



IATI INTERNATIONAL
AID
TRANSPARENCY
INITIATIVE

IATI Implementation Schedule for:

WYG International B.V.

IATI Organisation Identifier:

NL-KVK-06702132

(Click on hyperlink above for more information on IATI Organisation Identifiers)

Version:

2

Date:

21/08/2018

This document provides a publication plan which covers:

1. When will data be published? Timetable and frequency of publication
2. Exclusions and constraints: Overview of exceptions, thresholds & constraints
3. How will data be published? How published data will be presented to users
4. What data will be published? Overview coverage. For each area of the standard:
 - a. Timetable for publication
 - b. Terminology used within the data provider's systems
 - c. Exceptions, thresholds & constraints

Instructions for completion:

The Implementation Schedule is divided into three tabs, with mirrored guidance tabs providing more help in completing the schedule (which should be deleted prior to submitting a completed Implementation Schedule):

1. Publishing Information
2. Organisation Data
3. Activity Data

Publishing Information

This provides space to provide more detailed information about what data will be published, whether there will be any exclusions, and how the data will be published.

This is made up of a mixture of boxes for extracting specific information and text boxes for providing more detailed information.

Many of the boxes for specific information consist of drop-down menus where you will need to select the most appropriate category that fits with the qualitative information you provide in the adjacent text box.

Some require a typed entry:

e.g. Numeric entry for % of total budget (/ODA) and date entries for publication timetable (this should appear in mmm-yy format - e.g. Jan-12).

The purpose of these boxes is to make it easier for users to extract the most pertinent information, whereas the text boxes expand on this to provide more detailed information.

Organisation Data and Activity Data

Although each of these has its own worksheet, the format for completing each is the same.

Each is made up of a table consisting of seven columns:

- 1) Information Area, 2) Status, 3) Publication date, 4) Exclusions & Thresholds, 5) Exclusion category 6) Data provider definition, and 7) Publication notes.

1) Information Area -

this identifies the data item.

2) Status -

this provides a traffic light rating on the readiness of data to be published and is based on the following key:

Fully compliant	Publishing in full compliance with the IATI Standard
Partially compliant	Publishing some data required by the IATI Standard
Future publication	Data will be published at a future date
Under consideration	No current plans to publish, but could be considered
Unable to publish	Information not available or collected, or not relevant to organisation

(The colour coding is auto-generated through use of the drop-down menu.)

For anything less than full compliance, further information should be provided in the publication notes. This includes:

- dates for full compliance if partial compliance is expected initially
- information on future publication of data items - e.g. potential dates or what it is dependent upon (e.g. new management systems)
- under what conditions data items under consideration could be published (e.g. implementing geo-coding or collecting of results data)
- reasons for being unable to publish (e.g. not relevant to the organisation, not part of the organisation's business model, etc.)

3) Publication date -

identifies when data can start being published (this will be based on the overall timetable for publication identified in the 'Publishing Information' tab, and should indicate when in the publication timetable this date item will be published).

The date should appear in mmm-yy format (e.g. Jan-12). If any additional information needs to be provided about the date, this should be added in the 'Publication notes'.

4) Exclusions & Thresholds -

highlights any specific thresholds or exclusions for the data item.

5) Exclusion category -

identifies the reason for the exclusion using the following drop-down menu:

n/a	No exclusions
a	Not applicable to organisation
b	A non-disclosure policy
c	Not currently captured and prohibitive cost
d	Other (please specify within the 'Exclusions & Thresholds narrative)

6) Data provider definition -

provides the terminology used within the organisation's internal systems (this demonstrates how internal terminology maps to IATI).

7) Publication notes -

provides additional information, such as reasons for amber or red coding, or relevant information which is not covered in the preceding columns or requires further clarification.

Support available:

Knowledge Base

The Knowledge Base has a number of forums that provide additional information about getting started and implementing IATI, including discussions on tools, information for NGOs and some technical information.

Information on communication support can also be found here to help in promoting your IATI publication (including examples of existing news releases, templates and contacts).

