CORDAID EXCLUSION POLICY FOR IATI

Introduction

Cordaid commits itself to the concept of Open Data. As a part of this commitment Cordaid decided to publish project data in an IATI-compliant way. Cordaid will begin publishing IATI compliant project data as of November 2013.

Cordaid 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 organization 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

Cordaid does not publish data that might harm the relationship with local governments or local institutions of Cordaid, its partners or (back) donors. All partner organizations and back donors are informed upfront about Cordaid's policies for publishing project data and have a possibility to request exclusion, based on the principles in this exclusion policy. Cordaid is, at all times, the final decision-maker for exclusion of data.

Security

Cordaid 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 Cordaid offices, groups of beneficiaries, partner organizations, (back) donors or suppliers at risk. From a security point of view it was decided to publish transaction on a cumulative basis per quarter per activity.

Privacy

Cordaid 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

Cordaid does not publish data that might harm the commercial or strategic interests of Cordaid, 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about the conditions and repayments of loans, investments and guarantees is part of this exclusion and will therefore not be published by Cordaid.

Legal/Contractual

Cordaid 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 Cordaid's right to publish the data.

History

Cordaid publishes all project data of projects started after 1 January 2013 or ongoing projects with new commitments of more than EUR 25,000 in 2013. The project data before that date are incomplete, but a selection of relevant projects from earlier is part of the data set.

Cost effectiveness and social impact

Cordaid 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. As a consequence of this principle projects with a contribution of Cordaid < € 25,000 will not be published, unless the project team decides otherwise.

Furthermore Cordaid does not publish data that possibly harm the social impact of Cordaid in general or the related project in particular.

Openness about the exclusion policy

Cordaid will be transparent about the exclusion policy that Cordaid applies. This policy will therefore be published.

Cordaid will report all excluded projects as separate activities mentioning an activity identifier and the total commitments for the project.

Data Quality

Cordaid values the quality and consistency of its open data. Therefore Cordaid 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 officer 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 officers. **Without any action from their side information will automatically be disclosed**. It is possible the 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.

To be sure that information is rightly excluded from the open policy; the direct manager approves the exemption made by the project officer.

3. Review of exclusion policy and quality of data

On a quarterly basis the quality & control department of Cordaid 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 -