Aid Transparency Index: technical review proposal

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# Introduction

Publish What You Fund is reviewing the Aid Transparency Index assessment and scoring approach. Our aim is to update the assessment method to adapt to new developments and ensure the Index continues to reflect the areas of aid transparency that are most important for those using the data, particularly stakeholders in the global south.

In keeping with the Index itself, we are running this review process in a transparent and participatory way and have sought input and expertise from the wider aid transparency community.

The review is a three part process. We began with an **internal review** to develop proposals for areas of improvement or adjustment to the Index approach. We then carried out a **stakeholder consultation** process, running both an online data use survey and a series of consultation meetings with technical experts and the organisations assessed in the Index. We used these inputs to further refine and develop our proposal and to assess the feasibility and appropriateness of the proposed changes we had developed internally. From these consultations we have now developed this **proposal for comment** which we are publishing and circulating for input and feedback over the next four weeks. Once the four week period ends, the review process will close. We will then review and incorporate feedback in order to issue a new Aid Transparency Index Technical Paper. This new technical paper will be implemented in the 2022 Aid Transparency Index assessment.

We are grateful to all of those who have participated in this process so far, and appreciate any comments or feedback you may have on the proposals set out in this paper.

# Networked data

An important aspect of international aid delivery is the network of organisations that channel aid money to development and humanitarian projects. This network involves delivery chains. These include vertical links, when aid is dispersed by donors downstream to organisations that then sub-grant to implementing partners, as well as horizontal links – when organisations come together in consortiums and co-funding arrangements. Some organisations assessed in the Aid Transparency Index receive aid funds as well as disburse funds to partners, functioning as intermediate points in vertical chains. Being able to map these networks is an important element of understanding how aid is delivered, which actors are involved and how these relate to one another.

For these reasons we are proposing to add a **Networked data** indicator to the Index. The indicator will assess how publishers are publishing information about other participating organisations in their aid delivery chains. It will assess the quality and standardisation of this information.

There are ways to carry out more specific networking of activities using the IATI Standard. For example, activities can be linked together through transactions. However, use of these features is still incipient, and so we will not be assessing this type of networking in the 2022 Index.

## Proposed indicator

The **Networked data** indicator will assess the publication of information about participating organisations in activities. For IATI data, the indicator will assess the quantity and quality of data published in the [Participating org](https://iatistandard.org/en/iati-standard/203/activity-standard/iati-activities/iati-activity/participating-org/) element of the activity standard. There is already an index indicator that assesses participating organisation data – the **Implementer** indicator – and this will be enhanced and incorporated into the **Networked data** indicator. The new indicator will be part of the **Joining-up development data** component.

Incorporating the **Implementer** indicator, the **Networked data** indicator will be a two-part test. The first part will be the enhanced **Implementer** indicator, testing the extent to which organisations are publishing information about implementing partners in their activity data. The second part of the test will assess the use of organisation references for all participating organisations (Funding, Accountable, Extending and Implementing). We will review whether and how references are being used to refer to participating organisations. This will help to build a common understanding and standard approach to referencing organisations in the IATI data. Providing feedback to publishers assessed in the Index will help them to improve the way they reference other organisations, which can facilitate mapping and networking of data.

**Definitions and tests**

*Part 1: Implementer*

***This test will be enhanced to require the name or reference of the organisation to be included as well as the role.***

**Survey question:**

Does this organisation publish which organisation implements the activity?

**Definition:**

The implementer of the activity is the organisation that is principally responsible for delivering it. The IATI reference for this indicator is: Implementing organisation (participating-org role = implementing).

**Test:**

For each current activity, if `activity-status/@code` is one of (2, 3, 4) then participating-org[@role="4"] should be present with the narrative child element or reference (@ref)

*Part 2: Organisation references*

***This test will check organisation references against the*** [***list of valid prefixes***](https://codelists.codeforiati.org/OrganisationRegistrationAgency/) ***for IATI organisation references, as well as the*** [***IATI publisher list***](https://www.iatiregistry.org/publisher)***. Organisations that use OECD DAC CRS channel codes to refer to organisations should use the XM-DAC- prefix to identify that they are channel codes and distinguish them from other numerical references.***

**Survey question:**

Does this organisation use commonly accepted references for its participating organisations?

