

**Information Disclosure Policy
Of
Social Development Foundation (SDF)**

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A. Preamble

With the vision to eradicate poverty through sustainable development and women empowerment, Social Development Foundation (SDF) helped improve the lives and livelihoods of over 6 million poor people in its working areas and could break the intergenerational cycle of inequity and poverty. The organization has completed more than 15 years of its development efforts among the outreach through self-governed community institutions—the Social Investment Program Project (SIPP). SDF-supported initiatives took a targeted approach, prioritizing those most in need (the poor and extreme poor, women and vulnerable communities) and gained increased stature at community development and in finding its niche intervention and adjustments.

Born in 2000 as an autonomous and “not for profit” organization by the Government of Bangladesh, it was registered under the Companies Act-1994 on July 28, 2001. Since its inception, SDF has grown to become one of the most successful organizations in Bangladesh in poverty alleviation. SDF enriches and sustains the lives and livelihoods of Bangladesh’s excluded hardcore poor and poor through an integrated program of empowerment, capacity building, finance and social investment.

The recent initiatives of SDF at redefining its mission and strategic approaches enabled it to make a significant progress. Concurrently it has been navigating prosperity and catalyzing efforts towards establishing strong and equitable society. In July 2015 the “Nuton Jibon Livelihood Improvement Project (NJLIP)” has been launched with a budget of US \$ 220 million for a time span of six years. SDF envisions working with about 8.5 million households categorized as poor and hardcore poor with a goal to reduce poverty and to improve their livelihood.

B. Rationale of the Information Disclosure Policy

SDF maintains highest level of accountability, transparency and integrity in all its activities. It is committed to uphold all kinds of rights of its stakeholders and the citizens of the country as per the law of the land. In line with its core values, SDF has decided to disclose its information related to its policies, procedures, programs, and activities as per section 2(2) (5) of Right to Information act, 2009 (herein after referred to as RTI act, 09).

C. Declaration of the Policy

1. The Information Disclosure Policy of SDF (hereinafter referred to as IDP) is the first step of its readiness towards meeting up the people’s requirement of information. According to the IDP, SDF shall classify its information as proactively disclosed, and to be provided upon request. Some information will also be classified as confidential by the management of SDF under section 7 of RTI act, 09. Confidential information will be kept undisclosed.
2. SDF offices operating at all level, and all programs and activities will be under the jurisdiction of IDP.

3. The IDP will be reviewed periodically by the Working Committee (WC) and the WC will provide suggestions for amendment, if necessary.

D. Effective Date

The IDP has been approved by the Governing Body of SDF on 07 August, 2014 in its 87th general meeting and has taken effect from the date of obtaining approval.

E. Overriding effect of the policy

1. If any of the provisions of other existing policies or rules of SDF creates hindrance in disclosing information, and/or conflicts with any of the provisions of the IDP, the IDP shall prevail; and,
2. If any of the sections of the IDP contradicts with RTI act 09, the RTI act, 09 shall prevail.

F. Definition

The following words and expressions in the IDP will have the following meanings, unless a different intention appears from the subject or context:

- (i) Information: For the purpose of this policy, information is defined as printed or electronic materials that provide knowledge about SDF's activities, including programs and operations and knowledge products produced by SDF. "Information" includes any memo, book, design, map, contract, data, log book, order, notification, document, sample, report, accounts, project proposal, photograph, audio, video, drawing, painting, film, any instrument done through electronic process, machine readable record, and any other documentary material regardless of its physical form or characteristics, and any copy thereof in relation to the constitution, structure and official activities of SDF".
- (ii) Information Providing Unit (IPU): National, Regional and District offices of SDF where:
 - a. District level office will cover the information generated at cluster level offices under the purview of respective district office along with the district office itself;
 - b. Regional level office will cover the information generated at the cluster and district level offices under the purview of respective regional office along with the regional office itself;
 - c. National office will cover all information generated in SDF.

