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TRANSPARENCY POLICY IMPLEMENTATION GUIDE FOR GRANTEES



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TRANSPARENCY POLICY IMPLEMENTATION GUIDE

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Acknowledgements

The sections of this guide on Open Licensing were adapted for CIFF staff from the Hewlett Foundation's Open Licensing Toolkit for Staff (also licensed under CC BY), with many thanks to our colleagues at Hewlett.

Feedback

This Implementation Guide for CIFF Grantees is a living document. CIFF welcomes your feedback to improve this guide. Please send feedback to your CIFF Liaison, or to info@ciff.org.

TRANSPARENCY POLICY IMPLEMENTATION GUIDE

1 Introduction

1.1. Openness and transparency are important to CIFF's grant-making. We are committed to sharing as much information as possible about what we and our partners are learning. Contributing to the global knowledge bank will help all of us speed up the transformational changes required so that every child survives and thrives, and climate change slows or stops.

1.2. CIFF's Openness & Transparency policy is part of a global effort in the development sector to make more information widely accessible to inform strategies, plan interventions and manage resources effectively.

1.3. The purpose of this guide is to assist CIFF grantees in implementing the Openness & Transparency policy with grantees.

2. What does CIFF's Transparency Policy cover?

2.1. This policy applies to all CIFF grantees and consultants, both implementers or evaluators.

2.2. The policy applies to Work Products created with CIFF funding. Work Products include final versions of presentations, reports, datasets, technical reports, landscaping documents, software, websites, photographs, videos, and similar programme- and evaluation-related deliverables produced by grantees, consultants, and their subcontractors with CIFF funding.

2.3. Exceptions will be assessed on a case-by-

case basis with the CIFF Project or EME Manager. Specifically excluded from the policy are:

- Grantees' administrative reports to CIFF,
- Work Products that contain commercially sensitive information,
- Work Products that arise from programme-related investments, mixed motive investments and conventional investments,
- Political briefings, during the active phase of the grant, and
- Strategy papers, during the active phase of the grant.

2.4. CIFF encourages grantees to work with CIFF Project and EME Managers to decide which of the grantee's contract deliverables should be considered Work Products and should be covered by the Openness & Transparency policy. The Work Products may be specified within a grantee's contract annexes. The grantee's list of Work Products may evolve over the life of the grant.

2.5. CIFF recognises that compliance with this policy may entail additional costs, and we will work with grantees to support these costs.

2.6. In the event that grantee institutions have similar policies, CIFF favours adherence to the policy that permits the widest possible access to Work Products.

2.7. The Openness & Transparency Policy has several inter-related components. Each of these is covered in

detail in the following sections of the Implementation Guide:

- *Open Licensing*. CIFF requires grantees (both implementation and evaluation grantees) to use open licensing, for example Creative Commons (CC) licenses, for Work Products. This is one of several public copyright licenses that enable free distribution of work that would likely otherwise fall under the "All Rights Reserved" copyright default position.¹
- *Open-access publication of academic manuscripts*. Related to open licensing, CIFF requires grantees who write manuscripts for publication in peer reviewed academic journals, as part of their CIFF-funded work or with data collected as part of their CIFF-funded work, to publish these manuscripts as open-access articles only.² Research and findings that were created with CIFF support should not be held behind a paywall, but should be widely accessible and easy to find.
- *Registration of impact evaluations*. Since March 2015, CIFF has required evaluation grantees to register impact evaluations in suitable registries.
- *Data management and sharing plan*. CIFF requires grantees whose work will yield data (for example, evaluation grantees) to develop a data management and sharing plan as part of the organization's proposal for work, and/or as part of their contract with CIFF.³

1. A CC license is used when an author wants to give others the right to share, use, and build upon work that the author has created. A CC license protects those who use or redistribute the author's work from concerns of copyright infringement, so long as they abide by the conditions that are specified in the license by which the author distributes the work. There are several types of CC licenses, with the Creative Commons Attribution ("CC BY") license being the most permissive licensing agreement. It permits users to share (copy and redistribute the material in any medium or format) and to adapt (remix, transform, and build upon the material) for any purpose, even commercially. Users of the material must give appropriate credit to the grantee, provide a link to the license, and indicate if changes were made.