The Knowledge Base can be found at:

<http://support.iatistandard.org/forums>

Further support

If you require any further support or there are any areas of information you would like to see added, please contact IATI Support:

support@iatistandard.org

1. When will data be published?

Timetable and frequency of publication

Which organisations/agencies/programmes will your IATI data cover? (What % of your total development flows does this cover? What is missing?)

Percentage of total budget / ODA *Narrative*

The data will cover 100% of DFID-funded ODA. Our IATI data will cover all new and ongoing DFID contracts delivered by the legal entities WYG International, WYG Uganda, and WYG International B.V. Please note that the assets and liabilities of WYGI Ltd (IATI organisation identifier GB-COH-3195485) were transferred into WYGI B.V. (IATI organisation identifier NL-KVK-06702132) as of 1 December 2017.

Overall timetable for publication (Provide a date for when these organisations will publish (a) an initial (incomplete) set of IATI data and (b) full IATI implementation)

Date of initial implementation *Date of full implementation* *Narrative*

Dec-15 Jun-16 Full implementation was completed in June 2016.

Timeliness and frequency of publication (How soon after data is captured and available internally will data be published? How frequently will data be published?)

Frequency of publication *Timeliness of publication* *Narrative*

Quarterly 1 Month in arrears We are able to publish the data quarterly, one month after our month end period.

How early in lifecycle will activity details be published? (Will activity details be published during the pipeline/identification stage or not until they are approved and in the implementation stage)

Lifecycle status at publication *Narrative*

Implementation Once approved and contract commences.

Data quality status (Do you want to identify the status of the quality/audit/statistical verification of data that is published in registry? Please indicate whether you anticipate doing this, and the likely timing of moving from unverified data to verified data)

Data quality *Narrative*

Verified We will verify all data internally ahead of publication on a quarterly basis.

Approach to publication (Please outline what staff and system resources are being made available to implement IATI, any relevant organisational structures e.g. working groups, and who is leading on IATI implementation)

System resource *Narrative*

Manual capture through an online tool (web entry platform) Our commercial function oversees publication of IATI data, in conjunction with inputs from finance, business development, compliance, and the digital team.

Other notes

2. What are the exclusions from publication?

Exceptions and constraints: general rules that exclude activities from being published. *Any specific data item exclusions should be listed in the data tables (Organisation data tab and Activity data tab).*

Thresholds (are there any thresholds on the value of activities or transactions to be published. Please specify what the general threshold limits are for publication)

We intend to publish all activities/projects, regardless of their value.

Exclusions (Please identify any rules for excluding data or information that will either be applied automatically or used as a basis to manually exclude publication. Note that exceptions for publication should be kept to a minimum and based on existing national or other regulations)

Our Exclusions Policy is provided in more detail in a separate document.

Any general issues or other constraints

3. How will data be published?

Information for prospective users of information

Licensing (Under which license will data be published: public domain or attribution? If the license does not meet the IATI standard please specify why. Please state whether you intend to use the IATI authorised license or another)

Licence type *Narrative*

Public domain N/A

Definition of an activity and multi-level activities (How is an activity defined e.g. projects and programmes, or some other structure? Do you have multi-tiered project structures e.g. projects and sub-projects or components? At which level do you intend to publish details (e.g. transactions)?)

Multi-level activities reported? *Narrative*

No Activities will be defined as whole projects and programmes

Segmenting data for publication (The recommendation is to publish data segmented by country i.e. one data file for each country. Duplicate project data must not exist within different files, so projects targeting multiple countries or regional/worldwide by nature should be held within a non-country specific file(s). Is this a practical suggestion for your programme? How many projects are not specific to one country and what non-country files best suit your programme?)

Segmentation *Narrative*

By country / region We are satisfied that, given the large capacity available within each file, we can put all multiple country projects together in one file.

Do you intend to provide a user interface in addition to raw (XML) IATI data? (Will IATI data be accessible for end users through an existing or a new user interface on your website? [Note: this is not an IATI requirement])

User interface? *Narrative*

Yes No - our data is accessible on the IATI Registry website.

