

## EXCLUSION POLICY

Our organisation works on the principle that all project information should be published unless a clear reason is provided in accordance to our Exclusion Policy.

We are aware that safe and appropriate collection and use of data to improve HIV programs for key populations is a critical topic. Together with strategic partners our organization develops useful tools and strategies for dealing with the ethical, security and privacy challenges facing data-driven advocacy while minimizing risks and protecting human rights.

### Introduction

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Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland commits itself to the concept of Open Data. As a part of this commitment Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland decided to publish project data in an IATI-compliant way. Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland will begin publishing IATI compliant project data as of 30 April 2016.

Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland embraces the principle “Open, unless...”. Project information is only excluded from publication to IATI if it falls in one of the following categories:

- Information disclosure affecting relations between partner organisation and government/other NGOs (e.g. human rights work or work in some conflict affected states);
- Detailed specific information affecting the safety and security of NGO staff, partner staff or beneficiaries (e.g. with regard to key populations in violent environments);
- Specific personal information of individual staff and/or partners (e.g. addresses);
- Commercially sensitive information (salaries, consultant fees);
- Information that is exempt under data protection laws or by pre-existing organisational policies.

### General principles for exclusion

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#### *External relations*

Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland does not publish data that might harm the relationship with local governments, partner organisations or (back) donors. All partner organisations and back donors are informed upfront about Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland policies for publishing project data and have a possibility to request exclusion, based on the principles in this exclusion policy. Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland is, at all times, the final decision-maker for exclusion of data.

#### *Security*

Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland does not publish data of which it can reasonably be expected that it might pose a risk to the safety or security of any individuals, groups of beneficiaries, partner organisations, activists, (back) donors or suppliers at risk. From a security point of view it was decided to publish transaction on a cumulative basis per quarter per activity.

#### *Privacy*

Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland does not publish any project information that is traceable to an individual person and can reasonably be judged as an invasion of the privacy of that person without prior permission of the person involved.

#### *Legal/Contractual*



Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland does not publish data if we do not have the right to publish the data. For example, if third parties have a copyright on certain information or if contractual agreements with back donors or partner organisations impede Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland right to publish the data. Information about the conditions and repayments of loans, investments and guarantees is part of this exclusion and will therefore not be published by Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland.

#### *History*

Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland publishes all project data of international projects started after 1 January 2016 or ongoing projects with new commitments of more than EUR 25,000. A selection of national projects will be published. The project data before that date are incomplete, but a selection of relevant projects from earlier is part of the data set.

#### *Cost effectiveness and social impact*

Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland does not publish data if the costs for publishing/obtaining the data are extraordinary high in relation to the relevance of the data for the public. As a consequence of this principle projects with a contribution of Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland < € 25,000 will not be published, unless the project team decides otherwise.

Furthermore Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland does not publish data that possibly harm the social impact of Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland in general or the related project in particular.

#### *Openness about the exclusion policy*

Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland will be transparent about the exclusion policy that Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland applies. This policy will therefore be published.

#### *Data Quality*

Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland values the quality and consistency of its open data. Therefore Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland publishes only project data that meet the minimum requirements. Data that does not meet the minimum requirements will be excluded.

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

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The responsibility for excluding information is at the level where the information can be assessed in detail, i.e. the level of the project officers and implementing partners. It is possible they mark a project, 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 direct manager approves the exemption made by the project officer.

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

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On a quarterly basis the programme managers of Aids Fonds - STOP AIDS NOW! - Soa Aids Nederland 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.

The exclusion policy will be reviewed and if necessary adjusted on an annual basis.