- (iii) Designated Officer (DO): Administrative heads of district, regional and national level offices of SDF designated for implementing the IDP as per following:
 - a. District Program Manager (DPM), administrative head of district office, will be assigned as the Designated Officer for District IPU;
 - b. Regional Program Director (RPD), administrative head of district office, will be assigned as the Designated Officer for Regional IPU;
 - c. Managing Director (MD), administrative head of SDF, will be the Designated Officer for National IPU.
 - d. If necessary, the DO may seek assistance to any concerned staff member and will be assisted thereof for providing information.
- (iv) Information Seeker (IS): Any citizen of Bangladesh seeking information from SDF that falls within the authority of SDF.
- (v) Appellate Authority: There will be two tiers of Appellate Authorities in SDF as follow:
 - a. The Regional Program Director (RPD), administrative head of regional office, will be the Appellate Authority for the District IPU for districts within the responsibility of the RPD;
 - b. The Managing Director or his/her delegated authority at the national office will be the Appellate Authority for the Regional IPUs.
- (vi) Working Committee (WC): A national level committee termed as WC shall be constituted by the management of SDF within 01 (one) month of approval of the policy. The WC will be headed by Director/GM (G&A)/(HR) and 04 (four) other appropriate senior officials of SDF to undertake the responsibilities as mentioned in the section (T) of the IDP.
- (vii) Third Party: Village Organizations or any other organizations emerged under the patronization of SDF with whom Project Contract/ agreement/ MOU or TOR is made.
- (viii) Information Commission (IC): IC is an independent statutory body of the Government of Bangladesh (GoB), which is formed by section 11 of RTI act, 09.
- (ix) Application: Information Seekers will request for particular information to the DO using a prescribed format developed by SDF (Annex 1.0) in line with the gazette of GoB published by the Ministry of Information (MoI) dated 01 November, 2009.
- (x) Appeal Application: An Information Seeker whose application has been rejected by the DO may lodge an appeal to the appellate authority using a prescribed format developed by SDF (Annex 2.0) in line with the gazette of GoB published by the Ministry of Information (MoI) dated 01 November, 2009.

G. Categories of Information

1. Information, according to the definition delineated in the sub-section F (10) (i), generated by SDF will be classified according to following categories:
 - a. Category 1: Proactively disclosed information
 - b. Category 2: Information to be provided on request
 - c. Category 3: Information to be kept undisclosed
2. Since SDF consists of 6 (six) departments, namely; Programs, Human Resources, Administration, Finance and Procurement, Monitoring Evaluation and Learning, and Governance, the respective departments, under the guidance of the management and with assistance of WC, shall categorize and shall make index of all types of information. The index will be updated every 6 (six) months. The updated index will be published according to their category (Category1 & 2) on the official website of SDF and will be sent to the IPU in hard/ soft form.
3. SDF management will determine which type and volume of information to be kept undisclosed (Category 3); such as personal information of the staff members, ongoing departmental actions etc. An index of such information will be prepared. The index will be reviewed yearly and be sent to the IPU in hard/ soft form but be kept unpublished.

H. Proactive Disclosure of Information

1. SDF shall categorize a bunch of information to disclose proactively (Category 1). SDF official website (www.sdfbd.org) will be a significant medium of information disclosed proactively, which will be maintained by its IT (Information Technology) and IEC (Information Education and Communication) departments in coordination with the WC. Print medium will be another way to disclose information proactively, which encompasses yearly/ half-yearly report, news bulletin, leaflet, handbill, Community Operational Manual etc. that printed by SDF.
2. Each offices of SDF at cluster, district, and regional levels shall set up display boards at the office premises containing pertinent information generated under the purview of that office. The display board will also contain name, contact/ fax number, and email address of the concerned Designated Officer along with necessary instruction about the procedure of applying to obtain information using RTI act, 09 and the procedure to appeal. The display board will be updated as and when necessary. The administrative head of respective offices will be responsible for ensuring the preparation and updating of the display board at his/her office.
3. Following Information shall be disclosed proactively:
 - i. vision, mission and general information of SDF
 - ii. general information regarding General Body;

- iii. general information regarding Board of Directors;
 - iv. contact details with email IDs of key staff members;
 - v. ongoing activities, initiatives and programs of SDF;
 - vi. geographical and demographical information of project implementation areas;
 - vii. grant information;
 - viii. organogram and structure of SDF;
 - ix. information of beneficiaries;
 - x. program report;
 - xi. various program manuals;
 - xii. funding and disbursement guidelines;
 - xiii. training calendar;
 - xiv. all sort of publications;
 - xv. audit reports;
 - xvi. various success stories and case studies;
 - xvii. selected photographs and video documents; and
 - xviii. any other document that SDF management considers to publish proactively will be included with the list.
4. Separate lists of Designated Officers and Appellate Authorities along with their contact/ fax numbers (if available), email addresses and posting places, Application and Appeal formats (in downloadable form) will also be published and updated on the official website of SDF. Approved Information Disclosure Policy will also be published on the official website along with its implementation status which will be updated in every six month.
5. No application will be required for obtaining proactively disclosed information under following cases:
- a) If the requested information is published in the official website of SDF;
 - b) If any printed material contains the requested information which was published by SDF;
 - c) If the respective IPU and/or any of the offices under its purview is the source of information requested for, which is classified under Category 1.

I. Information to be provided on request

1. Information Providing Unit (IPU) shall be responsible for providing information/ document generated at that office and/ or at any of the offices under its purview. Otherwise, it will send formal request letter or email to the DO of concerned office, where the information/ document generated and/ or the office holds the responsibility to preserve the information/ document, within the stipulated time frame mentioned in section (P) of the IDP.
2. The DO, who will be requested, shall respond immediately after receiving such letter/ email. In this connection, the WC will prepare an authorization of information list and will send to all IPUs.

