

## **Joint submission to DFID Consultation on the UK Aid Transparency Guarantee**

The UK Aid Network (UKAN) and organisations undersigned welcome the UK Aid Transparency Guarantee, and we are pleased to have the opportunity to input to the consultation. We strongly welcome the inclusion in the Guarantee the focus on achieving transparency across the international aid system and the formation of international standards through the International Aid Transparency Initiative (IATI).

This document sets out the areas where we believe the Guarantee would benefit from further development to ensure that it fulfils its promising potential.

### **Overarching points**

1. The UK Aid Guarantee should cover all UK aid, and not just that managed by DFID. The Guarantee should thus include a timeline for extending its remit across all government departments.
2. A critical first step for the Guarantee will be to map the proposal to the original long list of IATI types of information. A distinction then needs to be made between what is disclosed via the IATI agreement and what is additional both to the first phase of IATI, and to the later phases.
3. UK international leadership is an essential element of the Guarantee for ensuring maximum value for money for DFID's investment in better UK aid transparency. It is vital to ensure the comprehensiveness and comparability of aid information, because the major impact of greater information will be when we are able to map UK aid to that of other donors and recipients. The UK has an important role in ensuring widespread observance of IATI guidelines and in extending its involvement to cover other partners as signatories, endorsers and observers. Accordingly, the emphasis should be placed on:
  - a. The formation of international standards;
  - b. Leading by example;
  - c. Ensuring the link to recipient budgets is built in to aid transparency efforts.
4. There should be a more explicit presumption of the principle of proactive disclosure of all information, with non-disclosure limited to legitimate exceptions which should be subject to both a harm test and a balancing against the public interest in disclosure of the information.
5. We are concerned about the exemptions on the grounds of security and commercial confidentiality. There should be a more explicit list of criteria for determining what exactly will be exempt, a clear and publicly available process for evaluating what would merit an exemption as well as clarity around the appeals process. Would this be managed by the Information Commissioner?
6. Procurement databases and information should be joined up with project databases so that the whole process can be seen transparently and in context.

### **What should be published**

1. The commitment should be to publish information and not documents per se (see Annex 1); the documents should then be mapped back to information types listed in the table. This should include:
  - a. Decision-making and consultation processes
  - b. Full terms of the contract or agreement – including conditions/benchmarks etc
  - c. Who to contact for more information regarding this information
  - d. Forward information - covering the whole project lifecycle - and mapped to country and programme information.
2. The administrative activities and budget needs to be covered as well as the currently proposed programme activities.
3. Like the broader Coalition transparency agenda and Government 2.0 work that is ongoing, the initial focus needs to be on the disclosure of raw data. The accessibility of the information is important, but the principle should be of raw data as a minimum.
4. Unique identifiers should be provided to link procurement data through to project awards.
5. Joint projects with other donors should be included in the Guarantee.

### **Accessibility**

The underlying principles around accessibility should include:

1. A recognition that if information is not available then it can't be accessible. The role of DFID should be about enabling, fostering, and supporting accessibility of aid information. This implies conceptually separating the important activities of DFID public communications from aid information accessibility agendas.
2. There should be a focus on open licensing and ensuring that the material is machine readable and processable. The aim is to make information available in ways that maximize the levels of access, use and reuse.
3. The emphasis should be on ensuring that work in this area strengthens and builds domestic accountability of recipient countries.

#### *Practical implications for this include:*

4. Licensing and re-use rights: the data should be released into the public domain and there should be no restrictions on what people can do with it.
5. Fund others to do undertake accessibility efforts with a focus on making it demand-led and balanced, using "info-mediaries", equivalent to the role that MySociety has played in the UK.
6. Everything funded and undertaken in this area should be open source.
7. Link, shared data techniques and semantic enablement of data should be included.
8. We would suggest that the Guarantee should include a thorough stock-take after a year of how the Guarantee and IATI are working in practice. A key element in this review would be the development of a more detailed plan to address accessibility issues.