2. An article could be published in a journal which is entirely open-access, such as PLOS Medicine; or an article could be published as an open-access article in a journal which also publishes closed-access articles (articles which are normally available only behind a paywall).

3. Peer organisations including Wellcome require grantees to develop a data management and sharing plan, please see: <http://www.wellcome.ac.uk/About-us/Policy/Spotlight-issues/Data-sharing/Guidance-for-researchers/index.htm>

2.8 Two components of the Openness & Transparency Policy, both related to use of repositories, will go into effect by 30 April 2016. Before April 2016, CIFF encourage grantees to comply voluntarily with these components of the Openness & Transparency policy.

- *Data repository.* CIFF will require grantees to deposit the datasets they create with CIFF funding into a suitable data repository that would make the data available to the public, also under a permissive license or dedicated to the public domain, such as the Creative Commons 0 (zero) license.⁴
- *Repository of reports.* CIFF will require grantees to deposit final versions of reports they create with CIFF funding into a suitable repository so as to increase availability of these reports to the public. The CIFF website will also offer reports for download, and will link to the relevant repository.⁵ Please note, CIFF does not require the types of reports specified in 2.3 above to be deposited in a repository.

3. To whom does the Transparency Policy apply?

3.1. The Openness & Transparency policy applies to new implementation and evaluation grants that are contracted after CIFF adopted the Openness & Transparency policy on 23 October 2015.

3.2. CIFF encourages grantees whose multi-year contracts were signed before the Openness & Transparency policy was adopted to integrate compliance with the Openness & Transparency policy into their workplans during their next annual re-contracting cycle.

3.2.1. For example, Johns Hopkins University Center for Human Nutrition has a multi-year grant from CIFF to evaluate a World Food Programme nutrition program in Malawi. The multi-year grant agreement was signed 23 February 2015, and the Openness & Transparency Policy did not apply during the first programme year (2015). CIFF encourages JHU CHN to plan for compliance with the Openness & Transparency Policy beginning with the second programme year (2016).

3.3. Those grantees whose single- or final-year contracts will end soon after the Openness & Transparency policy was adopted are encouraged to comply voluntarily with relevant aspects of the CIFF Openness & Transparency policy. For example, CIFF encourages grantees to make their final work products widely available under open licensing.

3.3.1. For example, Valid's grant was agreed 15 December 2014 and expires 7 December 2015. Deliverables from the grant include detailed maps of stunting in Bangladesh. Valid will make these maps available with open licenses, and will deposit high-resolution .pdfs of these maps in the XXX repository. The software that Valid modified to create these maps is a commercial interest and will not be made available with open licensing nor deposited in a repository.

4. CIFF Commitment to Open Licensing

4.1. As part of our commitment to openness and transparency, CIFF supports open licensing – an alternative for traditional copyright that allows and encourages sharing of intellectual property. Open licenses, such as those developed by Creative Commons, protect authors' rights while giving explicit permission to others to freely use, distribute, and

build upon their work. Open licensing increases the chances that good ideas will be vetted, that others will be able to use these good ideas, and ultimately that these ideas achieve their greatest possible impact for improving the lives of children living in poverty.

4.2. CIFF endeavors to make information related to our grantmaking available under an open license so that others may learn from our experiences. As of 23 October 2015, when CIFF adopted the Openness & Transparency Policy (set out at Appendix 1), our commitment to open licensing has included materials created with our grant funding, to help ensure that our grantees' work will reach the widest possible audiences. CIFF generally requires grantees to openly license final materials created with grant funding under the current version of the Creative Commons Attribution license.

4.3. CIFF makes its own Work Products available under open licensing, including content on CIFF's website.

4.4. This requirement does not apply to grants made for general operating support of an organization or a program of a nonprofit organization. We believe that such a requirement is incompatible with the nature of general operating support grants, although of course we hope that the positive experience of openly licensing works made with project-based grants will encourage our grantees to apply open licenses to all of their work.

4.5. The Creative Commons Attribution license is the most permissive license offered by Creative Commons. It gives others permission, free of charge and in advance, to acquire and make available works licensed under it, as well as to incorporate them into new ones – to “remix, transform and build upon” the work, in

4. Some examples of repositories are:

- The [UK Data Service](#), also called the [UK Data Archive](#), funded by the ESRC
- The Natural Environment Research Council [Data Centres](#)
- The World Bank [Microdata Library](#)
- [Dryad](#)
- [Figshare](#)

5. One example of a repository is [R4D](#) for DFID-funded work. The Directory of Open Access Repositories ([OpenDOAR](#)) maintained by the University of Nottingham indexes repositories. Fluxx has a ready-made plug-in to the Foundation Center (US), which may be suitable for CIFF's needs.