**Definition:**

The test will review whether references are used for organisations across the participating organisation roles (Funding, Accountable, Extending and Implementing). References must use a prefix from the [list of valid prefixes](https://codelists.codeforiati.org/OrganisationRegistrationAgency/) for IATI organisation references or be on the [list of IATI publishers](https://iatiregistry.org/publisher) to be accepted. The test will exclude references to the publisher themselves. OECD DAC CRS Channel Codes will need to use the XM-DAC- prefix in order for the codes to be accepted as organisation references. Generic or non-specific organisation references (such as “Developing country-based NGO” or “Multilateral Organisations”) will not be accepted since these do not allow networking of organisations.

Each activity will receive a percentage score based on the number of participating organisations that have references and those that don’t. This will be calculated as follows:

Number of participating organisations using refs / Total number of participating organisations (excluding self-references)

These scores will then be aggregated across an organisation’s activities to calculate the final score for this test.

Organisations working exclusively with partner country governments or private sector investments will be excluded from this test since there is currently no accepted way to refer to these participating organisations.

## Scoring

The **Networked data** indicator will be included in the **Joining-up development data** component. It will be worth **5 points** in total, with points allocated between the two tests as follows:

Implementer: **3.33 points**

Org. references: **1.67 points**

# Conditions indicator

The Conditions indicator has come under review due to a lack of clarity about what should be disclosed in the Conditions element in IATI. The [IATI Standard guidance for this element](https://iatistandard.org/en/guidance/standard-guidance/conditions/) has been updated since the 2020 Index and this provides more clarity about what is required.

There had been some confusion about whether Conditions referred to the conditions placed on an implementing partner or “aid conditionality” placed on a partner government. The new IATI guidance clarifies that either of these applies – conditions can be policy conditions, performance conditions or fiduciary conditions, and these should all be disclosed when attached to an activity.

For IATI data the Conditions indicator is a two-part test, assessing the “Conditions data” element and the “Conditions document” element. For Conditions data, publishers can use a 1 or 0 to indicate whether an activity has conditions, and if a 1 is used, those conditions can be included as raw data in the element. For the Conditions document element, publishers can tag a document with the A04 document code. Publishers can do either of these to pass the test of the indicator. Both of these are subject to manual IATI sampling.

Currently, some publishers use “0” entries in their conditions data across their activities, which is sufficient to pass the automated test but does not provide any information about policy, performance or fiduciary conditions. For any project with an implementing partner, or which works directly with a partner government it is expected that there are conditions, unless it is explicitly stated that funding is unconditional.

## Proposed changes

In order to make the test more relevant we propose to restrict it to aid types:

A01 Budget support

A02 Sector budget support

C01 Project-type interventions

F01 Debt relief

This will exclude activities such as core contributions (to multilaterals, pooled funds or NGOs) and smaller aid types such as scholarships, personnel and administration.

Restricted in this way we can then use the sampling process to pick up on “0” indications that are not substantiated.

## Changes to Index definition

**30. Conditions**

**Survey question:**

Are the terms and conditions attached to the activity published?

**Definition:**

The terms and conditions of the activity may also be referred to as benchmarks, priors, deliverables, or involve words such as “subject to...”. They are specific to an individual activity and explain what the recipient must do in order to be eligible for the funds to be released.

Any policy conditionality related to the activity should be published here. In cases where there are both terms and conditions and policy conditionalities for an activity, all of these should be declared.

The conditions should include loan repayment terms if the activity is financed by a loan.

The IATI references for this indicator are: Conditions and/or Conditions document (document code = A04). For IFIs and DFIs, this includes loan repayment conditions or special terms and conditions. In cases where the loan repayment terms are considered commercially sensitive, this information can be redacted. The reason for the redactions needs to be explicitly stated in detail and must clarify why the information is commercially sensitive and would cause material and direct harm if published.