Organisation

Note: definitions and code lists can be found at:
<http://iatistandard.org/organisation-standard>

Note: For further information or support please go to the Knowledge Base:
<http://support.iatistandard.org/forums>

Information Area	Status	Publication date	Exclusions & Thresholds	Exclusion category	Data provider definition
Annual forward planning budget data for agency	Unable to publish			d) Other	Commercially sensitive
Annual forward planning budget for funded institutions	Unable to publish			a) Not applicable to organisation	
Annual forward planning budget data for countries	Unable to publish			d) Other	Commercially sensitive
Organisation documents	Partially Compliant			b) A non-disclosure policy	

Activities

Information Area	Status	Publication date	Exclusions & Thresholds	Exclusion category	Data provider definition/ Publication Notes
Identification					
Reporting Organisation	Fully compliant	Dec-15		n/a (No exclusions)	Organisation name.
IATI activity identifier	Fully compliant	Dec-15		n/a (No exclusions)	Our unique IATI organisation identifier, combined with our own project number
Other activity identifiers	Fully compliant	Dec-17		n/a (No exclusions)	Previous owner organisation of activity.
Basic Activity Information					
Activity Title	Fully compliant	Dec-15		n/a (No exclusions)	Project name.
Activity Description	Fully compliant	Dec-15		n/a (No exclusions)	Project long description.
Activity Status	Fully compliant	Dec-15		n/a (No exclusions)	Whether the project is being implemented or closed.
Activity Date	Fully compliant	Dec-15		n/a (No exclusions)	Start and end dates as per contract.
Contact Info	Partially compliant	Dec-15	No individual staff names or contact details will be included.	b) A non-disclosure policy	Website address and general contact email.
Activity scope	Unable to publish	Aug-18		a) Not applicable to organisation	
Participating Organisations					
Participating Organisation (Funding)	Fully compliant	Dec-15		n/a (No exclusions)	Organisation providing the funds for this activity.
Participating Organisation (Extending)	Fully compliant	Dec-15		n/a (No exclusions)	Will provide details if applicable to the activity.
Participating Organisation (Implementing)	Fully compliant	Dec-15		n/a (No exclusions)	Will be the reporting organisation.
Participating Organisation (Accountable)	Fully compliant	Dec-15		n/a (No exclusions)	Will be the reporting organisation.
Geopolitical Information					
Recipient Country	Fully compliant	Dec-15		n/a (No exclusions)	Country where the project is being run.
Recipient Region	Fully compliant	Aug-18		n/a (No exclusions)	Region where the project is being run.
Sub-national Geographic Location	Unable to publish			c) Not currently captured and prohibitive cost	A certain level of information may be available for some activities, but at this time not for all activities.
Classifications					
Sector	Fully compliant	Dec-17		n/a (No exclusions)	OECD DAC CRS Purpose Codes (5 Digit).
Policy Marker	Unable to publish			a) Not applicable to organisation	
Collaboration Type	Unable to publish			a) Not applicable to organisation	
Default Flow Type	Fully compliant	Dec-15		n/a (No exclusions)	10 - ODA.
Default Finance Type	Fully compliant	Dec-15		n/a (No exclusions)	110 - Standard grant.
Default Aid Type	Fully compliant	Dec-15		n/a (No exclusions)	C01.
Default Tied Status	Fully compliant	Dec-15		n/a (No exclusions)	5 - Untied
Country budget items	Unable to publish			a) Not applicable to organisation	
Financial					
Budget	Fully compliant	Dec-15		n/a (No exclusions)	The annual budget for project by financial year (April - March).
Planned Disbursement	Unable to publish	Jun-16		d) Other	Commercially sensitive.
Capital Spend	Unable to publish	Aug-18		a) Not applicable to organisation	
Financial transaction (Incoming Commitment)					
Financial transaction (Incoming Funds)	Fully compliant	Dec-15		n/a (No exclusions)	Funds received from donor.
Financial transaction (Commitment)	Fully compliant	Dec-15		n/a (No exclusions)	The total budget for this project.
Financial transaction (Disbursement & Expenditure)	Fully compliant	Jun-16		n/a (No exclusions)	Includes expenditure on sub-contractors.
Related Documents					
Activity Documents	Partially compliant	Dec-15		d) Other	We will publish documents relevant to a specific activity (e.g. logframes, ToR), as long as not commercially sensitive.
Activity Website	Unable to publish	Dec-15		a) Not applicable to organisation	
Relations					
Related Activity	Fully compliant	Dec-15			Where applicable, we will publish related programme or project level activities to this particular activity.