J. Mode of providing information

Information could be obtained by physical inspection, taking note, photocopy, print-out, hard copy and CD form. Where access to the record or a part thereof is required to be provided to a person with disability, the DO with the help of an expert (depending on availability) will provide assistance to him/her to enable him/her to access such information.

K. Providing certain types of information not mandatory

Application for information under the IDP may be rejected in following cases:

1. Village Organization (VO) or PNGO's rejection for fund availability cases are not open for public and it will be disclosed only to the party involved, donor and other authority to which SDF is reportable legally;
2. Information which has direct link with the followings is deemed confidential and will be kept undisclosed;
 - a) Information related to SDF's National, Regional, District, Cluster or Service Provider/ Partner Organization's staff or individual salary, benefits, TIN, and personal confidential information;
 - b) Information received from and sent to the third party under the expectation of confidentiality;
 - c) Information whose disclosure is likely to endanger the security of state or prejudice the security or proper conduct of any operation or activity of SDF;
 - d) Information covered by legal privilege;
 - e) Internal inter-office or intra-office correspondence, including e-mails and draft documents;
 - f) Information where disclosure would harm either the financial interests of SDF or those of other parties involved;
 - g) Information related with third party whose disclosure is likely to endanger the Intellectual Property thus may occur financial or commercial lose;
 - h) Information relating to incomplete recruitment;
 - i) Information relating to incomplete or undone procurement.

L. Preservation of Information

All IPU's of SDF shall prepare index of information within earliest possible time of taking effect of the IDP and preserve in soft form and/or hard copies as necessary, which will be updated on regular basis.

M. Language

1. The information will be available in at least one of the two working languages of SDF (English and Bengali), depending on the department/IPU publishing/ preserving the information. SDF will provide or disclose information as it is published, printed or stored. Hence, SDF shall not be responsible to translate any information to provide or to disclose to the IS.

2. Original version of the Information Disclosure Policy will be in English and there will be reliable translated version in Bangla. In the case of any conflict between the Bangla and English versions, the English version shall prevail.

N. Application Procedures

1. Information Seeker (IS) may apply to the DO requesting for information either in writing or through email/ fax. The IS shall include the following information;
 - (i) Name, address of the IS, in applicable cases, his/her fax/ phone number and email address;
 - (ii) Correct and clear description of the information sought for;
 - (iii) Other related information so that the location of the information sought for may be easily found out;
 - (iv) Description of the modes how s/he wants to have the information, namely making inspection, having copy, taking note or any other approved method.
2. The request for information shall be made in the Application form printed by SDF. In case of unavailability of such form, request may be made for information by inserting information mentioned in sub-section N (26) on a piece of white paper, or through email/ fax.
3. When an Information Seeker (IS) requests for information, DO shall provide the IS with acknowledgement slip or email response and shall act as per section (P) along with section (O) and section (Q).

O. Price of Information

1. There will be charges, fixed by the WC on actual cost basis, for providing information depending on its medium; e.g., printed materials, photocopy, computer print out etc. (for which any cost may incurred to SDF). All payments by the IS shall be made in cash.
2. Payment may be exempted in case of poor, vulnerable, socially excluded persons or any person living in the cutting edge of the society.
3. The Working Committee, under the guidance of the management of SDF, will prepare a price list for the information and arrange for publishing on the official website of SDF within a reasonable time frame.

P. Timeline of providing information

The Designated Officer (DO) will provide information and response towards IS within the earliest possible timeline. However, the latest timeline will be as follows:

- a) If the requested information generated at the IPU and at the offices under its purview, at District IPU - the DO shall provide within 10 (ten) working days, and at Regional/ National IPU – the DO shall provide within 20 (twenty) working days;
- b) If the requested information relates to another IPU (for District / Regional IPU) which is not under control of that IPU, DO shall provide within 30 (thirty) working days;
- c) If third party (e.g. village institution) is involved with the information sought for, such information may be provided within 30 (thirty) working days;
- d) If the DO fails to provide the information sought for due to any reason, s/he shall inform the IS the reasons thereof in writing within 10 (ten) working days;
- e) When any information sought for is available with the DO and for which, IS to pay, s/he shall request the IS to pay the price within 5 (five) working days.

Q. Refusal of Providing Information

If the refusal of providing information is caused due to confidentiality of the information as mentioned in section K (22) of the IDP, the DO shall contact with the MD or his/ her delegated authority to get proper authorization from Information Commission (IC) for refusal. After obtaining approval from IC, the DO will provide the reasons of refusal to the IS.