### **UK leadership of global aid transparency agenda**

1. Comparability will be the big benefit from the release of a more comprehensive set of the largest volumes of aid.
2. In terms of prioritisation, the efforts of the UK should be on ensuring the Guarantee fosters and coordinates with the transparency efforts where the greatest impact can result. The UK is a major funder of some of the largest donors (the European Commission and the World Bank) and can and should use its engagement with the US on American aid transparency efforts to act as a powerful champion, working with this group in leading by example.
3. Obvious short term international fora in which this leadership should be exercised include the Millennium Development Goals summit, negotiations on IDA-16 replenishment and the European Foreign Affairs Council. This agenda also needs to be fully integrated and championed in the process running up to the Fourth High Level Forum on Aid Effectiveness in 2011. Greater aid transparency is essential to delivering on the objectives and terms of the Paris Declaration and the Accra Agenda for Action.

### **Transparency in Civil Society Organisations**

1. As CSOs we attach a great importance to high standards of transparency in our own organisations and as you note, a number of efforts are ongoing in the sector to address this. Linking these up where appropriate with donor efforts is a clear next step. In order to take this forward we suggest DFID should establish a mechanism with CSOs to draw in the corporate governance, Monitoring and Evaluation, and the reporting elements of organisations (rather than on advocacy and policy).
2. The forum that seems to be the most appropriate place to push this forward is the January IATI Technical Advisory Group meeting on NGO transparency.

### **Partner countries and the transparency of their own information**

1. Transparency of recipient governments to their citizens is a fundamental and important element of development, and there are clearly potential linkages to the success of aid efforts from transparency reforms in partner countries. However, donors and aid agencies should become more transparent whether or not recipient countries become more transparent; part of what donors need to do to support recipient countries is to provide better aid information to their governments and citizens.
2. While the linkage and reference to these improvements should be made in the UK Aid Transparency Guarantee they should not be included within its terms.
3. In order to ensure that UK aid transparency, and broader aid transparency efforts, strengthen domestic accountability, aid information must be presented in a way that can be integrated within recipient country systems. At a minimum this means bringing aid information 'on budget',

which has key implication for the timing and formatting of information disclosed. Ensuring aid information is fully integrated in to recipient budgets is a prerequisite for the development of meaningful parliamentary oversight and audit functions.

4. More broadly, partner country transparency should not be included as conditionality but should be part of DFID's work to develop Country-Led Approaches (CLA), accountability and empowerment in order to support recipient country budget transparency and the development of Freedom of Information rights. DFID should support partner country transparency following consultation with community groups and organisations that are already working to increase partner government transparency whether that is at the local or national level.

**Joint submission from: ActionAid, CAFOD, International HIV/AIDS Alliance, ONE, Open Knowledge Foundation, Oxfam, Publish What You Fund, RESULTS UK, Save the Children, Transparency International UK and World Vision**

## Annex 1 – types of information

IATI Info Type code	IATI Info code	Info Name	Proposed Definition/Data
01	08	Annual forward planning budget data for agency	The <i>total development budget</i> for each of the next three years (or most detailed available) on a rolling basis. For donor agencies as submitted to parliament; for foundations or multilaterals as submitted to the board.
01	10	Annual forward planning budget data of funded institutions	The budget for each of the next three years (or most detailed available) on a rolling basis for each institution (i.e. multilateral organisations, INGOs, foundations and others) that receives core funding from the donor.
01	12	Annual forward planning budget data of country offices	The <i>budget</i> for assistance to each recipient for each of the next three years (or most detailed available) on a rolling basis.
03	01	Funding Country/Institution	The country or institution which provides the funds.
03	02	Extending Agency	The government entity (central, state or local government agency or department), or agency within an institution, financing the activity from its own budget.
03	03	Additional channels of delivery/ implementing agencies	Channels of delivery are implementing agencies acting as intermediaries between the extending agency and the ultimate beneficiary. They can be public sector, non-governmental agencies (NGOs), Public -Private partnerships, or multilateral institutions. Also known as executing agency.
03	04	Beneficiary Agency/Organisation	The government agency, civil society or private sector institution of the recipient country, which ultimately benefits from the implementation of the project
03	05	Recipient Country	The country for whose benefit the aid flow is provided if applicable and identifiable; otherwise the region if applicable.
03	06	Bilateral or Multilateral Type	Identifier to show if the flow is bilateral; core multilateral; core contribution to NGOs/PPPs; or multilateral outflow.

