Developing an Open Information Policy: Guidance for NGOs

1. Introduction

The [International Aid Transparency Initiative (IATI) Standard](#) provides a common way of publishing data on aid flows. It emerged from the transparency principles agreed as part of the Paris Declaration on Aid Effectiveness in 2005, finally being agreed in February 2011. The process of agreeing the standard brought together donor country governments, developing country government, NGOs and aid data experts and aimed to find a way to make information about aid spending easier to find, use and compare.

The UK Department for International Development (DFID), as one of the earliest signatories to the IATI Standard, now requests that all NGO grantees from centrally-managed funds (those with Programme Partnership Arrangements (PPAs), a Global Poverty Action Fund (GPAF) grant or a Civil Society Challenge Fund (CSCF) grant) must publish, as a minimum, IATI compliant data on their DFID funding.

This guidance is intended to provide a useful starting point for NGOs embarking on an organisational process to determine their approach to open information and agreeing the process to decide on what basis to exclude data from publication, whether for the purposes of complying with the IATI Standard, or for broader transparency considerations. However, this is a guide to process, rather than an off-the-shelf policy template. Each organisation should take the time to have a conversation with staff, partners and other stakeholders to consider their attitude to information and how to approach areas of their work that are sensitive to public scrutiny.

2. Rationale for an open information policy

An open information policy should be based on the assumption that **all information should be disclosed unless the policy provides robust reasons for it to be withheld from publication**. The process of developing an open information policy provides an opportunity to commit to the presumption of disclosure and begin creating an organisational culture of transparency, exploring the benefits of greater transparency with staff and partners and starting to embed a proactive approach to information disclosure.

The process may also be a chance to glean input from a wide range of stakeholders in an organisation, ensuring the policy is as meaningful for those working in the UK as those in the field; indeed, it is at field level that greater transparency can often be most transformative, for example in

relationships with partners and beneficiaries, so it is vital that all parts of the organisation are able to contribute to the formulation of an open information policy. It should not be a defensive document but a clear, concise policy that takes into account the specifics of the organisation and the space and style in which it works.

3. Excluding information and data quality

Clear, straightforward criteria to determine what to exclude are vital for ensuring a transparent decision-making process and necessary to explain or justify an organisation's conclusions on exclusions. As mentioned above, the principles of open information and transparency mean that organisations should work on the basis that everything should be published unless there is clear justification for excluding certain items.

As best practice, organisations should routinely make public the number of activities that they have excluded when they publish information, as well as making the decision-making process for deciding on exclusions publicly available.

It may be useful to consider some of the principles of the Freedom of Information Act (2000) as the basic criteria for an open information policy, as DFID does in its exclusion guidance, namely:

A. **International relations**

This could be adapted to the NGO context by considering how the disclosure of certain information may impact on relations between an organisation and the government in the country of operation, or relations with other organisations. For example:
- Organisations undertaking sensitive work on e.g. human rights may want to consider how disclosure might impact on their relationships with local or national government
- Work undertaken in conflict affected or fragile states, where different parts of the country may be under the control of different groups, may need to look at how it approaches its relationships and information disclosure with the various parties

B. **Security and safety**

Information that could put the safety or security of your staff, partners or beneficiaries at risk, for example:
- Names of individuals (staff, partners, beneficiaries, funders)
- Names of organisations (UK NGO, partners, funders)
- Place names / contact details / addresses / locations
- Information that would disclose activities or intentions that may conflict with local and / or government sentiments, e.g. human rights, FGM, political or religious sensitivities
- Other identifying information that could jeopardise safety

C. **Personal information**

For example:
- Names of individuals (staff, partners, beneficiaries, funders)
- Addresses

- Funders who request anonymity

D. <u>Commercially sensitive information</u>

There may be a case to exclude some information based on commercial interests, for example:
- Salaries
- Consultancy fees

