



# Woord en Daad – Exclusion policy for IATI

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*Version: May 2016*

## **Introduction**

Woord en Daad commits itself to the concept of Open Data. As a part of this commitment Woord en Daad decided to publish project data in an IATI-compliant way. Woord en Daad will begin publishing IATI compliant project data as of April 2016. Woord en Daad embraces the principle “Open, unless...”. Project information is only excluded from publication to IATI if it falls in one of the following categories:

- Information disclosure affecting relations between partner organisation and government/other NGOs (human rights work or work in some conflict affected states);
- Detailed specific information affecting the safety and security of NGO staff, partner staff or beneficiaries;
- Specific personal information of individual staff and/or partners (e.g. addresses)
- Commercially sensitive information (salaries, consultant fees);
- Information that is exempt under data protection laws or by pre-existing organizational policies.

In this exclusion policy these categories are further elaborated and defined.

# 1. General principles for exclusion

## ***External relations***

Woord en Daad does not publish data that might harm the relationship with local governments or local institutions of Woord en Daad, its partners or (back) donors. We have special attention for lobby & advocacy programmes in countries where it is a sensitive issue for governments.

All partner organizations and major back donors are informed upfront about Woord en Daad's policies for publishing project data and have a possibility to request exclusion, based on the principles in this exclusion policy. Woord en Daad is, at all times, the final decision-maker for exclusion of data.

## ***Security***

Woord en Daad does not publish data of which it can reasonably be expected that it might pose a risk to the safety or security of any individuals, local Woord en Daad offices, groups of beneficiaries, partner organisations, (back) donors or suppliers at risk. From a security point of view it was decided to publish all transactions with the general description 'periodic payment'.

## ***Privacy***

Woord en Daad does not publish any project information that is traceable to an individual person and can reasonably be judged as an invasion of the privacy of that person without prior permission of the person involved.

## ***Commercial/Strategic***

Woord en Daad does not publish data that might harm the commercial or strategic interests of Woord en Daad, its partners, (back) donors or suppliers, but only if the information is not publicly available otherwise. Information about the conditions and repayments of loans, investments and guarantees is part of this exclusion and will therefore not be published by Woord en Daad.

## ***Legal/Contractual***

Woord en Daad does not publish data if we do not have the right to publish the data. For example, if third parties have a copyright on certain information or if contractual agreements with back donors or partner organizations impede Woord en Daad's right to publish the data.

## ***History***

Woord en Daad publishes data of all projects started after 1 January 2015.

## ***Cost effectiveness and social impact***

Woord en Daad does not publish data if the costs for publishing/obtaining the data are extraordinary high in relation to the relevance of the data for the public. Furthermore Woord en Daad does not

publish data that possibly harm the social impact of Woord en Daad in general or the related project in particular.

### ***Openness about the exclusion policy***

Woord en Daad will be transparent about the exclusion policy that Woord en Daad applies. This policy will therefore be published.

### ***Data Quality***

Woord en Daad values the quality and consistency of its open data. Therefore Woord en Daad publishes only project data that meet the minimum requirements. Data that does not meet the minimum requirements will be excluded.

## **2. Decision-making on excluding data**

Excluding data from the open policy is done. Information will automatically be marked as available for publication unless a project manager decides otherwise. The responsibility for excluding information is at the level where the information can be assessed in detail, i.e. the level of the project managers. Without any action from their side information will automatically be disclosed. It is possible to mark a project, specific information fields of the IATI standard and/or specific documents as excluded from disclosure in the project administration. This mark automatically excludes the specific information from disclosure.

## **3. Review of exclusion policy and quality of data**

On a quarterly basis Woord en Daad will review all data excluded from disclosure. On the one hand it will be reviewed whether data are rightly excluded, on the other hand it will be reviewed whether the exclusion policy is still valid and does not restrict disclosure of data too much.

The exclusion policy will be reviewed and if necessary adjusted on an annual basis.

**- End of the external exclusion policy -**