Aidsfonds IATI Exclusion Policy

1. Introduction

Aidsfonds commits itself to the concept of Open Data. As a part of this commitment, Aidsfonds publishes project data in accordance with the [International Aid Transparency Initiative (IATI)](#) standards. IATI is a "global initiative to improve the transparency of development and humanitarian resources and their results to address poverty and crises". Aidsfonds uses open data to improve the quality and relevance of its work and to encourage collaboration and innovation in the field of HIV and AIDS. All Aidsfonds publishing is completed in accordance with applicable standards and conditions as part of contractual agreements with back donors and partner organizations.

Aidsfonds' project data published in IATI is public and may be used, reused and shared by everyone under the Creative Commons license (CC BY-NC-SA). As such, Aidsfonds publishes into IATI project data and updates its projects every quarter unless there is a clear reason not to do so as defined in this policy.

Aidsfonds is aware that safe and appropriate collection and use of data to improve HIV programs for key populations is a critical topic. For certain reasons, it may be deemed necessary to exclude data that has been committed to be published so that no harm comes to Aidsfonds, partners work or staff or the communities themselves.

This exclusion policy contains the criteria to determine under what circumstances projects or information is to be excluded from publication.

2. General principles for exclusion

Project data not excluded on the grounds outlined in this policy will have their data published to IATI based on the IATI standards.

External Relations
Aidsfonds does not publish data that might harm the relationship with local governments, partner organizations or (back) donors. All partner organizations and back donors are informed upfront about Aidsfonds policies for publishing project data and have a possibility to request exclusion, based on the principles in this exclusion policy.

Security
Aidsfonds does not publish data on a project if it could potentially risk compromising the safety and security of the Partner involved in the project including its staff and partners and the communities themselves. This consideration also includes risks of safety and security signaled to Aidsfonds by the Partner or others involved in the implementation of the project.

Privacy
Aidsfonds does not publish any project information that is traceable to an individual person.

Legal/Contractual
Aidsfonds 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 organizations impeded Aidsfonds 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 Aidsfonds.

History
Aidsfonds publishes project data of a selection of projects started after 1 January 2016 or ongoing projects with new commitments of more than EUR 50,000.

Cost effectiveness and social impact
Aidsfonds does not publish data if the costs for publishing/obtaining the data are extraordinarily high in relation to the relevance of the data for the public. Because of this principle, projects with a contribution of Aidsfonds < EUR 50,000 will not be published, unless the Project Manager decides otherwise.

Furthermore, Aidsfonds does not publish data that could potentially harm the social impact of Aidsfonds in general or that of the Partner.

Openness about the exclusion policy
Aidsfonds will be transparent about the exclusion policy that Aidsfonds applies. Therefore, this exclusion policy will be made publicly available and published to the Aidsfonds website. Any data excluded from publication will refer to this policy.

Data Quality
Aidsfonds values the quality and consistency of its open data. Therefore, Aidsfonds publishes only project data that meet the minimum requirements. Data that does not meet the minimum requirements will be excluded.

3. Decision-making and process of excluding data

As part of Aidsfonds responsibility to safeguard both Aidsfonds and Partners we work with as well as communities we serve, project data intended to be published to IATI is assessed prior to publication for potential safety and security risks and, when necessary, (partly) excluded from publication. Aidsfonds Departmental Managers ensure IATI Standards including the exclusion policy are followed. The Project Manager, being the respective (Senior) Project Office and/or Finance Officer/Business Controller of Aidsfonds, is responsible for ensuring that project data is reviewed and excluded in line with this policy prior to publication.

The responsibility for indicating project data for exclusion is at the level where the data and risk can be assessed in detail, i.e., the level of the Project Manager and Partner. Project data intended for publication under the IATI Standard will be reviewed for potential safety and security risks by the Project Manager and the Partner to the project agreement.

The Project Manager and Partner consider what data about a project is reasonable to publish, and what, if any, data needs to be excluded for potential safety and security risks. What might be excluded could include, but not limited to: Partner organizational information, including location and/or where project work is implemented (country, region), financial information, etc. In some extreme cases, an entire project may be excluded from publication.

Once project data has been reviewed and confirmed by both Project Manager and Partner, the Project Manager is responsible to ensure that where necessary any data is excluded according to these principles for exclusion and that any data fields to be excluded from publication are indicated as "anonymized" with the URL to this policy referenced in the data field of the IATI registry. No specifics on the (potential) risk are to be included in this data field. The Project is then published to IATI.

Examples of why data or an entire project might need to be excluded from publication include, but are not limited to:

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- the project activities are considered illegal or otherwise unacceptable by states or societies, for example concerning human rights, gender or governance activities
- the project is being undertaken in sensitive geographical areas and it presents a risk to publish the location of the project and/or the partner organization
- the Partner organization operates in, is representative of or works with communities that are criminalized, face systematic human rights violations or otherwise deemed unacceptable by states or societies
- there is a need to protect commercial information
- the grant contract restricts which details you can make public

Further, it may also be that a signal has been received by either Aidsfonds and/or Partner to the project agreement that there is an (immediate) risk from external forces or that there has been a dramatic change in the environment that Aidsfonds and/or the Partner operate (i.e., war, change in governmental policy, etc.). In this respect, data on the project(s) concerned that has already been published to IATI should be removed immediately from publication and the project (temporarily) excluded from future publishing. This status remains so until there has been a documented review of the risk situation and of the data published in IATI and the situation has been confirmed by both Aidsfonds and Partner as considered safe.

For safeguarding and to ensure alignment across projects, Aidsfonds will internally communicate to relevant Project Managers and Partners that have project data that is excluded from publication.

4. Maintenance of exclusion and exclusion policy

On a quarterly basis, Departmental Managers at Aidsfonds reviews all data excluded from publication to verify whether data is rightly excluded and whether the exclusion policy is still valid and does not unnecessarily restrict disclosure of data.

Further, the exclusion policy itself will be reviewed annually by Aidsfonds Impact Officer and, if necessary, adjusted. Any update to this policy is undertaken, communicated internally and published to the Aidsfonds website within a reasonable time frame.

5. Instruments to assess necessity of exclusion

An IATI Exclusion Checklist is available to support the analysis of project data and identify data to exclude from IATI based on potential safety and security risks. Project Managers may be requested to provide justification for a decision to exclude project data. Further, new staff of Aidsfonds are made aware of this policy, including its safeguarding requirements, and IATI Exclusion Checklist. Staff of Aidsfonds are provided with training and reminders on this policy and the IATI Exclusion Checklist on an annual basis.

6. Objection to disclose

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

7. Openness about policy

Aidsfonds will be transparent about this exclusion policy. In line with IATI guidelines, this policy will be published on the Aidsfonds website.