

# OPEN DATA EXCLUSION POLICY DORCAS

# Introduction

The work of Dorcas is guided by the principle of transparency and openness. Not just for our donors, but also to continuously improve our work as well as collaboration within the humanitarian and development sector.

Therefore Dorcas commits itself to the concept of Open Data regarding IATI. As part of this commitment Dorcas has decided to publish project data in an IATI-compliant way. The IATI standard is a framework for publishing information on development cooperation and humanitarian aid activities in a timely, comprehensive, forward-looking, structured, comparable and open manner.

Dorcas embraces the principle "Open, unless..". Project information is only excluded from publication to IATI if it falls in one of the categories that are presented in this policy.

- Security
- External relations
- Privacy
- Harmful for operations
- Legal/contractual
- Cost effectiveness

Below these categories are further defined.

The Open Data Exclusion Policy applies to all project data published online using the IATI standard. This policy is therefore directed towards, and mandatory for all Dorcas staff engaged in publishing data. The Open Data Exclusion Policy will be made public through our website. Dorcas will continuously work to make our data is as transparent and user-friendly as possible.

# General principles for data exclusion

## SECURITY

Dorcas may exclude data that can reasonably be expected to pose a risk to the physical and / or psychological safety or security of any individual, staff members, offices (and other assets), (groups of) beneficiaries, partners, donors and / or (local) suppliers.

## EXTERNAL RELATIONS

Dorcas may decide not to publish data that might harm the relationship with partners or (back) donors, as well as with (local) governments, institutions, and / or individuals. Our commitment to Open Data and policy on publishing data online will be made known upfront to all stakeholder with the opportunity to request exclusion, based on the principles of stakeholders' internal Exclusion Policy. Dorcas is at all times the final decision-maker for excluding data.



#### PRIVACY

Dorcas is bound by Dutch and European Union rules and regulations concerning data protection and privacy. Therefore, Dorcas cannot publish any project data that is traceable to an individual person and violates the privacy of an individual, unless prior consent of the person involved is requested explicitly and given in writing.

#### HARMFUL FOR OPERATIONS

Dorcas reserves the right to decide on the exclusion of data that, by making it public, might harm the work and / or commercial or strategic interests of Dorcas and / or that of our partners, donors or suppliers, unless the information is publicly available otherwise.

## LEGAL / CONTRACTUAL

Dorcas will not publish any data when this is prohibited under international or national laws, under contracts or agreements, or otherwise legally or contractually forbidden. This applies for example to third parties having a copyright or intellectual property right on certain information, when it is confidential information, or when contractual agreements with donors, partners or suppliers impede Dorcas to publish data.

#### COST EFFECTIVENESS

Dorcas will not publish project data if the costs for publishing the data and / or for obtaining the data are disproportional in relation to the relevance of the data for the public, unless it is contractually or legally obliged to do so.

## Decision-making 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 coordinators and implementing partners. It is possible they mark a project, specific information fields of the IATI standard and/or specific documents as excluded from disclosure in the project administration. This mark automatically excludes the specific information from disclosure. Decisions made on data exclusion will be approved by the director or another delegated authority.

## Review of the Open Data Exclusion Policy

The Open Data Exclusion Policy will be reviewed annually and adjusted if necessary based on its application.