Performance					
Legacy data	Unable to publish			a) Not applicable to organisation	
Conditions attached Y/N	Unable to publish			a) Not applicable to organisation	
Text of Conditions	Unable to publish			a) Not applicable to organisation	
Results data	Unable to publish			a) Not applicable to organisation	
CRS	Unable to publish			a) Not applicable to organisation	
FSS	Unable to publish			a) Not applicable to organisation	

WYG Exclusions Policy: International Aid Transparency Initiative – “IATI”

For its projects funded by the international donor/financial institution community, WYG commits to publishing project-related data insofar as required by the IATI principles and by its relevant clients (“Data”).

In order to comply with WYG’s broader legal obligations, including but not limited to those under statute and common law, certain exclusions shall apply to the above policy.

These are where:

1. the Data:
 - a. concerns the safeguarding of national security or a body dealing with such;
 - b. is held for the purpose of certain investigations and/or proceedings;
 - c. is *personal data* (for the purposes of the Data Protection legislation, including the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679));
 - d. is legally privileged; or
 - e. is commercially confidential or constitutes a trade secret;
2. disclosure of such Data would be likely to prejudice:
 - a. UK defence or armed forces;
 - b. international relations (or is confidential information obtained from an overseas state);
 - c. the business interests of any person; or
 - d. an individual's health or safety;
3. disclosure of such Data:
 - a. would constitute a breach of confidence actionable by the owner of that information;
 - b. is not allowed by law, court of competent authority or any regulatory body (including but not limited the London Stock Exchange); or
 - c. could affect intellectual property rights.

This policy shall be reviewed by WYG on an annual basis.

For further information on this policy and WYG’s approach to IATI, please contact nottingham@wyg.com



IATI Implementation Schedule for:

Upper Quartile

IATI Organisation Identifier:

GB-COH-SO301345

(Click on hyperlink above for more information on IATI Organisation Identifiers)

Version:

2

Date:

21/08/2018

This document provides a publication plan which covers:

1. When will data be published? Timetable and frequency of publication
2. Exclusions and constraints: Overview of exceptions, thresholds & constraints
3. How will data be published? How published data will be presented to users
4. What data will be published? Overview coverage. For each area of the standard:
 - a. Timetable for publication
 - b. Terminology used within the data provider's systems
 - c. Exceptions, thresholds & constraints

Instructions for completion:

The Implementation Schedule is divided into three tabs, with mirrored guidance tabs providing more help in completing the schedule (which should be deleted prior to submitting a completed Implementation Schedule):

1. Publishing Information
2. Organisation Data
3. Activity Data

Publishing Information

This provides space to provide more detailed information about what data will be published, whether there will be any exclusions, and how the data will be published.

This is made up of a mixture of boxes for extracting specific information and text boxes for providing more detailed information.

Many of the boxes for specific information consist of drop-down menus where you will need to select the most appropriate category that fits with the qualitative information you provide in the adjacent text box.

Some require a typed entry:

e.g. Numeric entry for % of total budget (/ODA) and date entries for publication timetable (this should appear in mmm-yy format - e.g. Jan-12).

The purpose of these boxes is to make it easier for users to extract the most pertinent information, whereas the text boxes expand on this to provide more detailed information.

Organisation Data and Activity Data

Although each of these has its own worksheet, the format for completing each is the same.

Each is made up of a table consisting of seven columns:

- 1) Information Area, 2) Status, 3) Publication date, 4) Exclusions & Thresholds, 5) Exclusion category 6) Data provider definition, and 7) Publication notes.

1) Information Area -

this identifies the data item.

