

Coalition for Epidemic Preparedness Innovations (CEPI)

Transparency and Confidentiality Policy

1 Purpose

- 1.1 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.
- 1.2 This policy is based on the premise that the effectiveness of CEPI's programmes will be strengthened by public access to information, and that broad availability to the public of information about CEPI's activities will increase understanding and support of CEPI's mission.
- 1.3 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 information on platforms, manufacturing and development.
- 1.4 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.

2 Principles

- 2.1 **Transparency:** CEPI recognises that there is a positive correlation between a high level of transparency through information sharing and public understanding of CEPI supported activities. The general policy of CEPI is to operate in a transparent and accountable manner, consistent with its Articles of Association.
- 2.2 **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 reason for confidentiality in line with the exceptions in Section 4.
- 2.3 **Easy access to information:** In order 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.

Version number	Approval process	Date
1.0	Prepared by: Secretariat	08.23.2016
	Approved by CEPI Interim CEO	08.24.2016

3 Disclosure categories

Documents to be posted on CEPI's Website

3.1 Subject to the exceptions set out in Section 4, the following information will be made publicly available, in particular through posting on CEPI's website:

- A list of all current Board members and Alternates, and members of each Board Committee.
- A summary of each Board meeting following their approval by the Board, including the decisions approved by the Board and accompanying Board reports.
- 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.
- 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.
- The CEPI governing documents.
- The CEPI Annual Progress Reports.
- The CEPI Strategy, Business Plan and its Approved Budget.
- CEPI financial commitments and disbursements of USD 1 million or above.
- Annual progress reports for approved programmes which have been agreed with any third party awardees.
- Programmatic and Finance policies.
- Secretariat policies.
- CEPI evaluations once approved by the Board.
- CEPI Annual Financial Report
- Internal Audit Reports.
- Investigation Reports.
- Such other documents that CEPI may decide to make publicly available.

3.2 Subject to the exceptions set out in Section 4 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.

4 Exceptions

4.1 CEPI is committed to ensuring that an open and transparent disclosure system is put in place. However, there may in some instances 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 confidential and not available to the public:

- a) Information received from or sent to third parties, under an expectation of confidentiality;
- b) 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;
- c) Information whose disclosure is likely to endanger the proper conduct of any CEPI operation or activity;

- d) Information covered by legal privilege or related to investigation cases on individuals, and information pertaining to legal advice;
- e) Information related to enquiries, investigations and follow up on indications into possible misuse of CEPI funds;
- f) Information on CEPI's internal deliberations and communications;
- g) Commercial information that would harm either the financial interest of CEPI or those of third parties involved;
- h) Commercially sensitive information and information the disclosure of which is restricted by applicable law or contract;
- i) Information pertaining to personal employment records or other personal data;
- j) Information pertaining to whistleblowers.

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.

- 4.2** 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.