



*Growing  
Together  
in Solidarity*

## Information Disclosure Policy 2022

### *Caritas Nepal*

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**First  
Edition**

# CARITAS NEPAL

## INFORMATION DISCLOSURE POLICY



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**2022 (v.1)**

## Introduction

Caritas Nepal (CN) is an authentic, transparent and responsive organization. We are a committed team where we uphold our decisions and activities in professional and ethical standards of accountability in accordance with Caritas Internationalis Management Standards (CI MS) and Core Humanitarian Standards.

Complying with National laws and guidelines as per the information disclosure for Non-Governmental Organizations, now information disclosure policy can potentially be viewed on our website. CN strongly believes that transparency leads to greater accountability therefore information must be accessible and disclosed, subject to limitations outlined in the policy. CN adheres to all information held by this policy. However, this policy is not applicable to information held by individual partners of CN but we believe that our partners have similar policies that meet the legal requirements of their own country and that of their stakeholders.

As a Member Organization of *Caritas Internationalis*, CN is responsible to make accessible public information regarding our programmes and operations, and we highly consider public access to information as an integral component of effective participation of all stakeholders especially for our beneficiaries (CI MS, article 4.8). This concise policy must be 'easily accessible' to our stakeholders and beneficiaries, who can obtain intelligible information about CN – who we are; how and where we work; and our overall financial position.

Our Information Disclosure Policy, therefore, seeks to ensure that information related to structures, policies and activities of CN are available to our stakeholders especially to those individuals or community whom we support in our humanitarian, development and advocacy work. CN truly believes such transparency will demonstrate proper management of resources.

Regarding the vision, mission, activities and financial situation of CN the staff, volunteers and interns are well informed so as to understand their responsibility and be respectful in their employment (Caritas Internationalis Code of Ethics & Code of Conduct of Staff).

The principles and procedures in relation to internal and external communications of CN are addressed in our communication policy.

## Purpose of the Policy

To understand the purpose of this policy, 'information' means any content in paper, electronic or other medium concerning a matter related to CN.

CN is registered as a Non-Governmental Organisation under Nepal's District Administration Office, Lalitpur, with the registration no: 85/047/48, and in accordance with the Society Registration Act 2034 B.S, and is therefore guided by Nepal's law in relation to public information disclosure. This policy is therefore subjected to Nepalese data protection and privacy legislation. Accordingly, CN will not disclose data, information, or photographs about individuals which is prohibited under applicable law, or where it is considered as restricted information.

## Scope of the Policy

This policy applies to the entire organization including Head Office of CN in Kathmandu and in all its Regional Offices, District Offices and Project/Programme or Field Offices and any other entity under the management and operation of CN (presently existing or to be established in future) which clearly implies that it is applicable to all staff (including temporary or part-time), volunteers, interns, General members and board members. This policy also extends to the associates of CN who are or will be involved in our operations or shall represent us or act on our behalf.

The Executive Director (ED) is supported by a unit/team assigned for management of communication functions in Caritas Nepal, referred here as 'communication department', it shall be responsible for interpretation and implementation of this policy which includes monitoring on a regular basis. All staff members and associates are required to get familiar with this policy thoroughly and adhere to the provisions stated in this document. All communication to the public should be through the communication officer and Executive Director.

Caritas Nepal will periodically review this policy as required. The Executive Committee will have the authority to revise this policy with approval from the General Assembly.

This policy will be implemented in conjunction with other policies and guidelines, facilitating the implementation of this policy, presently in existence or to be enacted in future. Henceforth, this policy shall be read in conjunction with all those relevant documents.

These entail (but not limited to):

1. Code of Conduct (2020)
2. Anti-Corruption Policy (2019)
3. Finance Policy Manual (2016), Updated (2021) - Referred to as 'Caritas Nepal Finance Policy'
4. Human Resource Management Policy and Procedures (2016), Updated (2021) - Referred to as 'Caritas Nepal Human Resource Policy'
5. Complaints Handling Policy and Procedures (2020)
6. Social Protection and Safeguarding Policy (2020)
7. Programme Management Guidelines (2021)
8. Environment and DRR Policy (2020)
9. Information and Technology Policy (2021)
10. Communication Policy (2021)
11. Risk Management Policy (2021)
12. Organisational Sustainability Policy (2021)

These mentioned documents are available on [www.caritasnepal.org](http://www.caritasnepal.org)

## Public Information

CN continuously aims to ensure good public information and documentation, and most of our publication materials reflect information related to our work which can be viewed on our website – [www.caritasnepal.org](http://www.caritasnepal.org) – some of the public information materials are as follows:

### About Caritas Nepal

Our website provides an overview of who we are, what we do and where we work. The following documents and information are available on our website -

- Strategic frameworks of Caritas Nepal which gives an idea on how we do our work
- Values, vision and mission of CN
- Monthly updates on economic, social and humanitarian initiatives of CN
- Links to publication materials of our projects
- Annual report including a financial report that showcase operations - income and expenditure of CN

### Governance and Management

Caritas Nepal publishes the list of board members however personal details i.e., contact details will not be provided. On the other hand, the name list of all staff members is publicly available along with their email and phone number details. But, agendas and minutes of board meetings are not made public.

### Evaluations and Learning Studies

All evaluations and learning studies conducted by consultants and other external parties in or after 2016 are published on our website and shared within our network via intranet Baobab.

These publications are governed by the provisions as specified in Section 5, which includes cases where the content is assessed, potentially put involved parties at risk or harm the reputation of partner organisations, individuals or other stakeholders. In such circumstances, sensitive information will be redacted for public or general viewers. However, excerpts of key lessons learnt, successes and failures during the evaluations and learning studies will be shared with donors in our progress report.