2) Status -

this provides a traffic light rating on the readiness of data to be published and is based on the following key:

Fully compliant	Publishing in full compliance with the IATI Standard
Partially compliant	Publishing some data required by the IATI Standard
Future publication	Data will be published at a future date
Under consideration	No current plans to publish, but could be considered
Unable to publish	Information not available or collected, or not relevant to organisation

(The colour coding is auto-generated through use of the drop-down menu.)

For anything less than full compliance, further information should be provided in the publication notes. This includes:

- dates for full compliance if partial compliance is expected initially
- information on future publication of data items - e.g. potential dates or what it is dependent upon (e.g. new management systems)
- under what conditions data items under consideration could be published (e.g. implementing geo-coding or collecting of results data)
- reasons for being unable to publish (e.g. not relevant to the organisation, not part of the organisation's business model, etc.)

3) Publication date -

identifies when data can start being published (this will be based on the overall timetable for publication identified in the 'Publishing Information' tab, and should indicate when in the publication timetable this date item will be published).

The date should appear in mmm-yy format (e.g. Jan-12). If any additional information needs to be provided about the date, this should be added in the 'Publication notes'.

4) Exclusions & Thresholds -

highlights any specific thresholds or exclusions for the data item.

5) Exclusion category -

identifies the reason for the exclusion using the following drop-down menu:

n/a	No exclusions
a	Not applicable to organisation
b	A non-disclosure policy
c	Not currently captured and prohibitive cost
d	Other (please specify within the 'Exclusions & Thresholds narrative)

6) Data provider definition -

provides the terminology used within the organisation's internal systems (this demonstrates how internal terminology maps to IATI).

7) Publication notes -

provides additional information, such as reasons for amber or red coding, or relevant information which is not covered in the preceding columns or requires further clarification.

Support available:

Knowledge Base

The Knowledge Base has a number of forums that provide additional information about getting started and implementing IATI, including discussions on tools, information for NGOs and some technical information.

Information on communication support can also be found here to help in promoting your IATI publication (including examples of existing news releases, templates and contacts).

The Knowledge Base can be found at:

<http://support.iatistandard.org/forums>

Further support

If you require any further support or there are any areas of information you would like to see added, please contact IATI Support:

support@iatistandard.org

1. When will data be published?

Timetable and frequency of publication

Which organisations/agencies/programmes will your IATI data cover? (What % of your total development flows does this cover? What is missing?)

Percentage of total budget / ODA *Narrative*

The data will cover 100% of DFID-funded ODA. Our IATI data will cover all new and ongoing DFID contracts delivered by the legal entity Upper Quartile.

Overall timetable for publication (Provide a date for when these organisations will publish (a) an initial (incomplete) set of IATI data and (b) full IATI implementation)

Date of initial implementation *Date of full implementation* *Narrative*

Dec-15 Jun-16 Full implementation was completed in June 2016.

Timeliness and frequency of publication (How soon after data is captured and available internally will data be published? How frequently will data be published?)

Frequency of publication *Timeliness of publication* *Narrative*

Quarterly 1 Month in arrears We are able to publish the data quarterly, one month after our month end period.

How early in lifecycle will activity details be published? (Will activity details be published during the pipeline/identification stage or not until they are approved and in the implementation stage)

Lifecycle status at publication *Narrative*

Implementation Once approved and contract commences.

Data quality status (Do you want to identify the status of the quality/audit/statistical verification of data that is published in registry? Please indicate whether you anticipate doing this, and the likely timing of moving from unverified data to verified data)

Data quality *Narrative*

Verified We will verify all data internally ahead of publication on a quarterly basis.

Approach to publication (Please outline what staff and system resources are being made available to implement IATI, any relevant organisational structures e.g. working groups, and who is leading on IATI implementation)

System resource *Narrative*

Manual capture through an online tool (web entry platform) Our commercial function oversees publication of IATI data, in conjunction with inputs from finance, business development, compliance, and the digital team.

Other notes

2. What are the exclusions from publication?

Exceptions and constraints: general rules that exclude activities from being published. *Any specific data item exclusions should be listed in the data tables (Organisation data tab and Activity data tab).*

Thresholds (are there any thresholds on the value of activities or transactions to be published. Please specify what the general threshold limits are for publication)

We intend to publish all activities/projects, regardless of their value.

