

## INTERNATIONAL AID TRANSPARENCY INITIATIVE (IATI)

### EXCLUSION POLICY

Mercy Corps Europe (MCE) welcomes moves to improve transparency in the international development sector, and began publishing information in line with IATI guidelines from 30 June 2012.

MCE may choose to exclude data from its IATI disclosures on one or more of the following grounds:

1. **Security and safety:** Information that may pose a risk to the security or safety of any individual, including (but not restricted to) MCE staff and their families, contractors, consultants and beneficiaries.

This exclusion also covers information that would compromise security of physical assets, IT or other office infrastructure.

2. **Protection of children and vulnerable adults:** Information that, if placed in the public domain, would contravene Mercy Corps' Child Protection policy, or otherwise put children or vulnerable adults at risk.
3. **Personal information:** Information that allows identification of one or more person with information about them whose release would put them at risk of damage or distress.

This includes personal staff records, individual salary information, personal communications, sensitive information relating to staff appointment and selection processes and information relating to allegations of staff misconduct.

4. **Commercial sensitivity:** Information that would harm the ability of MCE, or its partners, to successfully compete for similar business in future.
5. **Confidentiality:** Information on MCE relationship with suppliers, contractors, partners, employees and others that would breach confidentiality requirements – stated or implied.
6. **Data protection:** Information that contravenes data protection legislation, best practice or MCE data protection policy.
7. **Legal privilege:** Information between professional legal advisers and Mercy Corps. 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 Institute of Legal Executives (ILEX).
8. **Historical documents:** MCE will not publish data relating to projects programmatically completed before 30 June 2012.
9. **Cost effectiveness:** Information for which the additional cost of disclosure is disproportionate to the transparency benefits of disclosure. MCE is mindful of its duty to avoid excessive administrative costs when delivering its mission.



Where data is excluded on any of the above grounds, such exclusion must be: documented; approved by either the Executive Director, Director of Finance or Assistant Executive Director; and stored appropriately.

Exclusions can cover documents, an element of a project, or an entire project, though the presumption is in favour of disclosure unless MCE is satisfied that one or more of the exclusion criteria is clearly met.

In the spirit of transparency, where adherence to the Exclusion Policy removes whole documents from IATI disclosure, MCE will consider publishing instead summarised description and progress reports drawn direct from its programme management database.