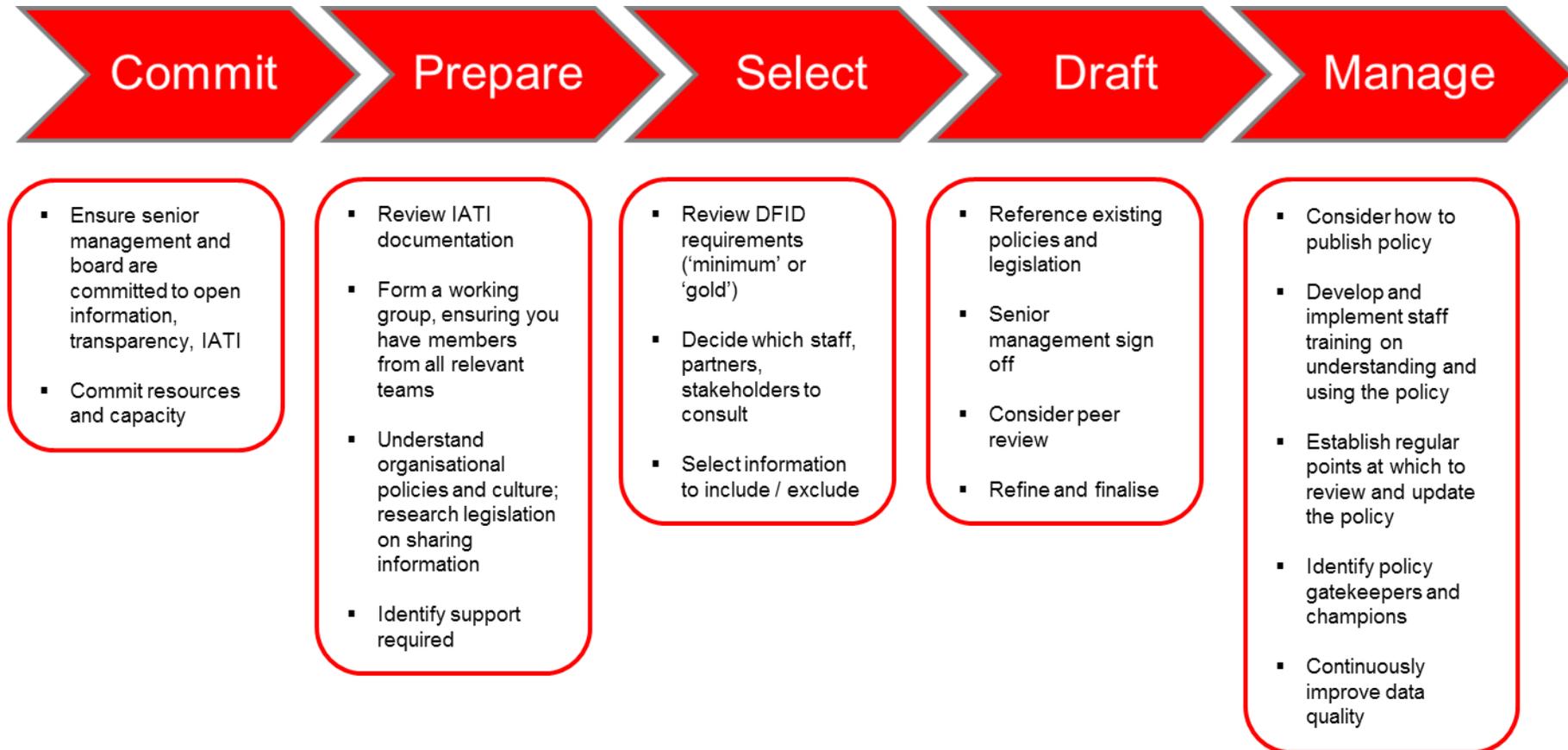**E. Information that is exempt under other laws, policies and regulations**

For example, information that is covered by data protection laws or by pre-existing organisational policies.