03	07	Flow Type	Identifies if the aid activity is Official Development Assistance (ODA), Other Official Flows (OOF), private market flows, or other flows.
03	07.1	Type of Aid	The type of assistance provided (such as budget support, pooled funds, project interventions, experts, scholarships, debt relief, administrative costs)
03	08	Finance Type	The financing mechanism of the aid activity (e.g. grant, loan, capital subscription, export credit, debt relief).
03	09	Aid Activity ID (multiple values)	Alpha/numeric code(s) to record an individual aid activity.
03	10	Project Title & Purpose/ Description (two fields)	Title or short description of the activity (preferably official name used in project documents) Long description summarising the specific purpose or objective of the activity
03	11	Recipient Budget Identifier	The recipient country budget classification where the activity is included in the recipient budget.
03	12	General / Detailed Sector	The specific area(s) of the recipient's economic or social development that the transfer intends to foster. Also known as purpose code.
03	13	Project Dates	The expected and actual start and completion dates of the activity, where start is the date of first disbursement for the activity and completion is the date of last disbursement for the activity.
03	14	Project Status / Stage	The current stage of the activity at the time the IATI information is published/updated. The stages are based on a project lifecycle.
03	15	Project contacts (multiple entries)	Contact details for the activity
03	16	Detailed geographic info	The administrative region(s) intended to benefit from the activity. Where possible the geo-code(s) for the location(s) of the final beneficiary(ies) of the activity.
03	17	Tied Aid Status	Amounts by degree of restriction on where procurement of goods

			or services can take place, classified as untied (open procurement), partially tied (donor and developing countries) and tied (donor or group not including most developing countries).
03	18	Policy/Thematic Markers (multiple entries)	A score indicating if the activity addresses the policy/theme as a principal or significant objective or not at all.
Financial data	Currency		
04	01	Total project cost (including all donors and any government funds)	The total value of the activity (committed) from <i>all funding sources</i> (including counterpart funds) as stated in the project design document, MoU or equivalent document; in the currency in which it is stated.
04	02	Annual project budgets	The value of the budget for the activity <i>from the reporting donor</i> for the duration of the activity, as stated in the project design document, MoU or equivalent document
04	03	Amount(s) committed by individual donor (multiple entries)	The date and amount of <i>each</i> commitment by the donor; a commitment is a firm written obligation by the donor to provide resources of a specified amount under specified financial terms and conditions and for specified purposes for the benefit of the recipient.
04	05	Planned disbursements or payments (multiple entries)	The amount it is planned to disburse on the activity in <i>each</i> of the next three calendar years and financial years of the recipient.
04	06	Actual Disbursements or payments	The amount placed at the disposal of a recipient country or agency (in the case of internal development-related expenditures, the outlay of funds).
04	07	Loan repayments	The amount of principal (amortisation) actually repaid, including any arrears.
04	08	Interest repayments	The amount of interest actually repaid.
05	01	Outputs and outcomes indicators	The results or pre-defined outputs of the activity as specified in the project design document, the MoU or equivalent.
05	02	Results indicators	The final results or final outputs of the activity as presented in the

06	01	Project specific Paris Declaration indicators	completion report (02 10) in relation to the pre-defined outputs as specified in the project design document, the MoU or equivalent. To be developed for any Paris Declaration indicators that it is relevant to capture at activity level.
06	02	Conditions	Conditions governing funding for the activity as presented in the project design document, the MoU or equivalent.
06	03	Publication date of IATI Information	The date of the submission of each information element to the IATI registry