For private foundations and humanitarian agencies, statements setting out what the grant can be spent on are accepted.

Templates for general terms and conditions are not accepted for scoring this indicator. If there are no policy, performance or fiduciary conditions associated with a relevant activity, this must be explicitly explained. An official document stating this will be accepted in lieu of a conditions document.

# Changes to IATI data quality sampling process

The Aid Transparency Index approach to IATI data quality sampling takes a random sample of activities against each sampled indicator and uses this sample to make inferences about the entire population of an organisation’s data. Each sample is checked and then passed or failed against the indicator criteria. If less than half the samples pass (<50%) then that indicator fails sampling and the IATI points are lost for that indicator. We currently run two rounds of sampling. The first follows an initial data pull, which is not used to calculate the final scores of the index assessment, but rather is used to provide feedback to publishers. This lets people know where their data requires improvements in order to pass the second, final round of sampling. The final sampling round contributes to final Index scores.

***Currently we use a sample size of 20 for both the first and second round of sampling. We propose to change the sample size for the first round of sampling to 12, while maintaining a sample size of 20 for the second round.***

This explanation seeks to demonstrate the significance of pass/fail results in the sampling and to illustrate the levels of confidence and margins of error in these findings.

Note that these calculations are based on an unlimited population size – for limited population sizes the sample sizes required for the same confidence levels are reduced marginally. For populations < 500 the sample sizes start to reduce more significantly.

In studies where the plan is to estimate the proportion of successes in a dichotomous outcome variable (yes/no) in a single population, the formula for determining sample size is:

Where *n* is the sample size, *p* is the proportion of “pass” results, *Z* is the z-score for calculating the confidence interval based on a normal sample distribution and *E* is the margin of error. *p̂* is the sampled proportion of passes. See this [Stack Overflow approach](https://stats.stackexchange.com/questions/11724/minimum-number-of-observations-for-logistic-regression) for reference.

Taking a sample size of 20, with a standard 95% confidence level (a *z-score* of 1.96), corresponds to a margin of error of 22%. Since we don’t know the true value of *p*, for this calculation we can substitute with a marginal value of 0.5 since this is where the margin of error would be highest:

For a sample of 20 an indicator fails sampling if it scores 9/20 (0.45) or less. In these cases we can have 95% confidence that when an indicator fails sampling:

*p* < (0.45 + 0.22)

*p* < 0.67

The consequences of failing sampling are to lose the IATI points for that indicator. This can have a significant impact on the publisher’s overall score. Given this, we are careful to only fail an indicator if we are confident that a significant proportion of a publisher’s data would not meet our criteria. We feel that it is reasonable to fail an indicator if we are confident that a third or more of that publisher’s data would not pass our quality tests. We will keep the sample size of 20 for the second round of sampling since these results are reflected in final Index scores.

First round of sampling

We propose to use a sample size of 12 for the first round of sampling. The purpose of the first round of sampling is to provide an indication of current performance and to let publishers know if there are issues with their data quality which should be fixed in order to improve the chances of passing in the second round of sampling.

A marginal pass with a sample size of 12 would be at 6/12, or 0.5. The margin of error in this case, at the 95% confidence level, would be 28%, so a marginal pass could include 0.5 - 0.28 = 0.22 within the confidence interval. For this reason, we advise publishers when they pass close to the margin since this places them at risk of failing in the second round of sampling. Using the margins of error and confidence intervals we can calculate for which passing scores we should alert publishers that they are at risk of failing in the second round. We would want to alert publishers in cases where it is possible that *p̂* ≥ 0.5 ∩ *p* < 0.5, to the 95% confidence level. Using a sample size of 12, with a result of 0.75, *E*=0.245.

0.75 - 0.245 = 0.505

Since 0.505 > 0.5, we can be 95% confident that when *p̂* ≥ 0.75, *p* > 0.5. So, we would alert publishers when they pass the first round of sampling but *p̂* < 0.75, in other words, when they pass with a result of 6, 7 or 8 out of 12. If the result is 9, 10, 11 or 12 out of 12, we are confident that *p* > 0.5 and the data is of high enough quality to pass in the second round.

