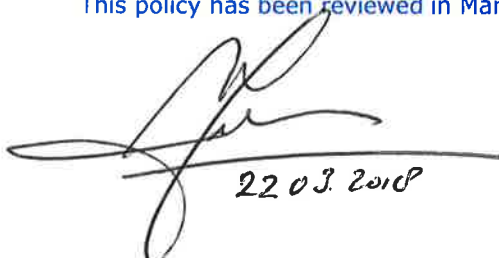


SNV's exclusion policy for IATI

Version 2.0

March 2018

This policy has been reviewed in March 2018 and is valid until further notice



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Introduction

SNV commits itself to the concept of Open Data. As a part of this commitment SNV decided to publish project data in an IATI-compliant way. SNV has been publishing IATI compliant project data since 2016 and will continue to do so for all DGIS and DfID funded projects over 250.000 euro that started in 2016 or beyond.

SNV 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 SNV, partner organisations and/or other organisations;
- Detailed specific information affecting the safety and security of project staff, partner staff or beneficiaries;
- Specific personal information of project staff, partners or beneficiaries;
- Commercially sensitive information;
- Information that falls under data protection laws or under pre-existing organisational policies.

In this exclusion policy these categories are further elaborated and defined.

1. General principles for exclusion

External relations

SNV does not publish data that might harm the relationship with partners of SNV. All partner organisations including back donors are informed upfront about SNV's policies for publishing project data and have a possibility to request exclusion, based on the principles in this exclusion policy. SNV is, at all times, the final decision-maker for the exclusion of data.

Security

SNV does not publish data which, if published, can reasonably be expected to pose a risk to the safety or security of any individuals, local SNV offices, beneficiaries, partner organisations, (back) donors or suppliers.

Privacy

In line with the applicable data protection law in The Netherlands, SNV does not publish any project information that is traceable to an individual person or organisation and can reasonably be judged as an invasion of the privacy of that person / organisation without prior permission of the person / organisation involved.

Commercial/Strategic

SNV does not publish data that might harm the commercial or strategic interests of SNV, its partners, (back) donors or suppliers. Information about the conditions and repayments of loans, salaries and consultancy fees, detailed activity budgets is part of this exclusion and will therefore not be published by SNV.

Legal/Contractual

SNV 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 SNV's right to publish the data.

Cost effectiveness and social impact

SNV 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 budget of less than € 250,000 will not be published, unless the project team decides otherwise.

Furthermore SNV does not publish data that possibly harm the social impact of SNV in general or the related project in particular.

Data Quality

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

2. Decision-making and openness on excluding data

The responsibility for excluding information is at the level where the information can be assessed in detail, i.e. the level of the project manager. The project manager indicates whether the whole project, or specific information fields of the IATI standard are to be excluded from disclosure.

SNV will be transparent about the exclusion policy that SNV applies. This policy will therefore be published at SNVs website.

3. Review of exclusion policy and quality of data

On a regular basis corporate PSO/PME reviews data excluded from disclosure. On the one hand it reviews whether information is rightly excluded, on the other hand it checks whether information might need to be excluded from disclosure.

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