

# Fair, Green and Global Alliance

## Exclusion Policy for IATI Publication

Final version, November 2016

**act:onaid**

**Both ENDS**  
Connecting people for change

**Clean  
Clothes  
Campaign**

  
**milieudefensie**  
Friends of the Earth Netherlands

**SOMO**

  
**tni**  
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## **1. Introduction**

From 2016 onwards, the Fair, Green and Global (FGG) alliance has committed itself, as part of the strategic partnership with the Ministry of Foreign Affairs, to be IATI compliant. However, the alliance acknowledges that the open publication of data may present risks to the Alliance members, its partner organisations, and its programme. Once data is published, it's impossible to anticipate how it might be shared further, and once it's out in the open, it can be used for any number of purposes. For this reason, the FGG Alliance has defined an exclusion policy.

The FGG Alliance embraces the principle "Open, unless...". This means that project information is only excluded from publication to IATI if it violates one of the following considerations. In those cases, the FGG Alliance can decide to publish only parts of the information or to not publish any information of the project.

## **2. General principles for exclusion**

The FGG Alliance publishes project data of projects started after 1 January 2016 as part of the strategic partnership with the Ministry of Foreign Affairs. All projects within the strategic partnership not excluded on the grounds outlined in this policy will have their information published.

### *2.a. External relations*

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

### *2.b. Security and safety*

The FGG Alliance does not publish data of which it can reasonably be expected that it might pose a risk to the physical or psychological safety or security of any individuals, members of staff, groups of beneficiaries, partner organizations, (back) donors or suppliers.

### *2.c. Privacy*

The FGG Alliance does not publish any information (photos, names, personal information) that is traceable to an individual person and can reasonably be judged as an invasion of the privacy of that person.

### *2.d. Legal/Contractual*

The FGG Alliance does not publish data if it does not have the right to publish the data or if contractual agreements with back donors or partner organisations impede the alliance's right to publish the data.

### *2.e. Copyright*

Anything on which another organisation has the copyright, will not be published without their permission.

### *2.f. Cost effectiveness*

The FGG Alliance does not publish data if the costs for publishing/obtaining the data are disproportionately high in relation to the relevance of the data for the public.

### *2.g. Social Impact and operational damage*

The FGG Alliance does not publish data that possibly harms the social impact of the alliance in general or the related project in particular. The FGG Alliance will not publish if sharing information on a project could be disadvantageous to its success.

### *2.h. Details*

The level of detail that can be given depends on the type of project. The FGG Alliance will not publish

unnecessarily detailed information such as exact dates and locations in case this is considered a possible risk.

#### *2.i. Openness about the exclusion policy*

The FGG Alliance will be transparent about the exclusion policy that it applies. This policy (or members' own exclusion policy, which is in line with this policy) will therefore be published on the IATI file of the FGG members.

#### *2.j. Data Quality*

The FGG Alliance values the quality and consistency of its open data. Therefore, it publishes only data that meet the minimum requirements of secure and liable information. Data that do not meet the minimum requirements will be excluded.

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

At the time of an IATI update, based on the available information on plans and progress per outcome, per Theory of Change (ToC), FGG members' anchors will produce narratives that adhere to the alliance's exclusion policy. Each FGG member is responsible for its own exclusion. The responsibility for excluding information is where the information can be assessed in detail, i.e. with the FGG Anchors in collaboration with the project teams and partners. They will check the final version of texts with this exclusion policy just before publication in IATI. At FGG alliance level, the information to be uploaded is checked for quality, uniformity, duplication and the exclusion policy by the Coordination Team.

### **4. Instruments to assess necessity of exclusion**

Internally two instruments are available to support decision making about exclusion:

1. *FGG IATI Checklist (Annex A below)*– detect if parts of the project information could be sensitive for publication. To be used to check information prepared for the IATI upload, per ToC, per outcome.
2. *FGG IATI Format for IATI plans and reports* – used to gather and compile texts, and checked for exclusion policy before IATI publication.

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

The exclusion policy will be adjusted if necessary.

### **6. Objection**

Every internal or external stakeholder can object against publication of project information he or she is connected to. Objection has to be motivated on grounds of any of the clauses of this Exclusion Policy. In case of objections, internal and external stakeholders can turn to the complaint procedures of the six FGG Alliance members.

## Annex A – Checklist

1. *These are general indications of what to look for when evaluating which information can be made public and which cannot. Please do not hesitate to exclude information on other grounds as well, when the situation calls for it.*
2. *This list is work in progress. It will be expanded when deemed necessary.*

Always take into account the following considerations when preparing information for publication.

	No	Yes	Maybe
• Are any names of individual persons included?			
• Does the description include any information about the conditions and repayments of loans, investments and guarantees?			
• Is any specific information (images, location or geocoded information, biographical information) included about anyone who has not given express permission?			
• Does the information include any copyright-protected documents or images?			
• Are any of the organisations mentioned in the description at risk if their involvement with the project would be known? <ul style="list-style-type: none"> <li>◦ Also consider any potential future risk, if the (political) situation would change.</li> <li>◦ If so: data should be anonymised.</li> </ul>			
• Could any of the information included impede the proper functioning of the project, if it would be widely known?			
• Does the project description contain excessive detail, such as exact dates or locations?			

Take a moment to check whether you can answer **no** to all of these questions. If you need to answer 'yes' or 'maybe' to one or more answers, then please contact the Coordination Team.