

# Exclusion Policy Stichting Tropenbos International

## Introduction

Stichting Tropenbos International (TBI) is committed to the concept of Open Data. As a part of this commitment TBI decided to publish project data in an IATI-compliant way. The first IATI compliant project data has been published in April 2016.

TBI embraces the principle “Open, unless...”. The purpose of this exclusion policy is to explain the principles for which TBI may decide to exclude project information from being published in IATI. These are principles concerning:

- External relations
- Security
- Privacy
- Commercial/strategic considerations
- Legal/contractual obligations
- Cost effectiveness and social impact
- Data Quality

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

## 1. General principles for exclusion

### *External relations*

TBI does not publish data that might harm the relationship with local governments or local institutions, its partners or (back) donors. All partner organizations and major back donors are informed upfront about TBI’s policies for publishing project data and have a possibility to request exclusion, based on the principles in this exclusion policy. TBI is, at all times, the final decision-maker for exclusion of data.

### *Security*

TBI 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, e.g. NGO staff, partner staff or beneficiaries, other Friends of the Earth groups, (back) donors or suppliers, or affect relations between partner organizations and government/other NGOs, human rights work or work in conflict affected states.

### *Privacy*

TBI 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. TBI does not publish specific personal information of individual staff and/or partners.

### *Commercial/Strategic*

TBI does not publish data that might harm the commercial or strategic interests of TBI , its local or other partners, (back) donors or suppliers, but only if the information is not publicly available otherwise. This includes publishing strategic plans that might harm the effectiveness of lobby and advocacy efforts of TBI, its local or other partners. Commercially sensitive information about the conditions and repayments of loans, investments and guarantees, and salaries and consultant fees is also part of this exclusion and will therefore not be published by TBI.

### *Legal/Contractual*

TBI 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, if contractual agreements with back donors or partner organizations impede TBI's right to publish the data, or if information is exempt under data protection laws or by pre-existing organizational policies.

### *Cost effectiveness and social impact*

TBI 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. As a consequence of this principle financial data will only be published annually., unless TBI decides otherwise. Furthermore TBI does not publish data that possibly harm the social impact of TBI in general or the related project in particular.

### *Data Quality*

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

## **2. Openness about the exclusion policy**

TBI will be transparent about the exclusion policy that TBI applies. This policy will therefore be published.

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

TBI has the right to exclude data. Information will be disclosed unless a project officer decides otherwise. The responsibility for excluding information is at the level where the information can be assessed in detail. It is possible to exclude a particular project, specific information fields of the IATI standard and/or specific documents from disclosure in the project administration.

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

On a quarterly basis TBI will review all data excluded from disclosure. It will be reviewed whether data are rightly excluded and if the exclusion policy is still valid. The exclusion policy will be reviewed and if necessary adjusted on an annual basis.

## **5. Scope of this exclusion policy**

This exclusion policy concerns the projects and activities deployed by TBI only.

**- End of the external exclusion policy -**