

Exclusion policy for IATI

January 2018

Introduction

Simavi commits itself to the concept of Open Data. As a part of this commitment Simavi decided to publish project data in an IATI-compliant way. Simavi began publishing IATI compliant project data as of April 2016. Simavi 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 (e.g. salaries, consultant fees);
- Information that is exempt under data protection laws or by pre-existing organisational policies.

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

1. General principles for exclusion

External relations

Simavi does not publish data that might harm the relationship with local governments or local institutions of Simavi, 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 organisations and major back donors are informed upfront about Simavi's policies for publishing project data and have a possibility to request exclusion, based on the principles set out in this exclusion policy. Simavi is, at all times, the final decision-maker for exclusion of data.

Security

Simavi 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 Simavi 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

Simavi 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

Simavi does not publish data that might harm the commercial or strategic interests of Simavi, 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 Simavi.

Legal/Contractual

Simavi 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 organisations impede Simavi's right to publish the data.

Data protection and privacy legislation

This policy is subject to Dutch and European Union data protection and privacy legislation. Accordingly Simavi will not disclose data about living individuals where this is prohibited under applicable law.

History

Simavi publishes data of all projects started after 1 January 2016 in the programmes WASH Alliance International (WAI2016), Golden Line (GfG), More than Brides (MtB), Watershed, Get up Speak out (GUSO), Ritu, and WASH SDG Programme. We strive to publish on all programmes where deemed relevant.

Cost effectiveness and social impact

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

Openness about the exclusion policy

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

Data Quality

Simavi values the quality and consistency of its open data. Therefore Simavi 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 based on the principles set out above. 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.

3. Review of exclusion policy and quality of data

On a quarterly basis Simavi 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 relevant data.

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