

Exclusion Policy

International Aid Transparency Initiative



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 UK Data Protection Act 2018), minimising risks and protecting human rights. Ensuring the safety and security of our partners is our 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 impact of our work.

General principles for exclusion

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

1. External relations

The Human Dignity Trust does not publish data that might harm the relationship with partner governments, partner organisations or donors. All partner organisations and donors are informed upfront about the Trust's policies for publishing project data and have a possibility to request exclusion, based on the principles in this exclusion policy.

2. Protection of children and vulnerable adults

Information that, if placed in the public domain, would contravene the Trust's safeguarding policy, or otherwise put children or vulnerable adults at risk will not be published on IATI.

3. Safety and security

The Human Dignity Trust does not publish data if doing so might pose a risk to the safety or security of any individuals (e.g. partners, suppliers, donors or staff). If the context is particularly high risk, project information such as partner organisations and activities will be excluded; only long-term goals will be published.

4. Personal information

The Human Dignity Trust does not publish any project information that is traceable to an individual 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 We do not publish the names or contact details of individuals.

5. Legal privilege

Information between professional legal advisers and the Human Dignity Trust may not be published on IATI. A professional legal adviser for the purposes of Legal Privilege could be

a solicitor, barrister, licensed conveyancer, or a legal executive holding professional qualifications recognised by the Bar Council of England and Wales.

6. Commercially sensitive information

The Human Dignity Trust does not publish data that might harm the commercial or strategic interests of the Trust, 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 the Trust. This may include details of consultancy fees and salaries.

7. Information that is exempt under other laws, polices and regulations

The Human Dignity Trust 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 the Trust's right to publish the data. The Trust will comply in all respects with applicable data protection law, including the UK Data Protection Act 2018.

8. Cost effectiveness

The Human Dignity Trust 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 the Trust contributes less than £25,000 will not be published, unless there is a specific reason for doing so.

The Trust 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 Trust's discretion if it is cost effective to do so.

9. Impact

The Human Dignity Trust does not publish data that could harm the impact of the Trust in general or the project in particular. For example, we may exclude data on work in certain jurisdictions where our involvement would trigger further backlash against LGBT people and the other communities we serve. 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 implementing partners, activities and narrative results may be excluded.

10. Data quality

The Human Dignity Trust 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

The Human Dignity Trust will inform partners and donors of the exclusion policy and ask for their informed consent before publishing any information concerning them on IATI. They will have the right to request an exclusion, based on these principles. The relevant Legal Department staff member is responsible for this process and will document any exclusions that apply for a specific project. The Head of Legal is accountable for the final decision on what exclusions are made. When information to be excluded is identified, the Trust will take appropriate action. This may include:

- Omitting the Trust's involvement in sensitive court cases
- Excluding from publication names of partners involved
- 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 progress on the passage of a bill)
- 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

The Human Dignity Trust values transparency on its IATI exclusion policy. In line with IATI guidelines, this policy is published on the Trust website.

Review of exclusion policy and quality of data

The Human Dignity Trust will review its data on a regular basis to ensure that data publication is compliant with this exclusion policy. The policy will also be reviewed as necessary.