## Changes to technical paper

(...)

Manual checks and sampling are conducted twice: first, as part of the initial assessment and second, at the end of data collection. The results of the first round of manual checks and sampling are shared with the donor organisation, giving them the chance to fix any issues.

(…)

For individual projects and operations, 11 indicators are sampled to manually verify that the information provided meets the required criteria and definition against which they are being scored. A first round of sampling is carried out at the start of the data collection process after the first set of data is downloaded. Where indicators failed sampling or passed on the margin, feedback is provided identifying the problems with the data so publishers can fix issues before the final data download. A second round of sampling is carried out at the end of the process. The results of this second round are reflected in the final indicator scores. In the first round of sampling, f~~F~~or each indicator ~~20~~ 12 random samples are selected from the data for review. A minimum of ~~ten~~ six of these samples (the relevant project document or data) need to pass sampling to be scored as IATI data. In the second round, 20 random samples are reviewed and a minimum of 10 must pass in order for that indicator to be scored as IATI data. If less than 20 ~~activities passed the~~ data samples are available for an indicator, then all of the relevant documents or data are reviewed and at least half of these must be approved in order to be scored as IATI data. The sampled indicators are:

* Country strategy or Memorandum of Understanding (MoU)
* Titles
* Descriptions
* Project budget documents
* Sub-national locations
* Conditions
* Project procurement
* Objectives
* Pre-project impact appraisals
* Reviews and evaluations
* Results

For four of these indicators, two sub-elements are verified as part of the sampling process. These are:

* Conditions:
  + Conditions data
  + Conditions document
* Results:
  + Results data
  + Results document
* Sub-national locations:
  + Sub-national location data (coordinates or point)
  + Sub-national location (narrative)
* Project procurement:
  + Contract documents
  + Tenders

# Scoring structure/accessibility criteria

The Index reviews aid data and information made transparent by organisations in a variety of possible formats, including data on an organisation’s website, as a PDF, Excel or CSV file, or IATI data. Given the variable accessibility and usability of these different formats, scores for indicators are graduated, with higher scores given to comprehensive data that is more open and accessible. The highest scores are awarded for data published in the IATI Standard since this is open, machine readable, forward-looking, timely, standardised and centralised in the IATI Registry.

We will continue to award the highest scores for comprehensive datasets published in the IATI Standard, however we propose to make adjustments to the scoring structure to avoid some inaccuracies that can occur under the current system.

Currently, comprehensive datasets published in non-IATI formats can score between 16.67 to 50 points for an indicator. Comprehensive datasets published in the IATI Standard score 100 points. We plan to keep this as it is.

Non-comprehensive, or partial datasets published in non-IATI formats score 0 points under the current system. Points are only awarded for comprehensive publication in other formats – we measure this by taking a random sample of projects and reviewing whether data is available for those projects. For IATI publication, partial datasets receive between 50-100 points, depending on the proportion of activities for which the data is available and on publication frequency.

We identified a problem at the lower end of the IATI scoring scale. Publishing a very small set of data, covering just a few activities would score 50 points. Awarding a higher score for a publication of a small amount of IATI data than for a comprehensive dataset in an Excel or CSV format begins to stray from being an accurate comparator of transparency. Also of concern was the fact that the scoring structure could be used to “game” scores. An organisation could intentionally publish very small amounts of data in an IATI format to score 50 points for that indicator, rather than 0. This would be a concern if it were being done in order to inflate scores in the Index rather than as a genuine commitment to publish more and better transparency data.

In order to solve these problems, we propose to change the scoring structure for IATI published data to range from 33-100 points rather than 50-100 points.

Under this new structure, publishing data in the IATI Standard will still be the only way to achieve a score in the ‘good’ or ‘very good’ categories in the Index. Organisations not publishing IATI data will struggle to score in the ‘fair’ category and will very likely place in the ‘poor’ or ‘very poor’ categories. In most cases scores will be higher when organisations publish data in the IATI Standard compared to publication in other formats. However, publishing very small amounts of IATI data will score less than a comprehensive dataset published in a non-IATI machine readable format. This will dis-incentivise “gaming” and means scores will be more reflective of transparency (when balancing quantity of data with openness and accessibility).

