

# EXCLUSION POLICY FOR IATI DATA

## This policy relates to data published under the International Aid Transparency Initiative (IATI) standard

Frontline AIDS commits itself to the concept of Open Data. As such it publishes data in accordance with the International Aid Transparency Initiative (IATI) standards.

### Introduction

This exclusion policy is based on the assumption that all information required to meet the [IATI standard](#) should be disclosed unless there are robust reasons for it to be withheld from publication.

When publishing data, we aim to be transparent while complying with the law (including the EU General Data Protection Regulation- GDPR), minimising risks and protecting human rights. Ensuring the safety and security of our partners and those most affected by HIV is Frontline AIDS' first responsibility. We take seriously our commitment to ensuring the data we publish does not put at risk the safety or privacy of individuals, or harm the social impact of our work.

### What we publish

We publish IATI data elements in compliance with the requirements of our donors. In general this includes:

#### 1. Organisation Standard:

- Organisation's name, identification and details
- Forward-looking budgets
- Strategic documents such as Frontline AIDS' strategy and annual reports

#### 2. Activity Standard (about projects / programmes):

- The name, description, target groups and objectives of the project
- The name of the organisations implementing the project in each country
- Geographic coding, Sectors and classifications
- Forward-looking budgets
- Financial transactions: incoming (committed) funds, expenditure, and the money we disburse to all our implementing partners. Please note we only publish information on money we disburse directly. We do not publish details of any money that in-country partners onward grant to other partners.
- Project results: using the results framework and agreed indicators / targets, disaggregated where relevant

## General principles for exclusion of data

Information is excluded from IATI publication if it falls into one of the following categories:

### 1. International relations:

Frontline AIDS does not publish data that might harm relationships between its Linking Organisations or implementing partners and the community based organisations, partners, governments and donors with which they work. This includes where it might harm our human rights and advocacy work - for example information that is critical of a government / policy - or work in conflict affected states where different parts of the country might be under the control of different groups.

### 2. Safety and security

Frontline AIDS does not publish data if doing so might pose a risk to the safety or security of any individuals (e.g. people most affected by HIV, people from key population groups, other clients of services, partners, suppliers, donors or staff). We do not publish the names of individuals, organisations, locations or activities that conflict with local/government sentiments if this would pose a risk to those involved.

If the context is particularly high risk, project information such as target groups and activities will be excluded; only long term goals will be published.

### 3. Personal information

Frontline AIDS does not publish any project information that is traceable to an individual, discloses their HIV status or can otherwise be reasonably judged as an invasion of the privacy of that person without prior permission of the person involved. We do not publish the names or contact details of individuals.

### 4. Commercially sensitive information

Frontline AIDS does not publish data that might harm the commercial or strategic interests of Frontline AIDS, its partners, donors or suppliers- but only if the information is not publicly available otherwise. Information about the conditions and repayments of loans, investments and guarantees is part of this exclusion and will therefore not be published by Frontline AIDS. This may include details of consultancy fees and salaries.

### 5. Information that is exempt under other laws, policies and regulations

Frontline AIDS does not publish data if we do not have the right to publish it. For example, if third parties have copyright on certain information or if contractual agreements with donors or partner organisations impede Frontline AIDS' right to publish the data.

Frontline AIDS will comply in all respects with applicable data protection law, including the UK Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

### 6. Cost effectiveness

Frontline AIDS' does not publish data if the costs for publishing/obtaining the data are very high in relation to the relevance of the data for the public. Therefore data in respect of projects where Frontline AIDS contributes less than USD \$25,000 will not be published, unless there is a specific reason for doing so.

Frontline AIDS will always publish data on projects where it is required to by its donors. Information on other projects (where donor requirements do not specify IATI publication) will only be published at the Frontline AIDS' discretion if it is cost effective to do so.

## 7. Social impact

Frontline AIDS does not publish data that could harm the social impact of Frontline AIDS in general or the project in particular. For example we may exclude data on work carried out which is considered by some states or societies as illegal or unacceptable; for example work relating to human rights or criminalised people. If this is the case, we may not publish details of the work and the areas in which it takes place- project information such as target groups, implementing partners, activities and narrative results may be excluded.

## 8. Data Quality

Frontline AIDS values the quality and consistency of its open data. Therefore historical data or documents being shared retrospectively, which were not created with IATI publication in mind, might compromise data quality and so will not be published.

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

Decisions on excluding information is done by those who are working at the level where the risks can be assessed in detail.

Before publishing to IATI, Frontline AIDS will inform partners and donors of our exclusion policy and ask for their informed consent to publish to IATI. We will inform them of what information will be published about them. They will have the right to request an exclusion, based on these principles. The contract/agreement manager and donor contact in the Frontline AIDS Secretariat are responsible for this process and will document any exclusions that apply for a specific project, with advice from the Lead: Strategic Information. The Project Sponsor is accountable for the final decision on what exclusions are made.

When information to be excluded is identified, Frontline AIDS will take appropriate action. This may include:

- Excluding from publication names of partners involved, or key population groups targeted
- Omitting the name of a partner receiving funds (transactions will be described as going to a 'local CSO' or 'international CSO')
- Excluding details of progress against a results indicator (for example when reporting on advocacy results)
- Omitting the whole activity: Where it is deemed that the risk of publishing information about a project endangers communities or organisations, and that the above steps are not sufficient to mitigate these risks, the entire project may be omitted from publication. In this case full project information will be sent in a closed and responsible way to the donor/s.

### **Openness about the exclusion policy**

Frontline AIDS publishes its exclusion policy on its [website](#).

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

Frontline AIDS will review its data every two years to ensure that data publication is compliant with this exclusion policy. The policy will also be reviewed every 3 years and if necessary adjusted.