Exclusions (Please identify any rules for excluding data or information that will either be applied automatically or used as a basis to manually exclude publication. Note that exceptions for publication should be kept to a minimum and based on existing national or other regulations)

Our Exclusions Policy is provided in more detail in a separate document.

Any general issues or other constraints

3. How will data be published?

Information for prospective users of information

Licensing (Under which license will data be published: public domain or attribution? If the license does not meet the IATI standard please specify why. Please state whether you intend to use the IATI authorised license or another)

<i>Licence type</i>	<i>Narrative</i>
Public domain	N/A
Definition of an activity and multi-level activities (How is an activity defined e.g. projects and programmes, or some other structure? Do you have multi-tiered project structures e.g. projects and sub-projects or components? At which level do you intend to publish details (e.g. transactions)?)	
<i>Multi-level activities reported?</i>	<i>Narrative</i>
No	Activities will be defined as whole projects and programmes
Segmenting data for publication (The recommendation is to publish data segmented by country i.e. one data file for each country. Duplicate project data must not exist within different files, so projects targeting multiple countries or regional/worldwide by nature should be held within a non-country specific file(s). Is this a practical suggestion for your programme? How many projects are not specific to one country and what non-country files best suit your programme?)	
<i>Segmentation</i>	<i>Narrative</i>
By country / region	We are satisfied that, given the large capacity available within each file, we can put all multiple country projects together in one file.
Do you intend to provide a user interface in addition to raw (XML) IATI data? (Will IATI data be accessible for end users through an existing or a new user interface on your website? [Note: this is not an IATI requirement])	
<i>User interface?</i>	<i>Narrative</i>
Yes	No - our data is accessible on the IATI Registry website.

Organisation

Note: definitions and code lists can be found at:
<http://iatistandard.org/organisation-standard>

Note: For further information or support please go to the Knowledge Base:
<http://support.iatistandard.org/forums>

Information Area	Status	Publication date	Exclusions & Thresholds	Exclusion category	Data provider definition
Annual forward planning budget data for agency	Unable to publish			d) Other	Commercially sensitive
Annual forward planning budget for funded institutions	Unable to publish			a) Not applicable to organisation	
Annual forward planning budget data for countries	Unable to publish			d) Other	Commercially sensitive
Organisation documents	Partially Compliant			b) A non-disclosure policy	