Creative Commons' phrase – even to sell the work, so long as they credit the original author for his or her contribution.

4.6. In the event that our default open license does not make sense for a particular grant – for example, when the work in question contains sensitive information, or when revenue generated by its sale is critical to an organization's financial well-being – CIFF will work with the grantee to determine the most appropriate licensing. As with all of our efforts related to openness and transparency, we try to approach open licensing with thoughtfulness and care; no grantee should suffer harm because of our commitment to open licensing.

4.7. Open licensing of CIFF's own work and work created with our grant funding gives us a better chance of achieving our greatest possible impact. It allows others to more easily find, use, respond to, and incorporate into their own work ideas that we believe help people to best improve the lives of children living in poverty, and improve efficiency in resourcing this work.

4.8. A table setting out the different types of open licenses is set out at Appendix 2.

5. Open licensing -- frequently asked questions

5.1. *What is an open license?*

An open license permits others to use copyrighted works made with grant funding (such as reports, landscaping documents, slide decks, or videos), not only by viewing them and making copies, but also by incorporating all or parts of them in other works, changing them, and even publishing and selling them – as long as the new user attributes the creator and the work in a reasonable manner. CIFF plans to use the open licenses created by Creative Commons, although other open licenses may also be acceptable. For a summary of the different types of licenses, please see Appendix 2 or for more information on open licensing, please see <http://creativecommons.org/>.

5.2. *What does this mean for my organisation's grant from CIFF?*

Grant agreements for implementation grants will refer to CIFF's Openness & Transparency Policy (which is set out at Appendix 1), which includes an open licensing provision that grantees agree to license Work Products under a Creative Commons Attribution Only (CC BY) license.

Grantees will also be required to make their Work Products publically available, for example by posting them on their website. Grantees will also be required to develop and maintain a data management and sharing plan, which will be kept on Fluxx, CIFF's online project management tool. At the beginning of the grant's lifespan, the data management and sharing plan asks grantees to plan how they will openly license and disseminate the Work Products they created with CIFF funding, for example, through a public website, at a grantee meeting, etc. CIFF and the grantee will review the data management and sharing plan regularly, including during Annual Programme Reviews. Towards the end of the grant lifespan, the data management and sharing plan will report how the grantee has shared Work Products throughout the life of the grant.

5.3. *What is a "Work Product"?*

Work Products are deliverables created by grantees as a result of their grant with CIFF, for example, final versions of presentations, reports, datasets, technical reports, landscaping documents, software, websites, photographs, and videos.

For the avoidance of doubt, grantees' administrative reports to CIFF are specifically excluded from this policy, as are Work Products that contain any commercially sensitive information or that arise from programme related investments, mixed motive investments and conventional investments. CIFF will routinely exclude political briefings and strategy papers during the active phase of our grants.

5.4. *What if an open license does not make sense?*

In consultation with grantees, the CIFF Manager may permit grantees to opt out of open licensing or other elements of the Openness & Transparency Policy on a case-by-case basis. The grantee and the CIFF Manager

will make a note in Fluxx and in the Data Management and Sharing Plan explaining what parts of the Openness and Transparency Policy the grant has been opted out of, for how long, and what the rationale for the opt-out is. The CIFF Executive Team has ultimate authority for deciding on opt-outs.

5.5. *How will grantees be expected to inform CIFF staff about their openly-licensed Work Products?*

Grantees will be asked regularly to describe how they are fulfilling their open licensing obligations, including as part of their reporting requirements at Annual Programme Reviews. Grantees are encouraged to proactively report on their efforts to openly license Work Products by, for example, providing the website where the Work Product can be found.

5.6. *How does CIFF support open-access publication in academic journals?*

CIFF strongly encourages grantees to publish manuscripts in academic journals as one form of dissemination. Through the peer-review process, academic publication can improve the rigour of the analysis and quality and clarity of presentation. Also, academic publication makes findings permanently and widely available, and findable through databases such as PubMed.

