK) 	
Equality impact assessment	No equality impact identified	
Data Protection impact assessment	No data protection impact identified	
Environmental impact assessment	No environmental impact identified	
Approval Authority; Approval date	ELT, May 2025	
Policy Owner	Chief Executive	
Policy Lead	Regulatory Reporting Manager	
Date effective	05 2025	
Interim update date	N/A	
Review date	05 2028	
Version	4.0	
Keywords	transparency, accountability, integrity, clarity, privacy, confidentiality, governance, structure, operations, reports, responsibility, reputation, conduct, standards, decision-making, compliance, best practice, GDPR, information governance, grants, evaluation, donations	
Revision history	Version	Summary of change (s)
	1.0	New Policy (September 2016)
	2.0	Scheduled review: Amends to ensure policy is fit for purpose, including Appendix 1 additions – documents we are

		committed to publish (July 2019)
	3.0	Scheduled review: Amends to ensure data protection obligations are correctly addressed and current authorisation needs are reflected. (May 2022)
	4.0	Scheduled review: Policy and Procedure Framework compliance, updates including to meet current sector best practice and legislative compliance, clarification of provisions, and organisational positions and practice.

Appendix: Definitions

Data Controller: Who determines the purposes and means of the processing of personal data, making decisions about processing activities and overall control of the personal data being processed.

Data Processor: Who processes personal data on behalf of the controller, acting under their authority, serving the controller's interests rather than their own.

International Aid Transparency Initiative (IATI): IATI is a global initiative to improve the transparency of development and humanitarian resources and their results to address poverty and crises. IATI provides a single point of access for data published in the IATI format, called the IATI Registry. (<https://iatistandard.org/en/>)

Our People: All BRC staff, volunteers, including office holders, consultants, contractors, and third-party organisations contracted to work on behalf of the BRC in the UK and internationally.

Personal Identifiable Information: Any information that can be used to identify an individual, such as name, email address, date of birth etc.

Transparency: The provision of accessible and timely information to stakeholders and the opening up of organisational procedures, structures and processes to their assessment.