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Free Press Unlimited

Exclusion Policy for IATI Publication

Amsterdam
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Free Press Unlimited

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FPU Exclusion Policy for IATI Publication

1. Introduction

Free Press Unlimited commits itself to the concept of Open Data. As a part of this commitment FPU decided to publish project data in an IATI-compliant way.

Free Press Unlimited embraces the principle “Open, unless...” or “Publication, unless”. This means that project information is only excluded from publication to IATI if it violates one of the following considerations. In those cases FPU can decide to publish only parts of the information or to not publish any information of the project.

2. General principles for exclusion

Free Press Unlimited publishes project data of projects started after 1 January 2015 or ongoing projects with new commitments of more than EUR 50,000 in 2016. At first, the data set will consist of a selection of relevant projects. During 2016, all projects not excluded on the grounds outlined in this policy will have their information published.

2.a. External relations

Free Press Unlimited 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 FPU’s policies for publishing project data and have a possibility to request exclusion, based on the principles in this exclusion policy. Free Press Unlimited is, at all times, the final decision-maker for exclusion of data.

2.b. Security and safety

Free Press Unlimited 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

Free Press Unlimited does not publish any project 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

Free Press Unlimited does not publish data if we do not have the right to publish the data or if contractual agreements with back donors or partner organizations impede FPU's right to publish the data.

2.e. Copyright

Anything on which another organisation has the copyright, without their permission will not be published.

2.f. Cost effectiveness

Free Press Unlimited 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. As a consequence of this principle projects with a budget under € 50,000 will not be published, unless the Management Team decides otherwise.

2.g. Social Impact

Free Press Unlimited does not publish data that possibly harm the social impact of Free Press Unlimited in general or the related project in particular.

2.h. Operational damage

Free Press Unlimited will not publish if sharing information on a project could be disadvantageous to its success.

2.i. Details

Free Press Unlimited will not publish unnecessarily detailed information such as exact dates and locations. Financial transactions will be published on a cumulative basis per quarter per activity. The level of detail that can be given depends on the type of project. Exact locations or dates will never be given, but projects which are generally considered safe can report at the level of months or sub-national regions/ major cities. Projects with some safety concerns (type 2 or 3 in the decision table) should at most mention quarter-years and the national level, while very sensitive projects (type 4) will not specify which country particular a particular project takes place in.

2.j. Openness about the exclusion policy

Free Press Unlimited will be transparent about the exclusion policy that it applies. This policy will therefore be published on the FPU web-site next to the access to the project-information.

2.k. Data Quality

Free Press Unlimited values the quality and consistency of its open data. Therefore Free Press Unlimited publishes only project data that meet the minimum requirements of secure and liable information. Data that do not meet the minimum requirements will be excluded.

3. Partner organisations and other stakeholders

Much of the information published in IATI by Free Press Unlimited describes (activities of) our partner organisations. This is recognized explicitly in the principles for exclusion described above, particularly regarding privacy and safety. There are many other ways in which information can be



related to or have an impact on other stakeholders. The exclusion policy therefore requires the involvement of these other organisations. For this purpose, we differentiate between *information 'owners'* and *other affected organisations or persons*.

3.a Information Owners

Information owners are the organisations and persons involved in the implementation of the activities on which we report. Because many of our local partner organisations do not report in IATI themselves, Free Press Unlimited describes the activities and results which take place in their part of the chain. As such, they are considered the 'owners' of this information and have the final say in determining what can and what can not be published safely.

At the start of every project, an activity identifier and basic description of the project is created in FPU's activity file. Where possible, this includes objectives, target groups, and expected results. During the implementation period of the project, this information will only need to be made up to date, as activities are implemented and results achieved.

Free Press Unlimited will be in contact with the implementing partner(s) about reporting in IATI before the first moment of publication. The partner will be able to indicate any limits to the information that can be made public, which will also apply to subsequent updates to the activity file. In most cases, this will be enough to determine what can and what can not be included when more details become available later during the project period. If aspects of the project or its circumstances change, then FPU will again contact the partner to verify that this information can be made public.

3.b Other affected organisations or persons

Organisations or persons which are not the information owners can also object to the inclusion of any information in the IATI files of Free Press Unlimited. To do so, they should contact the Knowledge & Quality Coordinator, (see paragraph 7) indicating:

- What they would like Free Press Unlimited to exclude from publication;
- How this information relates to or affects them;
- Whether, in their view, any and which of the principles outlined above are violated by publication.

4. Decision-making on excluding data

Information will automatically be marked as available for publication unless otherwise decided. The responsibility for excluding information is where the information can be assessed in detail, i.e. with the Program Coordinator. Without any action from the Program Coordinator information will automatically be disclosed. It is possible to mark 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 proposal to do so has to be approved by the Management Team.

5. Instruments to assess necessity of exclusion

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

1. *FPU IATI Checklist* – detect if parts of the project information could be sensitive for publication
2. *FPU IATI Decision Table* – four scenarios to support decision making on what to publish.

Both instruments are attached to this Policy Document.

6. Review of exclusion policy and quality of data

On an annual basis the Knowledge & Quality Coordinator and Risk Manager of Free Press Unlimited 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. In addition, the possibility for triangulation (generating new information by combining different pieces of information) will be evaluated, to prevent the possibility that data which are harmless by themselves, might still be used to gain knowledge that could threaten the safety and security of our partners or others. The exclusion policy will be adjusted if necessary on an annual basis.