CIFF requires that manuscripts based on CIFF-funded work be published with open access. Grantees may submit manuscripts to journals of their choice, CIFF does not require grantees to publish only in open-access journals. CIFF encourages grantees to plan and budget for fees that may be necessary to publish articles with open access.

CIFF encourages grantees to identify the number of publications that grantees expect to develop over the life of the grant, and the estimated date at which these publications will be submitted to journals. CIFF understands that some grantees may find it difficult to publish manuscripts in academic publications during the lifespan of their grant. CIFF will work with current and former grantees to support open-access publication of findings, even if the grant has ended.

6. Grantee reporting on compliance with the Transparency Policy

CIFF encourages its grantees to check in regularly with CIFF Project Managers/EME Managers about grantees' compliance with the Openness & Transparency Policy, including at Annual Programme Reviews (APRs).⁶

In assessing grantee compliance, CIFF Project/EME Managers may ask:

- What Work Products will this grant produce? (for example, final versions of documents, landscaping, slide decks, and datasets that could be informative to someone other than the grantee and CIFF)
- How will these Work Products be made available to the widest possible audience?
- Have these products been published with open licensing?
- What barriers do you the grantees face in making your Work Products widely available?
- How can CIFF help you make the Work Products widely available?

Specifically for evaluation grantees:

- Has the evaluation been registered in a suitable registry?
- Is the grantee's data management and sharing plan up-to-date and ambitious?
- Once datasets are available, have datasets been entered into a suitable registry, with

appropriate meta-data?

- Have manuscripts related to the grantee's work with CIFF been published with open access?

For example, the grantee might describe how its staff made its Work Products available to the public in a readily accessible format. If applicable, the grantee could provide the URL for the location of the Work Product (such as the grantee's public website address or a repository such as www.issuelab.org).

7. Registration of Impact Evaluations

CIFF requires that its evaluators register evaluations in suitable registries.

The benefits of registering evaluations include:

- increasing transparency in research intentions and analysis plans;
- discouraging selective reporting, for example of only positive results or results that achieve statistical significance;
- tracking results of evaluation studies that are based on hypotheses against their original evaluation objectives; while not, however, deterring studies and analyses intended for discovery or with exploratory intent;
- reducing error, by allowing more eyes on data;
- facilitating replication and expansion; and
- permitting publication of findings in journals that require research to be registered.

Some suitable registries are:

- 3ie's Registry for International Development Impact Evaluations ([RIDIE](#))
- Jameel Poverty Action Lab [JPAL](#)
- Berkeley Initiative for Transparency in the Social Sciences ([BITSS](#))
- American Economic Association (AEA) [Randomized Control Trial Registry](#)
- Center for Open Science [Open Science Framework](#)
- US National Institutes of Health [clinicaltrials.gov](#)
- [Qualitative Data Repository](#)
- [The Open Science Framework](#)

Registration of impact evaluations often require pre-analysis plans to be written and uploaded before endline data collection. Evaluation grantees need to plan for this step.

CIFF's peer organisation, the Hewlett Foundation, has required registration of evaluations since May 2014. The grantee is required to provide a link to the registered study in the registration database in its first report.

CIFF expects results of impact evaluation results to be published, in accordance with the analysis plan. On a case-by-case basis and in consultation with grantees, CIFF will consider changes to this approach.

6. For the avoidance of doubt, specifically excluded from the policy are:

- Grantees' administrative reports to CIFF,
- Work Products that contain commercially sensitive information,
- Work Products that arise from programme-related investments, mixed motive investments and conventional investments,
- Political briefings, during the active phase of the grant, and
- Strategy papers, during the active phase of the grant.

7. The American Journal of Clinical Nutrition, for instance, requires "registration in an appropriate public trials registry of all clinical trials and observational studies that began after July 1, 2008. Such registries include ICMJE-approved public trials registries (<http://www.clinicaltrials.gov>, <http://www.anzctr.org.au/>, <http://www.isrctn.org>, <http://www.umin.ac.jp>, <http://www.trialregister.nl>)."

http://ajcn.nutrition.org/site/misc/ifa_register.xhtml

8. Data management and sharing plans

Where grantees generate or collect data (including monitoring data), CIFF requires the grantee to develop a data management and sharing plan and to keep it updated during the life of the grant. The data management and sharing plan should be agreed and signed by relevant parties before any data collection begins. CIFF and the grantee should review and update the data management and sharing plan at least as often as the Annual Programme Review.

