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Exclusion Policy for IATI

ICCO is committed to publish its project data as Open Data in an IATI compliant way, and starts with publishing these data in July 2014. ICCO applies the principle of “open, unless...”, which means that information is excluded from publication only if it falls in one of the following categories:

Disclosure of project information would

- 1) Negatively affect relations of ICCO or of partner organizations with government(s) or other stakeholders
- 2) Put the security and safety of persons and organizations at risk
- 3) Jeopardize privacy of staff, partners or other specific persons
- 4) Negatively influence commercial and strategic interests
- 5) Constitute a breach of data-protection laws or agreements, or any other laws and regulations
- 6) Necessitate disproportionately high costs in order to reach a minimum data quality

The data set contains project information and will be updated quarterly in order to make it more complete and of better quality. Therefore new data will always replace the earlier version. This Exclusion Policy can be updated upon each new publication of project data.

Due to a change in database-systems ICCO presents two activity files:

- 1) We publish as ICCO Cooperation until 31-12-2015 (NL-KVK-41177206)
- 2) We publish as ICCO Foundation from 2016 onwards (NL-KVK-56484038)

The change in database implies a gradual transfer from projects into our system. This implies that in Q1 of 2017 only a limited number of projects is published and that in the course of the year we work towards the principle of “open, unless...”.

Decision-making on data confidentiality

All data concerning development assistance projects are published, unless they are marked for exclusion. The ICCO managers with authority to sign contracts also have the authority to decide on exclusion from the data set. Program officers and staff of finance and monitoring departments assist the managers in deciding on exclusions. In the first version of the data set, excluded projects will not be reported. The data set will be accompanied by a scoring, that expresses the amount of transactions published compared to all transactions of the organization as a percentage.



The exclusion categories are elaborated below:

External relations

ICCO keeps data confidential that might otherwise harm its relations with governments, partners or (back) donors. ICCO informs partners about its publication policies, and partners can request exclusion. ICCO is the final decision-maker for not publishing part of its data.

Security and safety

ICCO keeps confidential any information that might pose a security or safety risk to persons, organizations, its own staff, (back) donors or suppliers. In view of such risks, transaction data are disclosed in aggregated form and on a quarterly basis.

Privacy

Under the IATI activity data ICCO does not publish information that is traceable to an individual person. For this reason most data related to individual consultants cannot be disclosed.

Commercial and strategic information

ICCO keeps confidential any information that is of commercial or strategic interest to ICCO, partners, suppliers, (back) donors or cooperating stakeholders. For this reason we exclude information on individual companies we cooperate with, as well as information on loans, guarantees and participations that ICCO provides.

Legal and contractual reasons

ICCO does not publish data where national or international laws prevent their publication. Non-disclosure may also be part of a cooperation agreement or copyright provision, or other contractual conditions.

Consistency and data quality

ICCO starts from the premise that publishing data according to the IATI standard should not lead to disproportionately high costs. In principle, ICCO publishes directly from its database, insofar data are available.

For smaller projects the costs of obtaining and handling data are too high in relation to their relevance. For this reason, projects with an ICCO contribution below €25.000 are not published.

Project data that do not meet minimum data quality and consistency requirements are not published.



IATI website on exclusions and thresholds (accessed April 10, 2014)

<http://iatistandard.org/getting-started/policy-considerations/exclusions-and-thresholds/>

Exclusions and Thresholds

Exclusions

IATI enables publishers of information to the Standard to exclude certain information from their data. The requirement from IATI is that the policy of how those exclusions are made is made public, as part of the Implementation Schedule in order to provide context to those who are using the data. There is a specific section of the Implementation Schedule, and registry publisher record where an organisation can lay out their exclusion policy, and robust reasoning behind it.

Reasons for needing to exclude data depend on each organisation but can vary from security concerns to the need to protect commercial information. However, it is often useful, when deciding on an organisation's exclusion policy to focus on what elements of data can be published, with exclusions as a part of this.

An interesting example of this way of thinking can be found in the guidance produced by BOND and a group of UK NGOs, outlining guidance for developing an Open Information Policy (PDF document). The Implementation Schedule includes for categories for exclusions: a) Data is not applicable to the organisation b) Data falls under a non-disclosure policy c) Data is not currently captured and could only be captured at a prohibitive cost d) Other (to be defined by the organisation)

Considerations when defining an exclusion/open information policy

- Does your organisation/government have any existing Freedom of Information laws or policies that may impact the IATI exclusion policy?
- Are there particular data fields where you would consistently have to remove data?
- Are there entire programmes/activities that would need to be excluded from your IATI data?

Thresholds

Along with exclusions, IATI also suggests that, if applicable, organisations lay some thresholds in terms of the value of activities or transactions that they are publishing. For example, an organisation who works on large projects costing thousands of dollars, they may wish only to publish projects over a particular value (for example \$500).



Similarly, if an organisation generally only makes or receives transactions over a particular value, they may wish to aggregate all transactions, in-coming or out-going that are under a particular value, per organisation, per publication period.

As with exclusions, information on thresholds should be clearly published as part of the organisation's implementation schedule in order to help users of the data understand the context it is being published in.