## New technical paper text

All indicators can score a maximum of 100 points. The scoring approach reflects a graduated system whereby the total possible score an organisation can achieve on each indicator is scaled depending on format, accessibility and/or number of years for which the information is made available.

All indicators that are “**graduated on format**” are scored as follows:

* If published as a PDF = 16.67 points
* If published on a static webpage = 33.33 points
* If published in a machine-readable format (CSV, XLSX, etc.) = 50.00 points
* If published in IATI XML = ~~50~~ 33–100 points depending on data quality and frequency.

|  |
| --- |
| **Box 2. What is machine-readable data and why is it scored highly?**  Information published in machine-readable formats is presented in a structured way (not free text) that can be read automatically by a computer. Formats such as XML or spreadsheets (XLSX, CSV) are machine-readable formats. Data in traditional word-processed documents, HTML and PDF files are easily read by humans but can be difficult for machines to interpret, standardise or compare.  Publishing data in a structured, machine-readable open format allows activities of different organisations to be quickly collected and compared. By contrast, comparing non-standardised data across multiple organisations or countries would require searching multiple websites and aggregating information published in different PDF files. This difference is reflected in the Index scoring. Comprehensive data published in the IATI Standard scores highest, followed by data published in other machine-readable formats, then websites and finally PDF files.  Documents are also scored based on accessibility: for example, an annual report published on a website as a PDF would be picked up and scored in the manual survey, however including a link to this report in an organisation’s IATI file makes it easier to locate and identify and so it receives a higher score since it is more accessible. |

For indicators relating to organisation planning (e.g. country strategies, audits, annual reports) that are “**graduated on accessibility**”:

* Information published to the IATI Registry is awarded the full score for the indicator (100 points).
* Information published in all other formats is awarded 50 points out of a possible 100.

These indicators relate to organisation documents, which may be provided in IATI data in the form of links to documents held on an official public website. Critically, they must specify the correct document code from the IATI ‘[Organisation Documents Codelist’](http://reference.iatistandard.org/201/codelists/DocumentCategory/). This makes them easier to locate and identify as they have been categorised according to a common standard; hence they are scored more highly.

For indicators on projects or operations that are “**graduated on accessibility**”:

* Information published to the IATI Registry can score ~~50~~ 33–100 points per indicator based on the quality and frequency of publication
* Information published in all other formats is awarded 50 points for the indicator.

The scoring for the two forward-looking budget indicators at the organisation level is “**graduated on both format and the number of years**” for which information is published.

* Publishing a budget for 2022 counts as one year forward looking, 2023 as two years and 2024 as three years.
* Aggregate budgets are treated the same as a one-year forward-looking budget, i.e. an aggregate budget for 2022–2024 is treated the same as a one-year budget for 2022.

If an organisation publishes a budget for 2022 and then an aggregate budget for 2023–2024, then the budget is considered to be two years forward looking. The scores are graduated as follows (where \* = multiply and / = divide):

* PDF = 16.67 \* y/3 (where y is the number of years, up to a maximum of three, for which forward looking budget information is published)
* Website = 33.33 \* y/3
* Machine-readable = 50.00 \* y/3
* IATI XML = ~~50~~ 33 –100 (depending on data quality and frequency) \* y/3
* Aggregate budgets of between 2–3 years are scored the same as one-year forward budgets.

The scoring of IATI data for two indicators is also “**graduated on the proportion of countries”** in which an organisation is active and for which the required information is provided.

* **Disaggregated budgets**: when published in the IATI Standard, the scoring is based on the proportion of budgets published for countries where an organisation is active – or will be – for the next three years.
* **Country strategy – MoUs:** when published in the IATI Standard, the scoring is based on the proportion of countries where a given organisation is active and for which a country strategy or MoU is provided.