## Sharing Information with Communities

All partners of Caritas Nepal are accountable to their own governance structures.

CI Member Organisations, when delegating implementation of activities to partner organizations will ensure through contractual arrangements that the CI Management Standards (CI MS) is applicable to the implementing partner. CN is thus obligated to ensure that our local and national partners have similar mechanisms on information sharing at the project and programme level:

- *When project planning and implementation is done by or in collaboration with other parties, in the first place, diocesan Caritas organizations (where applicable), the Member Organisation ensures that these projects are carried out in accordance with the current*

*management standards, not only by written agreement but also by monitoring actual capacities and work of these partner organizations. (CI MS, article 1.8.1)*

### Transparency and Accountability

The CI MS commits Member Organizations to ensure that partners and other stakeholders have access to timely, relevant and clear information about the organization and its activities, as stated in the following articles in the CI MS:

- *The Member Organization subscribes to authentic partnership which is characterized by: honest feedback and joint planning, accompaniment, transparency and accountability on both sides, and a genuine openness and sensitivity to the other's needs, feelings, expertise, experience and wisdom (CI MS, article 1.6.1)*
- *Member Organizations have a clear and transparent methodology of communicating with all stakeholders through (where possible publicly obtainable) appropriate information (CI MS, article 4.1)*

### Feedback and Complaints

The CI MS additionally promotes access to information on procedures for communities to give feedback or complaints.

- *Member Organizations have a Complaints Handling Policy as a formal appropriate feedback mechanism that is discussed and agreed with key stakeholders and publicly communicated (CI MS, article 1.7)*
- *The Member Organisation aims to improve policy and practice in the areas of governance and leadership, as well as on accountability and transparency. For this purpose, the Member Organisation invites stakeholders to inform them about their performance in the form of an official and written complaints handling procedure (CI MS, article 1.7.1)*

For the communities to give feedback or complaints, it is important that they are aware of what they can expect from the staff of the implementing partner organization as well as regarding deliverables from the project. For this reason, implementing partner organizations are expected to share with communities their organizational commitments expressed in their Code of Conduct and/or Code of Ethics. This must comprise commitments against sexual exploitation and abuse in line with the CI Code of Ethics.

The “Good Enough Guide” in the CI Toolkit provides a checklist (Tool 2) that partner organizations are expected to abide to and in sharing of information to communities regarding the project they are benefitting from. This resource also provides a “need-to-know” checklist (Tool 1) for use by the implementing partners to ensure that their staff are adequately informed to answer what additional information the communities might request for.

### Stakeholder Involvement

The CI MS commits the Member Organizations to involve communities and beneficiaries in all possible levels of planning, implementing, monitoring and evaluation processes:

- *The Member Organization involves beneficiaries in their needs assessment, and subsequently in the project planning process (CI MS, article 4.4.1)*
- *The Member Organization ensures that the beneficiaries are actively involved in the implementation process, e.g., through committees, at least at the level of consultation*

*and preferably - and where possible - at the level of decision-making (CI MS, article 4.5.1)*

- *The Member Organization's monitoring and evaluation procedures requires the involvement of: the Board and staff of the organization, local partners and other stakeholders (government, donors, other implementing agencies, research institutions, etc.) in the M&E process (CI MS, articles 4.6.4 - 4.6.6)*

## **Restricted Information**

Not all information is made public. In order to preserve the interests of CN and of its partners, there are legal, operational and practical considerations to uphold certain information. Information under these categories is considered as confidential and not available for public/general audience.

- Information whose disclosure is likely to endanger the safety or security of any individual, violate his or her rights, or invade his or her privacy, e.g., during crisis or when living under suppression
- Information whose disclosure is likely to endanger (staff of) the organization, or the security of CN's partners, or prejudice the security or proper conduct of any operation or activity of CN
- Intellectual property or other information provided to CN on condition of confidentiality
- Information covered by legal privilege or under negotiation, including disciplinary and investigative information or related to access to internal audit reports
- Advocacy, communication and fundraising strategies, which would be compromised if made public before they were implemented, or possibly put CN's competitiveness at risk

Information on CN's internal administration or operating systems is available on request from the Director that's subjected to the limitations outlined above.

The board is ultimately responsible for making decisions on CN's open information boundaries. It is responsible for approving and ratifying any policy decisions in relation to this policy, and for supervising the implementation of this policy in cooperation with the Executive Director. The Executive Director is responsible for making decisions on specific information requests from the public during the board meetings.

## **Copyright and Disclaimer**

All information and material posted on [www.caritasnepal.org](http://www.caritasnepal.org) are subject to CN copyright. CN takes no responsibility for the content or information posted on other linked websites, nor does it exert any editorial or other control over those sites. No representation is made or warranty given, express or implied, as to the completeness or accuracy of information made available by CN. The requestor shall apply discretion when using the information made available by CN. CN will not be liable for any direct or indirect loss arising from the use of the information.

## **Information Requests**

If the information is not available on the CN website, [www.caritasnepal.org](http://www.caritasnepal.org) then the public can contact the Executive Director to get it. Any inaccuracies or incorrect information in our public documents can also be reported to the Director. All media enquiries should be handled by the Director.

Additionally, individual staff email addresses/contact numbers can be found on [www.caritasnepal.org](http://www.caritasnepal.org) depending on the nature of the information required. Request for information can also be made via post or telephone at the following address:

Caritas Nepal

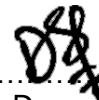
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*All requests will be responded within 30 days or whenever possible.*



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Sr. Durga (Cecilia) Shrestha  
President  
Caritas Nepal  
24 September 2022