R. Appeal, Disposal

1. Any person who is aggrieved by a decision of the DO may, within 30 (thirty) days from the receipt of such a decision, prefer an appeal to the concerned appellate authority.
2. If the Appellate Authority is satisfied that the appellant for any reasonable cause fails to lodge an appeal within time frame as mentioned in sub-section R (34), it may accept the appeal even after the expiry of that time.
3. The Appellate Authority shall within 15 (fifteen) days of receipt of the appeal under sub-section R (34) or (35) –
 - (a) Direct the concerned DO to supply requested information; or
 - (b) Dispose the appeal if it is not considered fit for acceptance.
4. The DO on being directed to supply information under sub-section R(36) (a) shall, within the time specified in sub-section P (32) (a), (b), (c) and (e) provide the information to the appellant.

S. Penalty

Denial of providing information or any sort of non cooperation with the IS shall be considered as misconduct and delinquency and, if reported, action will be taken as per HR policy of SDF.

T. Responsibility of the Working Committee (WC)

1. The management of SDF will constitute a Working Committee within earliest possible timeframe (not exceeding 30 days from the date of taking effect of the IDP). A Terms of Reference (ToR) may be developed thereof. The WC will be reportable to the MD of SDF.
2. The mandate of the working committee is to observe the implementation of the Information Disclosure Policy (IDP) and to provide assistance to the DO(s) relating to information disclosure. It shall also rectify inconsistency between the IDP and RTI act, 09.
3. The primary function of WC is to determine whether SDF's Information Disclosure Policy is being implemented properly. The WC will also prepare 6 (six) monthly report and will submit to the management of SDF. The WC will also preserve reports of district and regional IPU. The WC will provide the IT department of SDF with necessary assistance for updating implementation status of IDP on the official website every 6 (six) months.
4. Meeting of WC will be held on regular basis. The meeting could be called as and when necessary, and the gap between two meetings shall not exceed 90 (ninety) consecutive days.

U. Eligibility of the Designated Officer (DO)

DO shall be regular employee of SDF with following qualifications:

- a) Clear understanding on RTI act, 09;
- b) Precise knowledge on Information Disclosure Policy (IDP) of SDF and procedures;
- c) Adequate knowledge on SDF values, program and activities;
- d) Believes in people's empowerment and their right to information.

V. Responsibility of the Designated Officer (DO)

DO shall carry out the following responsibilities:

- a) make cordial interaction with the IS;
- b) examine, provide or reject information requested by IS;

- c) keep pertinent records in a register, e.g., brief particulars of IS, what information sought, date of submission of Application for information, status of application (whether accepted or rejected), category of information, fees (if charged), delivery date of requested information or cause of rejection (if done so);
- d) provide acknowledgement slip to the IS in case of submission of Application;
- e) receive cash from the IS in exchange of information and deposit the amount to accounts section of that office with receiving acknowledgement slip within 24 (twenty four) hours;
- f) Prepare quarterly report regarding implementation status of the policy and submit to the line management (for district/regional IPU). At the national IPU, the WC will prepare the report and will subsequently submit to the management.

W. Any thing not contained in the IDP

1. If any situation/ case in connection with right to information come up, which is not covered in the IDP, the DO shall immediately contact with the WC and shall act as per suggestion thereof. The WC will discuss the issue in the following meeting or may call emergency meeting to resolve the situation.
2. Every request for information or any such case shall be dealt with the spirit of promoting human rights through preserving right to information of people.

FORM: Application Form for Information Request

1	Date of Application				
2	Name				
3	Father's Name				
4	Mother's Name				
5	Present Address				
6	Permanent Address				
	Contact detail:				
7	Tele-Phone	Fixed		Cell no.	
	E-mail (if any)	Official		personal	
8	Occupation				
9	Description of the requested Information				
10	Mode of information (v)	Read and take note ()			
		Get copy	Soft copy ()	Printed copy ()	Photocopy ()
11	Signature of the Applicant				
FOR OFFICIAL USE ONLY					
1. Category of Information					
2. If Category 3, then article no of IDP					
3. Mode of information to be provided					
4. Name of third party, if involved					
5. Price for Information, if charged					
6. Date of delivery					
6. Name of DO					Signature

Receipt declaration

Name and Signature of the requestor:

Status of response from DO (√): Information provided () / rejected ()

Date:

FORM: Application Form for Appeal

1	Date of application	
2	Name of appellant	
3	Address (include an easy way to communicate with)	
4	Copy of the order against which, the appeal is lodged (if available)	
5	Description of the order along with the name of DO, against whom the appeal is lodged	
6	Description of grievance	
7	Any other information the appellant wishes to produce before the Appellate Authority	
8	Signature of the Applicant	

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1	Status of application (Accepted/ Rejected), reason if rejected	
2	Report on investigation	
3	Decision and instruction to the DO	
4	Name and designation of Appellate Authority	
5	Signature and date of Appellate Authority	