

Access Info Comments on Drafts of Parts One and Four of the IATI Standard

- 1. A right to information-based aid standard.** Access Info welcomes these drafts (part 1 and 4) of the IATI standard. From our research and earlier comments we see a progression in the direction which IATI is taking and welcome that the aid community is now fully embracing the right of access to information. We particularly welcome the inclusion of Freedom of Information Acts as an IATI information item. It is crucial for stakeholders to know that they have a right to ask for further information and under what law(s). We note that in many countries these laws are called "access to information laws" and it may be useful to include that terminology as well.
- 2. Decision making and power structures.** Based on Access Info's extensive monitoring of the citizen's experience of seeking information we notice one particular omission in part one of this draft standard: user guidance information. User guidance information should give the full context in which aid spending takes place, naming all the bodies engaged in aid funding and explaining clearly the responsibilities and functions of each. It should include two fundamental elements: a plan of how each aid-providing body relates to each other at the national level (e.g. how an aid agency relates to a ministry), and a guide to decision-making structures of each aid funding body.
- 3. The ITAI Registry and the need for clear signposting.** Access Info strongly agrees that a one-size-fits-all-approach rarely meet the needs of those searching for information and that publication of information should be structured in ways best tailored to the potential users. However our recent research does suggest a need for caution in free-for-all approaches to how information can be presented. The report "*Not Available! Not Accessible!*" found that detailed information often existed but was often still inaccessible because of a lack of links. In the case of the Spanish Aid Agency, AECID, substantial information was available about some recipient countries on the websites of country offices (e.g. Peru) but these websites were not signposted from central Aid Agency sites and therefore would have been missed by most users. Another problem we founds was that the AiDA and DAC CRS databases are not mentioned on the websites of many national aid agencies so that if a user does not know they exist, they will never find the information they contain. It is therefore essential that the proposed ITAI registry be clearly signposted and be accessible from all possible places where the public will search for aid information.
- 4. Items that should be in the standard.** From Access Info's research into the experience of information seekers and the availability of online information, we recommend that the following classes of information be incorporated into the IATI Standard at the earliest possible date:
 - **Transparency Policies** – alongside obligatory information about access to information or freedom of information laws, donor bodies should make their own transparency policies available should they have these. This may be particularly relevant for those institutions and states which do not have access to information laws but may have disclosure policies (such as the World Bank and other IFIs) or donors or countries still without access to information laws (Spain for example).

This could also be relevant if individual bodies have transparency policies, inspired by the IATI initiative, which go further than their national access to information law. It is also important that not only the laws are mentioned but any procedures that may help information seekers understand what information they can access and how they can go about getting it.

- **Integrity Mechanisms** –Mechanisms to reduce and root out corruption are essential if aid is to be effective. These mechanisms included those recommended by the UN Convention against Corruption, such as assets declarations and gift registers. While anything claimed by a donor to be an anti corruption mechanism should be recognized, we particularly recommend documents relating to prevention of corruption in recipient countries (risk assessments) be promoted and included in the IATI standard as well as registers of gifts given to donor institutions or to officials that should also be kept and published.
- **Complaints and Whistleblower Mechanisms** – Alongside corruption risk assessments the publication of guidance about complaints and whistleblower mechanisms are key integrity mechanisms that should be included in the IATI standard.
- **Document Creation Dates and New Documents Due Dates** – A good practice is not only to provide information about the dates of current documents, but also to tell the user when they can expect the next set of information to become available. We recommend that IATI recognize the good practice of informing the public about when publications were last updated and when the next documents or data sets are expected to be available.

5. Details and Exceptions.

The IATI standard does not yet make clear whether documents are to be published in their entirety or just summaries of the documents. Access Info argues that the documents in the core classes of information listed in Principle 1 of the [Aid Transparency Principles](#) should be published in their entirety. Thus, for example, with contracts not only a summary should be published but the full documents.

In some cases, however, information contained in databases and documents will fall under an exception recognised by international law, such as protection of personal data, protection of commercial interests, etc. The sensitive information will need to be redacted from the documents, which can be done either manually or automatically for certain types of information contained in certain classes of documents. Increasingly, under the IATI process, it should be possible to anticipate the fields of information which will need to be withheld and to set up systems by which the information is automatically exempted, thereby reducing delays in making information available. For example, a database which contains a number of fields including names of private individuals and personal e-mail addresses can be set up so that these fields are removed when the information is made public.

6. Data Formats and Reuse of Information

Access Info's research shows that much aid information is still available in formats which limit reuse, either because it is proprietary software or non-machine readable (such as scanned PDF documents in which it's impossible to do even a simple word search) or because of restrictions on commercial reuse of public sector information. We strongly recommend that the IATI standard includes norms on the format of the information, making it open source, not subject to any reuse limitations, and fully machine readable.

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