



ZOA OPEN DATA EXCLUSION POLICY

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1 PURPOSE AND RATIONALE

- The work of ZOA is guided by the principles of transparency and accountability; we show what we do and how we do it, and demonstrate that we do as we promise. Based on this, ZOA is committed to the concept of open data. As part of this commitment, ZOA has decided to publish its project data online in a manner compliant to the International Aid Transparency Initiative (IATI) standard.
- 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.
- ZOA embraces the concept of open data based on the general principle of “open, unless ...”. This means that project data is only excluded from publication if it falls under one of the categories presented and laid down in this policy.
- 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 ZOA staff engaged in publishing data. Moreover, this Exclusion Policy is for all those who use the data of ZOA in order to provide reasoning and context regarding our published data and to indicate clearly what ZOA is, and is not able to publish. This will enable data users and others to better understand ZOA’s data.
- The Open Data Exclusion Policy will be made public through our website. ZOA will continuously work to make our data as transparent and user-friendly as possible

2 GENERAL PRINCIPLES FOR EXCLUSION

In principle, all data is published, unless it falls in one of the following categories:

- Information adversely affecting the relations between ZOA, partner organisations, donor organisations government(s), and / or other (I)NGOs;
- Information, including personal information, affecting the safety and security of ZOA staff, partner staff and / or donor staff, or (project) beneficiaries;
- Commercially sensitive information;
- Information labelled as confidential by virtue of an existing agreement between ZOA and a third party;
- Information that is legally restricted from disclosure;
- Information that is exempt under applicable data protection laws or by pre-existing ZOA policies.

Below these categories are further defined.

- **Security**

ZOA does not publish project data that can reasonably be expected to pose a risk to the physical and / or psychological safety or security of any individual, staff members, ZOA offices, (groups of) beneficiaries, partners, donors and / or (local) suppliers.

- **External relations**

ZOA 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. ZOA's commitment to Open Data and policy on publishing data online will be made known upfront to all stakeholders, which will be provided with the opportunity to request exclusion, based on the principles in this Exclusion Policy. ZOA is at all times the final decision-maker for excluding data.

- **Privacy**

ZOA is bound by the Dutch and European Union rules and regulations concerning data protection and privacy. Therefore, ZOA does not 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**

ZOA 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 ZOA and / or that of our partners, donors or suppliers, unless the information is publicly available otherwise. Information on the applicable financial conditions, repayments of loans, investments and guarantees is part of this exclusion and will not be published by ZOA.

- **Legal / Contractual**

ZOA 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 ZOA to publish data.

- **Cost effectiveness**

ZOA 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. As a consequence of this principle, only projects with a budgets over €100,000 will be published, unless the Board decides otherwise.

- **History**

ZOA publishes all project data started after 1 January 2016. Projects from before that date can be included as well, based on their relevance for ZOA and for the public.

- **Openness about Open Data and the Exclusion Policy**

ZOA will be transparent about the Open Data Exclusion Policy. This policy is therefore published online via our website.

3 ADDITIONAL CONSIDERATIONS

3.1 CONSEQUENCES OF APPLYING THE EXCLUSION CATEGORIES

If data falls within one of the categories mentioned in chapter 2, ZOA can decide to publish only parts of the project data or not publish any project data at all. Based on the general principle of open, unless ..., ZOA will try to always publish as much project data as possible.

3.2 DECISION-MAKING ON EXCLUDING DATA

ZOA is, at all times, the final decision-maker for the exclusion of project data. Since in principle all data is published, the responsibility for excluding information is at the level where this information can be assessed in detail (country level). Based on a simple procedure, country teams indicate and explain clearly at the beginning of each project which data should be excluded. This is to be endorsed by the Country Director.

As long as ZOA has no automated system through which project data can directly be send to IATI, the Open Data Officer at ZOA NL will enter the data manually.

Before publishing, the Open Data Officer will check with the respective country Programme and Finance Officer at ZOA NL, and based on the information provided by the country offices, if the data is enterer correctly. Only once this check has been done, will the data be published.

3.3 REVIEW OF THE OPEN DATA EXCLUSION POLICY

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