

360Giving Disclosure Policy

As an organisation focusing on access to information and openness, transparency on who funds 360Giving, how we are governed and how we operate strengthens our credibility and accountability. Openness also contributes to the efficiency of 360Giving's work, enhancing our relations with external partners and stakeholders.

This policy is guided by openness with the underlying presumption that, whenever possible, information concerning 360Giving's governance and operational activities will be made available in the absence of a compelling reason for confidentiality. We are committed to giving stakeholders access to the information that will enable them to understand the governance, operations and funding of 360Giving.

1. Ethics

360Giving maintains high standards of ethics and behaviour for its Board and staff. We have a zero-tolerance approach to fraud or corruption, whether perpetrated by our own staff or Board, or in connection to specific projects to which we have committed funds. We are committed to ensuring that our financing is used for the purposes intended and have a whistle-blowing policy for reporting and addressing any concerns.

2. Governance

360Giving is governed by a Board of Directors. Details about the current Board of Directors and their Terms of Reference are available from our website.

360Giving aims to comply with best practice in the way it controls and publishes its financial statements and reports on its activities. Detailed and independently audited annual accounts are submitted to Companies House (company number 9668396) and the Charity Commission (charity number 1164883).

3. Disclosure of information

360Giving operates under a presumption of disclosure, meaning that all information we hold is subject to disclosure upon request, unless there is a compelling reason for non-disclosure. There are certain constraints on the information that is disclosed – see exceptions below. Anyone has the right to request and receive timely information from 360Giving. When considering these requests, we do not discriminate or give privileged access to information.

While 360Giving is committed to a policy of presumption of disclosure, we also have a duty to respect professional secrecy and comply with UK law, in particular legislation protecting the sharing of personal data. Access to information will be refused where disclosure would undermine the protection of:

- The privacy and the integrity of an individual, in accordance with UK legislation regarding the protection of personal data.
- Commercial interests of a natural or legal person; intellectual property; court proceedings and legal advice; and investigations and audits.

Requests for disclosure of specific information can be sent to: director@threesixtygiving.org. All requests will be handled promptly and responded to within 20 working days. Responses will either grant full or partial access to the information requested; the reasons for total or partial refusal to share the information will also be provided. Any appeals against decisions can be made to the same email address and will be considered by the Board of Directors. All appeals will be responded to within 20 working days. For complex issues that cannot be answered within this timeframe, the appellant will be informed of the reason of the delay and the deadline for reply can be extended to a maximum of 40 working days from the original date the appeal was submitted.

We are registered with the <u>Information Commissioner's Office</u>. Our registration number is ZA161833.

All the information included on our website is provided under the Creative Commons Attribution 3.0 Unported (CC BY 3.0) licence: https://creativecommons.org/licenses/by/3.0/.