The grantee is free to develop a suitable format for the data management and sharing plan in conversation with the CIFF Project/EME Manager, provided the data management and sharing plan contains the information as described below. A data management and sharing plan expressed in a format that is suitable for the UK Data Service (ESRC), the Wellcome Trust, or the US National Science Foundation will generally be fine, and CIFF encourages grantees to consult these organisations' guidance.

In addition to describing how data will be managed, grantees must specify how the data will be made accessible to others. Data management and sharing plans should be agreed at the time of contracting, and developed in concert with relevant partners including collaborating institutions. Data management and sharing plans are particularly important for data that may be useful as a resource for programme planners or the wider research community. Data management and sharing plans should be proportionate to the scale and likely value of datasets that will be generated.

Consent procedures should anticipate data sharing in accordance with the data management and sharing plan. Research participants should be made aware if their anonymised data may be shared. Sharing sensitive data can be cumbersome, grantees should think through data handling procedures carefully. Grantees should consider whether a Public Domain Dedication is appropriate for data that will be generated with the grant.

An example data management and sharing plan is

included in Appendix 4.

8.1. Required content:

- Types of data
- Measures of protection of human subjects
- IRB reviews and approvals
- Standards to be used for data and metadata format and content
- Policies for access and sharing
- Policies and provisions for re-use of data
- Plans for archiving data
- Guidelines for authorship for publications, if relevant
- Expected outputs
- Timelines for sharing and access
- Limitations on sharing, including those to safeguard research participants
- Resources needed to deliver the plan

8.2. Research with Children

CIFF is aware of ongoing discussions⁸ about whether people under the age of 18 are capable of consenting to their own data being shared. We recognize that from a children's rights perspective, and to avoid perpetuation of the so-called "statistical invisibility" of children and young people, a nuanced position is needed. CIFF seeks to strike a balance to ensure that guidance on consent, privacy, and protection principles are appropriately applied.

8.3. Resources

Managing & Sharing Research Data: A Guide to Good Practice. UK Data Service. Available: <http://ukdataservice.ac.uk/manage-data/handbook>.

9. Repositories for non-administrative Reports and Data

*This component of CIFF's Openness & Transparency policy will go into effect by 30 April 2016.

Non-Administrative Reports

CIFF requires its grantees to deposit research reports they create with grant funding into a suitable repository so as to increase the availability of these reports to the public.

Some examples of repositories are:

- [R4D](#) for DfID-funded work
- [Figshare](#)
- [Issue Lab](#), a service of the Foundation Center, used by Hewlett

The Directory of Open Access Repositories ([OpenDOAR](#)), maintained by the University of Nottingham, indexes repositories by country, subject area, content type, repository type, and language of interface.

In the event that a report contains politically sensitive observations, the grantee should consult with its Program or EME Manager to decide how to share the report, and whether appropriate adaptations (e.g., a "sanitized version") should be created and made widely available.

Data

This component of the CIFF Openness & Transparency policy is expected to take effect in April 2016, although CIFF encourages grantees' voluntary compliance before April 2016. Once this component is in effect, CIFF will require grantees to deposit the datasets they create with CIFF funding into a suitable data repository that would make the data available to the public, under a permissive license or dedicated to the public domain, such as the Creative Commons 0 (zero) license or the Open Data Commons Attribution license⁹. Grantees would also need to provide

8. Oxfam's Responsible Data Policy <http://policy-practice.oxfam.org.uk/blog/2015/08/a-rights-based-approach-to-treating-data-responsibly>
9. <http://opendatacommons.org/licenses/>

Grantees would also need to provide metadata, or information about the dataset and its operability.

It is difficult to anonymize data from qualitative research, when participants are purposively selected and sample size is small. CIFF suggests that grantees upload meta-data about qualitative research into data registries, and only upload qualitative data that has been sufficiently anonymized.

Examples of datasets that CIFF grantees create with CIFF funding include:

- Programme monitoring data
- Evaluation data

Some examples of potential repositories are:

- The [UK Data Service](#), also called the [UK Data Archive](#), funded by the ESRC
- The Natural Environment Research Council [Data Centres](#)
- The World Bank [Microdata Library](#)
- [Dryad](#)
- [Dataverse](#), maintained by Harvard University, for sharing, citing and preserving research data.

