

## EXCLUSION POLICY

(version January 2019)

Our organisation DECP Dutch Employers Cooperation Programme works on the principle that all project information should be published unless a clear reason is provided in accordance to this Exclusion Policy.

We are aware that safe and appropriate collection and use of data to improve the business climate through a better functioning employers' organisation is a critical topic. Together with our partners our organisation develops useful tools and strategies for supporting the partner organisation in their lobby, social dialogue or other activities..

### Introduction

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Dutch Employers Cooperation Programme DECP commits itself to the concept of Open Data and consequently decided to publish project data in an IATI-compliant way. Dutch Employers Cooperation Programme DECP started publishing IATI compliant project data as of 1 January 2016.

DECP 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 partner organisation and government/other NGOs;
- Specific personal information of individual staff and/or partners (e.g. addresses);
- Commercially sensitive information (salaries, consultant fees);
- Information that is exempt under data protection laws or by pre-existing organisational policies.

### General principles for exclusion

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#### *External relations*

Dutch Employers Cooperation Programme DECP does not publish data that might harm the relationship with local governments, partner organisations or our donors, the Dutch Ministry of Foreign Affairs and the Dutch APEX employers' organisation VNO-NCW. All partner organisations and donors are informed upfront about Dutch Employers Cooperation Programme's policies for publishing project data and have a possibility to request exclusion, based on the principles in this exclusion policy. Dutch Employers Cooperation Programme DECP is, at all times, the final decision-maker for exclusion of data.

#### *Security*

Dutch Employers Cooperation Programme DECP 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, groups of beneficiaries, partner organisations, activists, donors or suppliers at risk. From a security point of view it was decided to publish transactions on a cumulative basis per quarter per activity. For the same reason, Results are also published on a cumulative basis as an average per region.

#### *Privacy*

Dutch Employers Cooperation Programme DECP 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.

### *Legal/Contractual*

Dutch Employers Cooperation Programme DECP 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 donors or partner organisations impede Dutch Employers Cooperation Programme DECP the right to publish the data.

### *Cost effectiveness and social impact*

Dutch Employers Cooperation Programme DECP does not publish data if the costs for publishing and/or 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 Dutch Employers Cooperation Programme DECP contribution of < € 5,000 will not be published, unless the project team decides otherwise.

Furthermore Dutch Employers Cooperation Programme DECP does not publish data that could possibly harm the social impact of DECP in general or the related project in particular.

### *Openness about the exclusion policy*

Dutch Employers Cooperation Programme DECP will be transparent about the exclusion policy that DECP applies. This policy will therefore be published.

### *Data Quality*

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

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

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The responsibility for excluding information is at the level where the information can be assessed in detail, i.e. the level of the country managers 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. To be sure that information is rightly excluded from the open policy; the managing director approves the exemption made by the country manager.

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

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On a yearly basis the managing director of Dutch Employers Cooperation Programme DECP will review all data excluded from disclosure. On the one hand it will be reviewed whether data are rightly excluded, on the other hand it will be reviewed whether the exclusion policy is still valid and does not restrict disclosure of data too much.

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