7. 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 and can be directed to: Knowledge and Quality Coordinator Free Press Unlimited

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1018 DN Amsterdam

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kqc@freepressunlimited.org

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 suggest exclusion on other grounds as well, when the situation calls for it.*
2. *This list is work in progress. It will be fine-tuned as introduction in IATI will progress : after the first batch of projects have been entered into AidStream, we will comb through them to map what type of information should be excluded from these concrete projects, and use this to expand the list of general guidelines.*

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

	No	Yes	Maybe
<ul style="list-style-type: none"> • Are any names of individual persons included? 			
<ul style="list-style-type: none"> • Does the description include any information about the conditions and repayments of loans, investments and guarantees? 			
<ul style="list-style-type: none"> • Is any specific information (images, location or geocoded information, biographical information) included about anyone who has not given express permission? 			
<ul style="list-style-type: none"> • Does the project-information include any copyright-protected documents or images? 			
<ul style="list-style-type: none"> • Are any of the organisations mentioned in the project-description at risk if their involvement with the project would be known? <ul style="list-style-type: none"> ◦ Also consider any potential future risk, if the (political) situation would change. ◦ If so: see p. X for instructions on anonymization. 			
<ul style="list-style-type: none"> • Could any of the information included impede the proper functioning of the project, if it would be widely known? 			
<ul style="list-style-type: none"> • Does the project description contain excessive detail¹? 			
<ul style="list-style-type: none"> • Are precise dates given for financial transactions? <ul style="list-style-type: none"> ◦ If so, change them to the first day of the period. See manual 			

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 Risk Manager or the Knowledge & Quality Coordinator.

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.

¹ For a description of what exactly constitutes 'excessive detail', see 2.i. in the exclusion policy.

Annex B - Decision Table

This table can be used to decide what to do with specific information fields, based on the level and type of privacy or security concerns. Four scenarios are specified:

1. **Fully public:** the largest group of projects, which follow the standard procedure. Example: *Wadada News for Kids*.
2. **Security/ privacy concerns at project location:** when there are risks in the project country, but these do not involve foreign state actors.
3. **Security/ privacy concerns involving governments:** when there are risks which involve a government or another actor that can put pressure on the donor of the project.
4. **Concerns regarding (anticipated) repressive regimes/ direct involvement FPU in implementation:** projects with a stronger 'activist' component, where FPU does not want to disclose (all) activities, or its involvement.

	1: Fully public	2: Security/ privacy concerns at project location	3: Security/ privacy concerns involving governments	4: Concerns regarding (anticipated) repressive regimes/ direct involvement FPU
Title	Titles should be easy to understand and avoid the use of acronyms or jargon.	Check whether the title includes unwanted references to activities or implementing partners.	Check whether the title includes unwanted references to activities or implementing or funding partners.	No title: include under general title with other sensitive projects.
Description	Include general description, objectives and target groups. Include description of the project 'in practice'.	Either exclude references to some objectives/ target groups/ activities and focus on other aspects of the project, and/ or describe them in an ambiguous/ general way.	Either exclude references to some objectives/ target groups/ activities and focus on other aspects of the project, and/ or describe them in an ambiguous/ general way.	Describe overall purpose of multiple projects in a general manner in one text.
Activity status	Refers to where in the project lifecycle the activity is at the time of reporting.	Refers to where in the project lifecycle the activity is at the time of reporting.	Refers to where in the project lifecycle the activity is at the time of reporting.	Create activity lifecycle for group; register new activity after this period when composition of projects changes.
Participating Organisation: funding	Include name of the donor organization.	Include name of the donor organization.	Do not name the donor. Leave this field empty or fill in <i>Free Press Unlimited as funding partner</i> .	List only the donors who have given permission. Do not link any donor with any specific activity or country.
Participating Organisation: implementing	Include name of the partner organization.	Do not name the local partner, OR remove all references to sensitive activities.	Do not name the local partner, OR remove all references to sensitive activities.	Do not name any local partner.
Recipient country	Name the country or countries in which the project takes place. If this variable is used, the Region-variable is excluded.	Name the country or countries in which the project takes place. Use region variable if necessary to obscure precise location.	Name the country or countries in which the project takes place. Use region variable if necessary to obscure precise location.	Include general list of all countries in which we do this type of work. Do not link concrete activities to a specific country.
Transactions	Aggregate per partner per budget year. Do not publish separate commitments or the precise dates of transactions.	Aggregate per partner per budget year. Do not publish separate commitments or the precise dates of transactions.	Aggregate per partner per budget year. Do not publish separate commitments or the precise dates of transactions.	Do not publish any transactions. Only include the budgets.
Results	Only publish output results, except for very large projects where outcome results can be included.	Check whether the results do not describe activities that should be excluded from the description, or include information from which the partner organisation can be deduced.	Check whether the results do not describe activities that should be excluded from the description, or include information from which the partner organisation can be deduced.	Only include (output) results related to the 'harmless aspects' of the projects. Will most likely become unintelligible as a whole, although some targets (and whether these have been made) could be included.

See also: 'notes' in Aidstream manual (gray background); IATI implementation-Schedule (activity data tab)