Datasets which are expected to have absolutely no use to anyone beyond the life of the program may be excluded from deposit in a relevant repository.

Timing

Data should be made available within 24 months of the end of data collection, or at the time of publication of the first article based on the data, whichever comes first. CIFF strongly encourages researchers to make data available as early as possible, to permit others to take advantage of “fresh” data. The grantee should also make available the data and coding for cleaning, and analytical methods used for that publication. CIFF expects that all study data should be made public no later than two years after data collection, unless

special circumstances require longer. The expected timing for release of clean data with appropriate meta-data is to be decided at the time of the grant award, and specified in the data management and sharing plan.

In consultation with the CIFF Liaison, and in accordance with the data management and sharing plan, the timing of release of the data may vary. CIFF recognises that some datasets can be analysed and findings published more quickly than others, for example, a clinical trial can be analysed more quickly than a large cohort study. CIFF also recognises that investigators at different types of institutions are able to publish more or less quickly than colleagues at other institutions.

Meta-data

- CIFF-funded datasets should be shared with appropriate context. Grantees should ensure the integrity of meta-data for CIFF-funded datasets.
- Data should be provided in formats that allow them to be both technically and practically interoperable with other data.¹⁰
- To enable reproducibility of data and analyses, grantees are encouraged to provide statistical software code for data cleaning and analysis along with raw datasets.
- CIFF encourages grantees to conform with data documentation/metadata guidelines, like the Data Documentation Initiative, or to upload data to a repository that has similar guidelines.
- CIFF may require that data be anonymised before applying a Public Domain Dedication to the data.
- CIFF respects our grantees’ Intellectual Property and recognises the value of specialised software and analysis techniques. When CIFF funding has been used to develop unique analysis techniques, including software, the timing for making these analysis techniques or software

widely available should be specified in the grantee’s data management and sharing plan.

Costs

CIFF will support the reasonable costs of grantees’ adherence with the Openness & Transparency policy. Grantees should budget and plan for the costs of making relevant Work Products available in accessible repositories as early as possible in grant planning, and discuss and agree those with the CIFF liaison.

10. CIFF Grantee IDInsight points out that datasets may be technically interoperable, but not necessarily practically interoperable. For example binary formats from proprietary statistical packages may be a problem. Text formats, such as a .csv file, may be more useful.

Appendix 1: CIFF's Transparency Policy

CIFF works with a wide range of partners seeking to transform the lives of poor and vulnerable children in developing countries and to slow down and stop climate change. This involves supporting bold ideas to seemingly intractable challenges for children.

CIFF knows that the returns on smart investments in children's early development are very high. So CIFF aims to play a catalytic role as a funder and influencer to deliver urgent and lasting change at scale.

Openness and transparency have become increasingly important to CIFF's grant-making. CIFF is committed to sharing as much information as possible about what CIFF and its partners are learning. Contributing to the global knowledge bank will help all of us speed up the transformational change required so that every child survives and thrives.

The Policy is part of a global effort in the development sector to make more information widely accessible to inform strategies, plan interventions and manage resources effectively. The Policy supports, and is informed by, the policies of CIFF's organisational peers and international policies, including those policies that guide public funding.¹¹

The Policy applies to CIFF as a whole, including all of its grantees and consultants, and to the deliverables/work products, including data, that they produce with CIFF funding ('Work Products').

Work Products include final versions of presentations, reports, datasets, etc. produced by Grantees, consultants, and their subcontractors. Please note that grantees' administrative reports to CIFF are specifically excluded from the Policy, as are Work Products that contain any commercially sensitive information or that arise from programme related investments, mixed motive investments and conventional investments.

All grant-funded deliverables, work products, and

data will be subject to the default licenses as described below. Exceptions will be assessed on a case-by-case basis with the CIFF Project or EME Manager. In the event that grantee institutions have similar policies, CIFF favours adherence to the Policy that permits the widest possible access to Work Products.

CIFF recognises that complying with this Policy may entail additional costs, and it will work with grantees to support these costs.

In some instances, CIFF and the grantee or consultant may agree to opt out of certain aspects of the Policy. If so CIFF will aim to be open and transparent about the reasons why the Policy is not being adhered to. CIFF will routinely exclude political briefings and strategy papers during the active phase of its grants. In consultation with its grantees, CIFF staff will regularly review grantees' compliance with the Policy.

