



Transparency and Confidentiality Policy

Objective

The purpose of this policy is to enhance CEPI's accountability towards partners and stakeholders, as well as the general public who may be interested in CEPI's work, by providing access to the information that will enable CEPI partners and stakeholders to understand its governance, strategies, policies and activities.

This policy is based on the premise that the effectiveness of CEPI's programmes will be strengthened by public access to information about CEPI's activities. Broad availability of access to such information will increase understanding of CEPI's mission, an opportunity to comment on and add to CEPI's work, and to support of CEPI's mission.

This policy acknowledges that CEPI's ability to operate successfully is contingent on gaining access to sensitive information from partner organisations. It is further recognized that such information will not necessarily be accessed without ensuring a level of confidentiality on business-sensitive information, including technical information on platforms, manufacturing and development and, in some cases, financial information.

This policy sets out the categories of documents that shall be made publicly available to external audiences through the CEPI website and other appropriate means of communication. Further guidance on how CEPI gives effect to the transparency requirements of this Policy can be found in the Transparency and Confidentiality Procedure. That Procedure will further govern when and how CEPI enters into non-disclosure or confidentiality agreements and the terms and conditions of such agreements, in particular to preclude conflict with the transparency requirements of this Policy.

Principles

Transparency: CEPI recognises that there is a positive correlation between a high level of transparency through information sharing and public understanding of and support for CEPI-supported activities. The general policy of CEPI is to operate in a transparent and accountable manner, consistent with its Articles of Association.

Presumption in favour of disclosure: CEPI's Transparency and Confidentiality Policy is guided by openness with the underlying presumption that any information regarding CEPI programmes and operations is available to the public, in the absence of a legitimate and clearly-defined exception from public disclosure.

Policy statement

CEPI will manage all types of transparency and confidentiality related items following this policy and the Transparency and Confidentiality Procedure that describes in more detail the disclosure categories.

Easy access to information: To facilitate public access to information and transparency around CEPI's operations, information concerning CEPI's decisions and operational activities will be made available to the public in the manner outlined in this policy.

Disclosure categories

Documents to be posted on CEPI's Website:

Subject to the exceptions set out in the next Section, the information in Table 1 will be made publicly available through posting on CEPI's website. The Transparency and Confidentiality Procedure describes in more detail the disclosure categories; who is responsible, how the information would be made transparent and through what means or mechanism.

Table 1.

#	Category	More detailed description
01	A list of all current Board members and Alternates, and members of each Board Committee.	In addition, a list of members of each Board sub-committee
02	A summary of each Board meeting following their approval by the Board, including the decisions approved by the Board and accompanying Board reports.	
03	A summary of each Scientific Advisory Committee ("SAC") meeting following their approval by the SAC, including the full text of decisions approved by the Committee and accompanying SAC reports.	
04	A summary of each of the other CEPI Committees meetings following their approval by the applicable Committee and after the next Board meeting, including the full text of decisions approved by that Committee:	Committees of the board: any necessary public reporting would be done through the minutes of the Board. A summary of each Joint Coordination Group ("JCG") meeting following their approval by the JCG, including the full text of decisions approved by that Committee and accompanying JCG reports
05	The CEPI governing documents, including Programmatic and Finance policies Secretariat policies	
06	The CEPI Annual Progress Reports.	
07	The CEPI Strategy, Business Plan and its Approved Budget.	
08	A non-confidential summary of each agreement entered into by CEPI and third parties to engage in technical projects in furtherance of CEPI's mission. CEPI will also publish ongoing or annual progress reports for such technical projects.	Reports on project funding awards made by CEPI: description of the technical work agreed to be done and the overall budget envelope agreed to by CEPI and the awardee and progress reports
10	CEPI Annual Financial Report	
11	Summaries of non-expected Internal Audit Reports	Any Internal Audits Reports will be reported to the Board and made part of the publicly reported board minutes – unless subject to an exception from public reporting under section "Exceptions" of this procedure.
12	Summaries of non-expected Investigation Reports	Any Investigations Reports will be reported to the Board and made part of the publicly reported board minutes – unless subject to an exception from public reporting under section "Exceptions" of this procedure.
13	Such other documents that CEPI may decide to make publicly available.	

Subject to the exceptions set out in Section "Exceptions" below, and any restrictions imposed by applicable law, all CEPI documents held by the Secretariat shall be available for public disclosure upon request, provided the costs of making such documents available are reasonable.

Exceptions

CEPI is committed to ensuring that an open and transparent disclosure system is put in place. However, in some instances there may be legal, operational and practical considerations that are necessary to preserve the organisation's interests, as well as those of its staff and its various partners, which may prevent CEPI from achieving full disclosure. Limiting full disclosure can entail redaction of documentation, or in rare occasions holding back documents in whole. Information under the following categories are considered exempt from public disclosure:

- Information received from or sent to third parties, under an explicit requirement or reasonable expectation of confidentiality;
- Information whose disclosure is likely to endanger the safety or security of any individual, violates his or her rights, or invades his or her privacy;
- Information covered by legal privilege;
- Information pertaining to personal employment records or other personal data;
- Information pertaining to whistleblowers (unless permitted under the CEPI Whistleblowing Policy and Procedure).

Ordinarily, the CEPI CEO will determine whether information is to be disclosed (having taken appropriate legal advice where necessary). To disclose information where there is material legal or reputational risk for CEPI, the decision as to whether a document should be disclosed in whole or in part will be escalated to the CEPI Board.

Harm test and public interest override: In exceptional circumstances, the CEPI Board may decide to disclose the information deemed confidential as listed above if it determines that the overall benefits and public interest of such disclosure outweigh the likely harm to the interest(s) protected by the exception(s). This may include situations in which CEPI determines that the disclosure of certain confidential information would avert imminent and serious harm to public health or safety. Such disclosure by CEPI would be on the most restricted basis necessary to achieve the purpose of the disclosure. This does however include disclosure of information that is prohibited by law or contract.

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Linked documents	Transparency and Confidentiality Procedure