

Open Information and Exclusion Policy for IATI Publication

Ronald Gijsbertsen en Ilke Adriaans

Colophon

T

Open Information and Exclusion Policy for IATI Publication

February 2018

Authors: Ronald Gijsbertsen and Ilke Adriaans

Published by:



Stichting Onderzoek Multinationale Ondernemingen (SOMO)
Centre for Research on Multinational Corporations

Sarphatistraat 30
1018 GL Amsterdam
The Netherlands
Tel: + 31 (20) 6391291
Fax: + 31 (20) 6391321
E-mail: info@somo.nl
Website: www.somo.nl



This document is made available under a Creative Commons Attribution-Share Freely, but attribute to SOMO

This open information and exclusion policy was built upon by the Free Press Unlimited Exclusion Policy for IATI publication

Werkwijzer: 1.5.4a SOMO's Open Information and Exclusion Policy

The Centre for Research on Multinational Corporations (SOMO) is a critical, independent, not-for-profit knowledge centre on multinationals. Since 1973 we have investigated multinational corporations and the impact of their activities on people and the environment. We provide custom-made services (research, consulting and training) to non-profit organisations and the public sector. We strengthen collaboration between civil society organisations through our worldwide network. In these three ways, we contribute to social, environmental and economic sustainability.

Contents

| | | |
|-----------|---|----------|
| 1. | Introduction..... | 4 |
| 2. | General principles for exclusion..... | 4 |
| 2.1. | External relations | 4 |
| 2.2. | Security and safety | 4 |
| 2.3. | Privacy | 5 |
| 2.4. | Legal/Contractual | 5 |
| 2.5. | Copyrights..... | 5 |
| 2.6. | Cost effectiveness | 5 |
| 2.7. | Social Impact and operational damage | 5 |
| 2.8. | Details..... | 5 |
| 2.9. | Openness about the open information and exclusion policy..... | 5 |
| 2.10. | Data quality..... | 6 |
| 3. | Instruments to access necessity of exclusion | 6 |
| 4. | Review of exclusion policy and quality of data..... | 6 |
| 5. | Objection | 6 |
| | Annex A - Checklist..... | 7 |
| | Annex B – Decision Table | 8 |

1. Introduction

The Stichting Onderzoek Multinationale Onderneming (SOMO) commits itself to transparency regarding its activities. SOMO applies different instruments to implement this transparency. Firstly SOMO publishes information about its strategies, activities, results, funders and policies on its website. Besides this information SOMO also publishes its annual report with financial information and activity report on its website. Secondly SOMO is transparent in a responsive way. In line with its code of conduct SOMO will answer any question in relation to its policies and handle possible complaints with care and in with its complaint mechanism. Thirdly SOMO decided to publish project data in an IATI-compliant way. IATI data is used for aid transparency and SOMO will report on its development aid funds through contractual agreements with its donors.

SOMO works on the dynamics of globalization with special attention to the work being done in developing countries. SOMO embraces the principle “Open, unless...” or “Publication, unless”. This means that project information will be excluded from publication to IATI if it (possibly) violates one of the following considerations. In those cases, SOMO will decide to publish only parts of the information or to not publish any information of the project.

2. General principles for exclusion

SOMO publishes project data of projects started after 1 January 2016 or ongoing projects with new commitments of more than EUR 100,000 in 2016. The funding for this project must be related to Aid funds and the the obligation to publish must be described in the contract with the funder. At first, the data set will consist of a selection of projects funded by the Ministry of Foreign Affairs that require an IATI publication. After 2016, what SOMO publishes will be based by agreements set out by the funders. Based on difference experiences, cooperation with international partners in the field of research, lobby and advocacy brings many risks. SOMO cannot oversee all these risk for partners on forehand.. For this reason SOMO, quite often, does neither publish names of partner organisations nor country specific information. In these cases SOMO reports on its funding of these organisations as direct project costs for SOMO to avoid putting its partners at risk.

2.1. External relations

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

2.2. Security and safety

SOMO does not publish data of which it can be reasonable 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 organisations, (back) donors or suppliers.

2.3. Privacy

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

2.4. Legal/Contractual

SOMO 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 SOMO's right to publish the data.

2.5. Copyrights

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

2.6. Cost effectiveness

SOMO 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 €100.000 will not be published, unless the Management Team decides otherwise.

2.7. Social Impact and operational damage

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

2.8. Details

The level of detail that can be given depends on the type of project. SOMO 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. SOMO cannot oversee the risk for partners by publishing country specific or regional grievances. 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.

2.9. Openness about the open information and exclusion policy

SOMO will be transparent about the open information and exclusion policy that it applies. This policy will therefore be published on the SOMO web-site next to the access to the project-information.

2.10. Data quality

SOMO values the quality and consistency of its open data. Therefore SOMO 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. Instruments to access necessity of exclusion

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

- ❑ SOMO IATI Checklist- detect if parts of the project information could be sensitive for publication
- ❑ SOMO IATI Decision Table- four scenarios to support decision making on what to publish.

Both instruments are attached to this Policy Document (Annex A & B).

4. Review of exclusion policy and quality of data

On an annual basis the Director and PME Officer of SOMO will review all data excluded from disclosure. On the one hand it will be reviewed whether data are rightly excluded from disclosure. On the one 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 and others. The exclusion policy will be adjusted if necessary on an annual basis.

5. 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 Open Information and Exclusion Policy and can be directed to SOMO's Complaint Form which can be found on our [website](#). You can also mail us at: SOMO, Sarphatistraat 30, 1018 GL Amsterdam, The Netherlands, info@somo.nl

Annex A - Checklist

- *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.*
- *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"> ◦ Also consider any potential future risk, if the (political) situation would change. ◦ If so: data should be anonymised. | | | |
| • 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.

Annex B – Decision Table

| | 1: Fully public | 2: Security/ privacy concerns at project location | 3: Security/ privacy concerns involving governments | 4: Concerns regarding (anticipated) repressive regimes/ direct involvement SOMO |
|---|--|---|--|---|
| 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 <i>or funding partners</i> . | n/a |
| 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. | n/a |
| 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. | n/a |
| Participating Organisation: Funding | Include name of the donor organization. | Include name of the donor organization. | n/a | n/a |
| Participating Organisation: Implementing | Include name of the partner organization. | n/a | n/a | n/a |
| Recipient Country: n/a to SOMO *see section 2, 2.8, 2.10 | n/a | n/a | n/a | n/a |
| 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 | 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. |