Open licensing

CIFF attempts, where possible, to make CIFF-owned, -controlled, or -created content available via open licensing, such as a Creative Commons license.

CIFF requires its grantees and consultants to widely disseminate Work Products funded by the grants and/or funding they receive from CIFF and to which they hold the copyright.

In particular, CIFF requires its grantees and consultants to license such products to the public under a Creative Commons Attribution 4.0 International license.

Furthermore, CIFF expects all grantees/consultants to understand that CIFF may distribute or make available any copyrightable materials to third parties subject to the Creative Commons Attribution 4.0 International license.¹²

CIFF also expects its grantees and consultants to let us know how they have fulfilled CIFF's requirements

to openly license and disseminate the Work Products of the grant and/or funding they received from CIFF. For example, the grantee might post a report or presentation on the grantee's website with a statement that it is licensed to the public subject to the Creative Commons Attribution 4.0 International license.

Where intellectual property (IP) is developed using CIFF funding, CIFF will work with grantees/consultants to ensure that, if appropriate, it is distributed and made available to third parties subject to the Creative Commons Attribution 4.0 International license.

Grant Funded Research & Data

CIFF believes that providing access to research plans and research data permits healthy scrutiny of evidence, reduces duplication of effort, and enables secondary uses of data, which improves efficiency of resourcing.

CIFF requires grantees to create and maintain a data management and sharing plan, in collaboration with CIFF and any relevant sub-grantees, before any data collection begins.

CIFF requires impact evaluations to be registered in suitable registries early in the evaluation lifecycle.

CIFF expects that all data created using grant funds should be released into the public domain¹³, along with appropriate metadata, at a time agreed with CIFF and in accordance with the grantee's data management and sharing plan.¹⁴

CIFF also expects the grantees to ensure that the data is easy to locate. While it may be posted on an institutional or personal website, grantees should ensure that it is also deposited in a free and open repository or repository appropriate to the discipline.

Any data should be formatted so as to be technically and practically interoperable with other data, to the

11. These international policies include Article 27 of the UN Universal Declaration of Human Rights (1949), the OECD Paris Declaration on Aid Effectiveness (2005), the OECD Declaration on Access to Research Data from Public Funding (2007), IATI Standards, and the Global Philanthropy Data Charter.

12. Or a more recent version of the Creative Commons Attribution license. For information on this license, please visit <http://creativecommons.org/licenses/by/4.0/>.

13. Data should be released into the public domain using the CCo Public Domain Dedication, Open Data Commons Attribution license, or a similar license.

14. Creative Commons 0 Public Domain license is described here: <https://creativecommons.org/publicdomain/zero/1.0/>; Open Data Commons Attribution License (ODC-BY) is described here: <http://opendatacommons.org/licenses/by/1-0/>

extent possible. If the data requires specific tools for access, use and analysis, those tools should also be made available under a free and open license.

CIFF recognises the critical importance of ethical conduct with regard to data sharing and of protecting confidentiality, particularly of vulnerable people, and recognises the importance of ethical interpretation of data. CIFF seeks to comply with applicable data protection laws and standards, and requests that grantees and consultants also comply.





CIFF and its grantees will build provisions for data sharing into consent procedures before research studies begin, anonymise or redact data where research participants could be identified, and control access to sensitive data.

For more information about the implementation of the Policy, including timings and costs, please refer to the CIFF Transparency Policy Implementation Guide, or contact CIFF staff.

The Policy will be kept under review.

Appendix 2: Creative Commons license types

(<https://creativecommons.org/licenses/>)