Activities

Information Area	Status	Publication date	Exclusions & Thresholds	Exclusion category	Data provider definition/ Publication Notes
Identification					
Reporting Organisation	Fully compliant	Dec-15		n/a (No exclusions)	Organisation name.
IATI activity identifier	Fully compliant	Dec-15		n/a (No exclusions)	Our unique IATI organisation identifier, combined with our own project number
Other activity identifiers	Unable to publish	Dec-15		a) Not applicable to organisation	
Basic Activity Information					
Activity Title	Fully compliant	Dec-15		n/a (No exclusions)	Project name.
Activity Description	Fully compliant	Dec-15		n/a (No exclusions)	Project long description.
Activity Status	Fully compliant	Dec-15		n/a (No exclusions)	Whether the project is being implemented or closed.
Activity Date	Fully compliant	Dec-15		n/a (No exclusions)	Start and end dates as per contract.
Contact Info	Partially compliant	Dec-15	No individual staff names or contact details will be included.	b) A non-disclosure policy	Website address and general contact email.
Activity scope	Unable to publish	Aug-18		a) Not applicable to organisation	
Participating Organisations					
Participating Organisation (Funding)	Fully compliant	Dec-15		n/a (No exclusions)	Organisation providing the funds for this activity.
Participating Organisation (Extending)	Fully compliant	Dec-15		n/a (No exclusions)	Will provide details if applicable to the activity.
Participating Organisation (Implementing)	Fully compliant	Dec-15		n/a (No exclusions)	Will be the reporting organisation.
Participating Organisation (Accountable)	Fully compliant	Dec-15		n/a (No exclusions)	Will be the reporting organisation.
Geopolitical Information					
Recipient Country	Fully compliant	Dec-15		n/a (No exclusions)	Country where the project is being run.
Recipient Region	Fully compliant	Aug-18		n/a (No exclusions)	Region where the project is being run.
Sub-national Geographic Location	Unable to publish			c) Not currently captured and prohibitive cost	A certain level of information may be available for some activities, but at this time not for all activities.
Classifications					
Sector	Fully compliant	Dec-17		n/a (No exclusions)	OECD DAC CRS Purpose Codes (5 Digit).
Policy Marker	Unable to publish			a) Not applicable to organisation	
Collaboration Type	Unable to publish			a) Not applicable to organisation	
Default Flow Type	Fully compliant	Dec-15		n/a (No exclusions)	10 - ODA.
Default Finance Type	Fully compliant	Dec-15		n/a (No exclusions)	110 - Standard grant.
Default Aid Type	Fully compliant	Dec-15		n/a (No exclusions)	C01.
Default Tied Status	Fully compliant	Dec-15		n/a (No exclusions)	5 - Untied
Country budget items	Unable to publish			a) Not applicable to organisation	
Financial					
Budget	Fully compliant	Dec-15		n/a (No exclusions)	The annual budget for project by financial year (April - March).
Planned Disbursement	Unable to publish	Jun-16		d) Other	Commercially sensitive.
Capital Spend	Unable to publish	Aug-18		a) Not applicable to organisation	
Financial transaction (Incoming Commitment)					
Financial transaction (Incoming Funds)	Fully compliant	Dec-15		n/a (No exclusions)	Funds received from donor.
Financial transaction (Commitment)	Fully compliant	Dec-15		n/a (No exclusions)	The total budget for this project.
Financial transaction (Disbursement & Expenditure)	Fully compliant	Jun-16		n/a (No exclusions)	Includes expenditure on sub-contractors.
Related Documents					
Activity Documents	Partially compliant	Dec-15		d) Other	We will publish documents relevant to a specific activity (e.g. logframes, ToR), as long as not commercially sensitive.
Activity Website	Unable to publish	Dec-15		a) Not applicable to organisation	

Relations				
Related Activity	Fully compliant	Dec-15		Where applicable, we will publish related programme or project level activities to this
Performance				
Legacy data	Unable to publish		a) Not applicable to organisation	
Conditions attached Y/N	Unable to publish		a) Not applicable to organisation	
Text of Conditions	Unable to publish		a) Not applicable to organisation	
Results data	Unable to publish		a) Not applicable to organisation	
CRS	Unable to publish		a) Not applicable to organisation	
FSS	Unable to publish		a) Not applicable to organisation	

Upper Quartile Exclusions Policy: International Aid Transparency Initiative – “IATI”

For its projects funded by the international donor/financial institution community, Upper Quartile commits to publishing project-related data insofar as required by the IATI principles and by its relevant clients (“Data”).

In order to comply with Upper Quartile’s broader legal obligations, including but not limited to those under statute and common law, certain exclusions shall apply to the above policy.

These are where:

1. the Data:
 - a. concerns the safeguarding of national security or a body dealing with such;
 - b. is held for the purpose of certain investigations and/or proceedings;
 - c. is *personal data* (for the purposes of the Data Protection legislation, including the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679));
 - d. is legally privileged; or
 - e. is commercially confidential or constitutes a trade secret;
2. disclosure of such Data would be likely to prejudice:
 - a. UK defence or armed forces;
 - b. international relations (or is confidential information obtained from an overseas state);
 - c. the business interests of any person; or
 - d. an individual's health or safety;
3. disclosure of such Data:
 - a. would constitute a breach of confidence actionable by the owner of that information;
 - b. is not allowed by law, court of competent authority or any regulatory body (including but not limited the London Stock Exchange); or
 - c. could affect intellectual property rights.

This policy shall be reviewed by Upper Quartile on an annual basis.

For further information on this policy and Upper Quartile’s approach to IATI, please contact info@upperquartile.co.uk.