# IATI EXCLUSION POLICY

# 1. Introduction

Cordaid commits itself to the concept of Open Data. As a part of this commitment, Cordaid publishes project data in a compliant way to the International Aid Transparency Initiative (IATI). All Cordaid publishing is completed in accordance with applicable standards of the Dutch Ministry of Foreign Affairs and conditions as part of contractual agreements with back donors and partner organizations.

For all IATI publishing activities, Cordaid embraces the principle "Open, unless…"; Cordaid can decide to publish only parts of the data or not to publish any data from a project in special cases. Project data is excluded from publication to IATI if it falls under the categories described in section 2.

# 2. General principles for exclusion

Cordaid publishes data from projects where contribution of Cordaid is more than 75,000 EUR. Prior to 2020, Cordaid published to IATI those projects funded by the Dutch Ministry of Foreign Affairs. As of 1 January 2021, all projects not excluded on the grounds outlined in this policy will have their data published. All projects funded by the Dutch Ministry of Foreign Affairs, where contribution of Cordaid is more than 75,000 EUR, will be published in accordance with the guidelines of the Dutch Ministry of Foreign Affairs. Remaining projects above 75,000 EUR will be published based on basic list of IATI elements known as Cordaid Essentials.

### 2a. Data Protection and Privacy
For all processing and archiving of personal data, which could be reported through IATI, Cordaid complies with European Union General Data Protection Regulation (GDPR). As part of GDPR, Cordaid pays full attention to data privacy and anonymity if requested and/or needed to safeguard safety of respondents. The Cordaid Data Governance Policy and complimenting Data Protection Policy were developed to ensure responsible use of data and safety of stakeholders, including Cordaid beneficiaries. From a security perspective, some transactions may be published on a cumulative basis per quarter per activity.

### 2b. Legal and Contractual
Cordaid 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 Cordaid's right to publish the data.

### 2c. Cost effectiveness
Cordaid does not publish data if the costs for publishing and/or obtaining the data are extraordinarily high in relation to the relevance of the data for the public. As a consequence, projects with a contribution from Cordaid less than EUR 75,000 will not be published, unless the Project Owner decides otherwise.

### 2d. External relations

Cordaid does not publish data that might harm the relationship with local governments or local institutions of Cordaid, its partners or (back) donors. All partner organizations and back donors are informed upfront about Cordaid's policies for publishing project data and have a possibility to request exclusion and set alternative requirements for publication. Cordaid is, at all times, the final decision-maker for exclusion of data.

**2e. Operational risk**
Cordaid will not publish if sharing data on a project could in Cordaid's view, if disclosed, risks compromising significant policy dialogue with governments, donors, communities or partners. Cordaid will not publish data that might harm the commercial or strategic interests of Cordaid, its partners, (back) donors or suppliers, but only if the data is not publicly available otherwise.

## 3. Decision-making and process of excluding data

IATI data will automatically be marked as available for publication unless a Project Owner indicates otherwise. The responsibility for excluding data is at the level where the data can be assessed in detail, i.e. the level of the Project Owner. Without any action from the Project Owner, data will automatically be disclosed.

Project data will be excluded from disclosure to IATI through the Cordaid Monitoring and Evaluation (M&E) system. This system is linked with IATI and allows Cordaid to publish project results at any desired time during project implementation, and closure, for the wider public when appropriate and possible. Specific IATI fields can also be excluded from the M&E system, so that the project may be reported but without specific fields. The Project Owner is responsible to ensure that data is excluded according to the principles for exclusion.

## 4. Maintenance of exclusion and exclusion policy

On an annual basis, the Cordaid Monitoring, Evaluation and Learning (MEL) team at the Global Office reviews all data excluded from disclosure to verify whether data is rightly excluded and whether the exclusion policy is still valid and does not unnecessarily restrict disclosure of data. The exclusion policy itself will be reviewed by this team and, if necessary, adjusted on an annual basis.

## 5. Instruments to assess necessity of exclusion

An IATI Exclusion Checklist is available to support decision making about exclusion in order to detect if parts of the project data might be sensitive for publication. Project Owners may be requested to give justification for a decision to exclude project data to the Cordaid Board and MEL Team Global Office.

## 6. Objection to disclosure

Internal and external stakeholders linked to project data can object to the publication of project data. Objection shall be motivated on grounds of any of the clauses of this Exclusion Policy and can be directed to the relevant Project Owner for review.

## 7. Openness about policy

Cordaid will be transparent about this exclusion policy. This policy will therefore be published on the Cordaid website.

## 8. Cordaid Essentials

IATI elements required for all Cordaid projects with a budget greater than 75,000 EUR will be reported according to a short list referred to as Cordaid Essentials. Unless there are special circumstances relating to IATI Exclusion, the Cordaid Essentials will include at minimum: project names and coding, reporting periods, project dates, indicators, implementing organizations and their roles, budget and location details.