CC license	Description	When to use	Examples
	<p>Attribution CC BY</p> <p>This license lets others distribute, remix, tweak, and build upon your work, even commercially, as long as they credit you for the original creation. This is the most accommodating of licenses offered. Recommended for maximum dissemination and use of licensed materials.</p>	<p>For maximum dissemination and use of a work product.</p> <p><i>CIFF's preferred license.</i></p>	<p>Reports, research findings, memos</p>
	<p>Attribution-NonCommercial CC BY-NC</p> <p>This license lets others remix, tweak, and build upon your work non-commercially, and although their new works must also acknowledge you and be non-commercial, they don't have to license their derivative works on the same terms.</p>	<p>When the author needs to retain the ability to sell/commercialise the work product.</p>	<p>Creative works to produce income</p>
	<p>Attribution-NonCommercial-NoDerivs CC BY-NC-ND</p> <p>This license allows for redistribution, commercial and non-commercial, as long as it is passed along unchanged and in whole, with credit to you.</p>	<p>When particular domain expertise is required or when the subject matter of a work product is sensitive or has political implications.</p>	<p>Government-related materials; technical datasets</p>
	<p>Attribution-ShareAlike CC BY-SA</p> <p>This license lets others remix, tweak, and build upon your work even for commercial purposes, as long as they credit you and license their new creations under the identical terms. This license is often compared to "copyleft" free and open source software licenses. All new works based on yours will carry the same license, so any derivatives will also allow commercial use. This is the license used by Wikipedia, and is recommended for materials that would benefit from incorporating content from Wikipedia and similarly licensed projects.</p>	<p>For maximum dissemination and use of a work product.</p> <p><i>CIFF's preferred license.</i></p>	<p>For maximum dissemination and use of a work product.</p> <p><i>CIFF's preferred license.</i></p>

Note: Please contact your CIFF liaison if you would like to discuss alternative license types. Other options include Attribution-NonCommercial-NoDerivatives (CC BY-NC-ND) and Attribution-NonCommercial-ShareAlike (CC BY-NC-SA).

Marking open licensed documents

Content type	Where to place CC license information	What to include (requirements)
Online text/webpage	Webpage footer	<p><i>Minimum requirement:</i> The name and full URL (hyperlink) to the applicable license; a copyright notice stating the author(s), date and copyright.</p> <p>This work is licensed under CC-BY version 4.0 https://creativecommons.org/licenses/by/4.0/ ©2015, [Name of Author(s)]. Some Rights Reserved.</p> <p>If your content incorporates third party works, specify which elements are not CC licensed, and include proper attribution for all third party works.</p> <p><i>Optional:</i> a CC license icon that includes the CC logo linked to the appropriate CC license deed. Best practice is to use the CC license chooser to generate a machine-readable CC license.</p>
Online image or audio	Immediately below or next to the content. Recite at the beginning or end of the original audio file/broadcast audio reciting the type of CC license used	
Online video or presentation	Immediate below or next to the content and include a copyright screen/page	
Link to document, image, video, or other content	Immediate below or next to the link	
Collection of documents for a download (example: a zip file)	Immediately below or next to the download link and include a text file with the CC license in the download; where appropriate, place CC mark in content. Include a text file called LICENSE.txt in the zip file that identifies	
Offline text/document	Cover page or include a copyright page	
Offline image	Immediately below or near the image, if included in another work. In a separate text file if distributed standalone (or create a zip file, see above)	
Offline video	Title screen or include a copyright screen	
Offline presentation	Title page or include a copyright page	
Offline audio	Recite at the beginning or end of the original audio file/broadcast audio reciting the type of CC license used.	

Tips

- For online content, use the Creative Commons license chooser which can be found at <http://creativecommons.org/choose/>

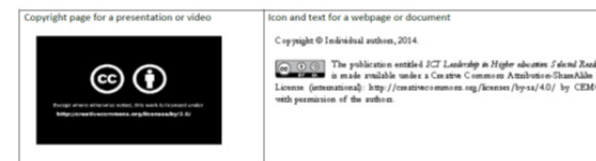
- Copy and paste the HTML code into your webpage or website

- Benefits: The code: makes it easier for others to provide you proper attribution; increases the chance your work will be found in online searches; and provides editable text

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- If you are marking work that contains content already licensed under a Creative Commons license, follow the example below:

- The photo X is © 2009 Jane Park, used under a Creative Commons Attribution-Noncommercial license: <https://creativecommons.org/licenses/by-nc/4.0/>.



Appendix 3: Example data management & sharing plan *To be added – examples from John Hopkins and/or icddr,b

Wellcome Trust guidance:

<http://www.wellcome.ac.uk/About-us/Policy/Spotlight-issues/Data-sharing/Guidance-for-researchers/index.htm>

UK Data Service guidance:

<https://www.ukdataservice.ac.uk/manage-data/plan/planning>

US National Science Foundation guidance:

<http://www.nsf.gov/bfa/dias/policy/dmp.jsp>