



ICF Policy Statement on:
DFID Aid Transparency

1. Purpose

The purpose of this policy is to provide guidance on ICF's approach to the disclosure of expenditure data to the United Kingdom Department for International Development ("DFID").

2. Applicable Audience

This policy applies to all ICF employees and offices employed in the provision of services under contract to DFID for Aid Projects. This policy applies to ICF project work for DFID Aid Projects only and is not applicable to the remainder of ICF's global business.

3. Policy

3.1. DFID Aid Transparency

ICF notes that aid transparency is an important component of development assistance. It aims to help governments, organisations, and citizens in both donor and recipient countries to harness the International Aid Transparency Initiative (IATI) to improve development outcomes.

At this time, ICF will commit to publishing quarterly expenditure related only to the United Kingdom's Department for International Development (DFID) contracts, which may be followed by contracts for other donors in time. ICF will also assist its first tier of sub-contractors to do the same. We will use AidStream to publish our information. Published data will be derived from sums invoiced and paid by ICF's first tier subcontractors and sums invoiced by ICF and paid by DFID.

A copy of this policy will be maintained on the IATI Registry.

3.2. Jurisdiction

This policy applies to all contracts placed by DFID with ICF's european operating entities. This policy applies to ICF project work for DFID and is not applicable to the remainder of ICF's global business.

3.3. Exclusions Policy

The following exclusions policy for ICF will be applied, in line with DFID's exemption criteria.

I. International Relations: Information that may damage the interests of the United Kingdom or harm DFID's relations with other governments or institutions.

II. Security and Safety: Information that may pose a risk to the security or safety of any individual, including DFID staff, ICF staff and sub-contractors, and beneficiaries. This includes circumstances of volatility from a security or political economy perspective and for this reason the identities of ICF suppliers based in fragile states will be redacted from disclosure documents.

III. Personal information: In accordance with the Data Protection Act 1988

Information which if disclosed would constitute breach of the Data Protection Act or other applicable legislation and regulation in any jurisdiction.

IV. Commercially Sensitive Information: Information which if disclosed could harm DFID's or DFID's partners' or ICF's commercial interests or which is otherwise disclosed to ICF in confidence or under similar restrictions. This includes but is not limited to trade secrets and information concerning specific daily or hourly fee rates.

V. Scale: De minimis arrangements will operate under which information relating to DFID projects less than £100,000 in value will not normally be disclosed. Data will also not normally be disclosed where individual ICF suppliers are sole traders or small enterprises with less than 5 employees and/or in circumstances where suppliers may be unable to access regular internet at sufficient speed to upload data. ICF will however provide aggregated data in relation to sole traders and small enterprises and there may be circumstances in which ICF decide that disclosure of data related to specific sole traders and small enterprises is justified by the scale of expenditure.

VI. Information that is exempt from disclosure under other policies or regulations including but not limited to the Freedom of Information Act 2000 and other applicable legislation in any jurisdiction.

VII. ICF Group Internal Transactions. Disclosed data will not separately identify internal transactions between separate legal or operating entities within ICF.

3.4. Quality Assurance

ICF acknowledges its responsibility for quality assurance i.e. the accuracy and completeness, as well as quality, of our data.

Where possible, we will use the DFID-specific Validator tool that IATI is currently developing, to support us in this endeavor, and we will also welcome DFID-based monitoring.

This policy will be reviewed annually and, where necessary, updated.