# Pre-project impact appraisals

We had considered broadening the definition of the **Pre-project impact appraisals** indicator to allow more document types to meet the requirements for the indicator. However, following our consultations and upon further reflection we have concluded that the definition does not need to be expanded further. For the 2020 Index we excluded most aid types from the indicator test, meaning it now only runs on project-type interventions. This will remove non-relevant activities from the test. We have made some additional changes to the definition, however. We will now require Development Finance Institutions we assess to publish full appraisal documents for their high-risk projects, rather than summary documents.

**33. Pre-project impact appraisal**

**Survey question**

Is a pre-project impact appraisal published?

**Definition**

Pre-project impact appraisals explain the totality of positive and negative, primary and secondary effects expected to be produced by a development intervention.

Environmental, social and human rights impact assessments ~~as well as impact assessments that explain what objectives the project itself intends to provide~~ are accepted. The IATI reference for this indicator is: Pre and post-project impact appraisal (document code = A01).

IFIs and DFIs tend only to publish impact appraisals if regulations require them to, but given the link they have to the eventual impact and results of the activity, all organisations are scored on this indicator.

For loans or private sector investment, risk assessments and the fiscal objectives detailed in the loan document are accepted. These need to be sufficiently detailed and include any criteria used to assess eligibility for receiving the loan. For DFI projects categorised as high-risk (environmental or social risk category A or equivalent) the full impact appraisal document(s) should be published. A summary of the appraisal will not be sufficient.

Humanitarian Implementation Plans (HIPs) and project plans are accepted for humanitarian agencies.

If an official internal procedure has concluded that a pre-project impact appraisal is not necessary for a particular project or programme, official documentation confirming this will be accepted in lieu of an appraisal document.

# Weightings

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Component | Indicator | Weightings |  |  |
| Organisational planning and commitments | Quality of FOI legislation | 1.875 |  |  |
| Accessibility | 1.875 |  |
| Organisation strategy | 1.875 |  |
| Annual report | 1.875 |  |
| Allocation policy | 1.875 |  |
| Strategy (country/sector)/memorandum of understanding | 1.875 |  |
| Procurement policy | 1.875 |  |
| Audit | 1.875 |  |
|  | **TOTAL** | **15.0** |  |
| Finance and budgets | Total organisation budget | 4.17 |  |  |
| Disaggregated budget | 4.17 |  |  |
| Project budget | 3.33 |  |  |
| Project budget document | 3.33 |  |  |
| Commitments | 3.33 |  |  |
| Disbursements and expenditure | 3.33 |  |  |
| Budget alignment\* | 3.33 |  |  |
|  | **TOTAL** | **25.0** |  |  |
|  | Title | 1 |  |  |
|  | Description | 1 |  |  |
|  | Planned dates | 1 |  |  |
|  | Actual dates | 1 |  |  |
|  | Current status | 1 |  |  |
| Project attributes | Contact details | 1 |  |  |
|  | Sector | 3.5 |  |  |
|  | Sub-national location\* | 3.5 |  |  |
|  | Conditions | 3.5 |  |  |
|  | Unique ID | 3.5 |  |  |
|  | **TOTAL** | **20.0** |  | These have been reduced to accommodate Networked data |
|  | Flow type | 3 |  |
|  | Aid type | 3 |
|  | Finance type | 3 |
| Joining-up development data | Tied aid status | 3 |
|  | Project procurement | 3 |
|  | Networked data | 5 |
|  | **TOTAL** | **20.0** |  |
| Performance | Objectives | 5 |  |  |
| Pre-project impact appraisal | 5 |  |  |
| Reviews and evaluations | 5 |  |  |
| Results \* | 5 |  |  |
|  | **TOTAL** | **20.0** |  |  |
|  | **OVERALL TOTAL** | **100.0** |  |  |

The above table is the proposed new weighting structure for the Index components and indicators. The changes are highlighted in the table.

We conducted an online stakeholder survey that focused on data users, particularly those in the global South, to inform changes in the relative weightings between components and indicators. The results of the survey were largely consistent with our existing scoring approach, and the weightings given by respondents signalling the importance of data in the various components did not deviate significantly with our existing scoring structure. On this basis, we have maintained the structure broadly as it was for the 2020 Index, only making adjustments to incorporate changes to indicators.