4. Data quality

Organisations that have already begun to publish open information have found data quality to be one of the main challenges in this process, particularly when it comes to sharing information that is already held within internal systems but was written or collected without publication in mind.

In the initial stages of publishing more information, particularly retrospectively, organisations may want to consider an exclusion, as DFID has done, along the lines of 'historical project documents that were not produced with publication in mind'. This cannot be a long term justification for excluding data – as a culture of open information and transparency becomes embedded and training improves, staff should be able to produce documents that are suitable for publication and consider criteria in the open information policy – but could be used on a short term basis.

5. Process of drafting and managing an open information policy

Commit	Prepare	Select	Draft	Manage
- Ensure senior management and board are committed to open information, transparency, IATI - Commit resources and capacity	- Review IATI documentation - Form a working group, ensuring you have members from all relevant teams - Understand organisational policies and culture; research legislation on sharing information - Identify support required	- Review DFID requirements ('minimum' or 'gold') - Decide which staff, partners, stakeholders to consult - Select information to include / exclude	- Reference existing policies and legislation - Senior management sign off - Consider peer review - Refine and finalise	- Consider how to publish policy - Develop and implement staff training on understanding and using the policy - Establish regular points at which to review and update the policy - Identify policy gatekeepers and champions - Continuously improve data quality

As detailed in Figure 1, above, there are four key processes that it may be helpful to go through when developing an open information policy:

A. Commit
- Leadership on open information is vital to ensure that appropriate financial resources and staff capacity are available to give transparency the level of importance it warrants
- Commitment at the highest level will enable meaningful consultation to take place across the organisation, specialist expertise to be brought in, as necessary, and the sustainability of an open information approach is embedded in organisational culture and processes

B. Prepare
- Review all the IATI documentation, ensuring there is a common understanding of the information that will be published to the IATI standard
- Consider establishing a small internal working group with representation from across the organisation, although this may not be relevant for smaller organisations. Considering which staff / departments need to be involved in drafting an open information policy may also help you gain greater understanding of support requirements, organisational culture and who else needs to be consulted

C. Select
- Review the standards and decide whether you are publishing to DFID's minimum or gold level for publishing to IATI
- Consider the information required through the lens of existing organisation policies / approaches (i.e. do you already publish similar information?)
- Determine firstly what information you should be publishing, and then discuss the implications for the open information policy
- Consult with relevant staff and other stakeholders to ensure the policy reflects different facets of the organisation and its work

D. Draft
- Draft a policy, ensuring it incorporates / references existing relevant policies and legislation
- Review internally and consider peer review with similar organisations

E. Manage
- Outline how and when the policy will be published
- Consider how staff will gain a strong understanding of how to use the policy
- Develop a proactive management and review process for the open information policy, ensuring it is regularly reviewed and updated as necessary
- Identify a 'gatekeeper' for the policy (this could be the senior management team or the internal working group), who is tasked with the implementation and review process

- Consider identifying open information 'champions' at different levels of the organisation and in different locations
- Organisations should look to continuously monitor and improve the quality of the information that is being collected and shared

6. Ensuring compliance with the policy

Once the policy has been developed and agreed, the process of ensuring that all information published complies with the policy begins. Organisations may benefit from agreeing on an approval process; this could be adapted from existing systems for sharing information externally. It may be helpful to develop a simple checklist to ensure all published information adheres to the policy, for example, DFID use a one page checklist before their information can be published (see the link to Exclusions on the IATI Knowledge Base).

7. Communication

Communicating your intentions towards information disclosure is a key aspect of becoming more transparent. Ideally, your open information policy should be available publicly (e.g. on your website) and all staff, both in the UK and in the field, as well as your partners and other stakeholders, should have a thorough understanding of the rationale behind open information, the benefits of being more transparent, and what the policy says and how to use it, preferably through regular training.

8. Resources

Examples of other organisations' exclusion policies, as well as other related resources, can be found on the IATI Knowledge Base section on Open Information / Exclusions.

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