1120 19th Street, NW
Suite 600
Washington, DC 20036
(202) 785-0072 | psi.org

IATI PUBLICATION EXCLUSION POLICY

PSI is a global nonprofit health organization whose activities make it easier for people in the developing world to lead healthier lives and plan the families they desire. Through a focus on five health areas, PSI approaches care from the consumer's perspective, improves the market for products and services, and develops solutions that are affordable, convenient and effective to help make universal health coverage more of a reality.

PSI is committed to compliance with funders' requirements for open information, delivery chain transparency and accountability, including publication of project activity data through the International Aid Transparency Initiative (IATI) where required.

What is IATI?

IATI is a voluntary global initiative to improve the transparency and accountability of aid funding. It has several key stakeholder groups – providers of funding to development and humanitarian programs (donors), partner country governments, civil society and the private sector.

What is open data?

Open data are data that anyone can freely use and share. The IATI Open Data Standard sets out how to share information common across all organizations working on international development and humanitarian activities. The information that is shared includes basic activity information, participating organizations, geopolitical information, classifications, results, transactions and relevant documents.

The IATI Standard is split into two parts: (i) the Organization Standard is used to describe the publishing organization; (ii) the Activity Standard is the space where organizations can publish data on their development cooperation programs.

Open License

PSI will apply an "Attribution-NonCommercial-ShareAlike 4.0 International" (CC BY-NC-SA 4.0) open license to all data that PSI publishes in the IATI Standard. This license lets others copy, distribute, display, perform and modify PSI's data for noncommercial purposes, provided that credit is given to PSI as the source of the data, and any modifications to the data are distributed on the same license terms that PSI initially applied to the data.

Exclusion Principles and Processes

PSI is committed to publishing project data in the IATI Registry when this is required by our donors/ funders. However, the nature of PSI's work and mission to encourage healthy behavior and the affordability of health products and services for vulnerable populations worldwide means that our

activities often address potentially sensitive issues and may involve the collection and processing of personal data that belongs to our beneficiaries. Our global and country strategies are based on careful considerations and great attention to the local socio-political context and legal framework. We are determined to handle information and data with extreme care to avoid placing any of our programs or beneficiaries in jeopardy.

This Exclusion Policy identifies a number of principles, based on which project information and data can be excluded from publication in the IATI Registry. They are:

Exclusion Principle 1: Security and safety

The security and safety of our staff, consultants, volunteers and beneficiaries is a primary concern. PSI will not publish data that could in any way pose a risk to the safety or security of a PSI person (employees, contractors, trainees or volunteers), its clients, donors, partners, sub-awardees, subcontractors, or beneficiaries, including:

- Names of individuals or organizations
- Place names/contact details/addresses/locations
- Information that would disclose activities or intentions that might conflict with local and/or government sentiments
- Other identifying information that could jeopardize safety

Exclusion Principle 2: Personal information

PSI will not publish certain information that intrudes on the privacy of our staff, partners or beneficiaries in line with our confidentiality, data protection and child safeguarding policies. This may include, among other things:

- Personal details (name, age, gender)
- Information about salaries and consultancy fees
- Personal communications
- Funders' information where anonymity has been requested
- Sensitive information relating to staff recruitment and selection processes
- Information relating to allegations of staff misconduct
- Working locations

Exclusion Principle 3: Commercially sensitive information

PSI will not publish commercially sensitive information, such as funding agreements, detailed budgets, staff salaries and benefits, consultant fees, commercial fees, trade secrets, information that might prejudice a competitive bidding process, or other information that could do harm to the commercial interests of PSI or its partners. PSI also will not publish such information when PSI is contractually bound to maintain the confidentiality of such information, or when publishing would violate an intellectual property right, such as copyright or patent ownership.

Exclusion Principle 4: Information exempt from disclosure under other laws, policies and regulations (e.g., Data Protection)

PSI will not publish any data considered private or confidential in nature under relevant data protection laws as well as PSI or partners' internal data protection policies.

Exclusion Principle 5: Government relations

PSI will not publish information that may harm PSI's or its partners' relations with U.S. or foreign governments or institutions. Disclosure of details of certain sensitive programs may impact PSI's or its partners' relations with local or national governments negatively. Further, where portions of a country are under the control of different groups, PSI may need to assess each program on a case-by-case basis to ensure that its relationships with the different groups are not jeopardized.

PSI will apply the above Exclusion Principles in order to exclude data at different levels:

(i) Entire projects or programs (defined as "IATI activities" in IATI);
(ii) Project components (either programmatic or geographic) within an IATI activity;
(iii) Specific data within an IATI activity (a specific "field" in the IATI standard).

It is the responsibility of the Project Director in consultation with PSI General Counsel to decide whether one or more of the five Exclusion Principles applies in each individual case. If the exclusion applies at the corporate level, the PSI General Counsel makes this decision. The decision must be documented in writing, retained in the award file, and communicated to the PSI person or team responsible for the publication in IATI. The exclusion decision must indicate what Exclusion Principle or Principles has or have been applied as well as the scope of the exclusion per the different levels identified above.

As a best practice, PSI will routinely make public the number of projects, programs or activities that we have excluded when we publish information in IATI, as well as the decision-making process for deciding on exclusions as set forth in this Exclusion Policy.

PSI will flow down the IATI publication requirement and this Exclusion Policy to partners as and when required to do so by donors/funders.

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