We have included the new **Networked data** indicator in the **Joining-up development data** component. Given its importance and the fact that it is a composite indicator, including what used to be the **Implementer** indicator, we have assigned **5 points** to this new indicator.

Since we have taken the **Implementer** indicator from the **Project attributes** component to include it as part of the **Networked data** indicator, we have moved the **Conditions** indicator into the **Project attributes** component. This is an appropriate place for the indicator to be included since it deals with specific details about the activity. We have also increased the points available for **Conditions** transparency from **3.33** to **3.5**, in line with other indicators in the **Project attributes** component.

In order to keep the balance of components consistent with the 2020 Index, we have lowered the points for the other indicators in the **Joining-up development data** component. These were previously **3.33** each, and we have lowered them to **3 points** each. The total points available in the Joining-Up Development Data component is still **20**.

# Annex: Proposals not taken forward

Several of the proposed changes we had initially developed internally, based on the Publish What You Fund team’s experience of running the Aid Transparency Index and the kind of feedback we receive from stakeholders, did not make it into this proposal. These include:

**Update of Accessibility Indicator:**

We had considered changing the accessibility indicator so that it would test whether an organisation’s aid data portal is underpinned by IATI data. The aim of this was to improve accessibility of IATI data and to further encourage use and publication of IATI data amongst reviewed agencies. Feedback on this proposal from our consultation meetings raised questions about the feasibility and desirability of adding such criteria. The principle objection was the preference for IATI data to be accessed through one central portal rather than a set of portals managed by different organisations. While we had included in our design the option of a using a central portal, the proposed changes would have also created incentives for the creation of multiple, decentralised portals which would not necessarily lead to the improved data access outcome we were aiming for.

**Engagement Indicator:**

Our [research and experience](https://www.publishwhatyoufund.org/download/2020-index-report/) has highlighted the importance of using aid data to engage with stakeholders. Engagement is an important way to build trust between actors, and to catalyse the use, usefulness and quality of aid transparency data. Responding to these findings we developed proposals to measure publisher engagement in partner countries. Developing these proposals was challenging as we needed to find quantifiable ways to measure actions and activities carried out by organisations. We settled on proposals to assess engagement policies or links to transparency data in organisation communications such as press releases, newsletters and updates. Following our consultations and testing of the proposed approach we concluded that the indicator would deviate from the general assessment method of the Index, and given the complexities and heterogeneity of external communications, it would not be possible to develop a standard approach at this time.

**Gender/policy marker indicators:**

We proposed introducing an indicator to test use of the gender policy marker, since the use of such markers can aid data users in identifying funding streams relating to particular issues. There were several issues with the proposal which led us to decide not to implement it at this time. There are several policy markers including markers for disability, climate change, aid to environment and participatory development/good governance as well as gender. We did not feel we were able to include one of these and not others without a justification for this. Our research into gender financing has also shown that the way the gender marker is used is not currently consistent across publishers, and carrying out quality control for their correct use would be prohibitively labour intensive.

**Other traceability indicators:**

An additional proposal for the **Networked data** indicator was to measure use of upstream and/or downstream transaction linking between activities, either from funders to implementers or from multilaterals to contributors. We found that uptake of transaction linking is too low among IATI publishers to include such an indicator at this time. Reasons for the low uptake include the complexity of the current process for linking activities, a lack of standardised technical guidance and a lack of consensus in the IATI community about the exact way linking should be done. This has implications for whether the IATI community’s goals of traceability are currently feasible.

**Contact details:**

We looked at adding additional criteria to the **Contact details** indicator that would award higher scores for project or country specific contact details. However, following feedback from our consultations we were not able to substantiate the hypothesis that more specific details would necessarily be better for accountability and responsiveness to data users. A highly responsive centralised help desk could be more effective than a set of decentralised contacts, for example. Since we were not able to establish a normative basis for extra criteria, no changes to the **Contact details** indicator are currently proposed.