

07 December 2011

Dear Cobus de Swardt,

We are writing to you as members of the Independent Review Panel of the INGO Accountability Charter, in order to give you feedback on the Report which you submitted in time for the reporting deadline in September 2011.

We would like first of all to thank you for your participation in this exercise and to recognise the commitment to accountability that this demonstrates.

Our approach to assessing the reports which we have received has been to focus on three dimensions in particular:

- How **complete** is the report in relation to the guidelines used?
- How strong is the **evidence** given for the self-assessment that each organisation has conducted?
- What evidence is there of **institutional commitment** to greater accountability and to using the reporting process to advance it?

On **completeness**, we want to recognise the demanding nature of many of GRI's requirements. Many organisations find it difficult to respond to some of the more detailed requests for information. We attach a note by the Secretariat that goes through the shortfalls against the reporting template in detail. While you may find this of value, we should like to emphasise that we do not consider that, at least at this stage of the exercise, it is essential to meet every element of the template – which we recognise may in some cases be overly demanding, particularly for smaller institutions. We have however noted below areas where we felt that your organisation might wish to invest more attention in your next report.

On **evidence**, we looked in particular for references not only to relevant policy documents, but also to examples where the self-assessment was supported by specific action (for example, drawn from operational activities, whether successful or unsuccessful).

On **institutional commitment**, we looked for evidence of top-level ownership of the report (for example an opening statement signed by the Chief Executive); of using the report as a means of identifying areas of relative strengths and weaknesses in the organisation (as opposed to a box-ticking exercise); and of a systematic concern with accountability, including recognition of areas for further work. We would hope that progress in such areas would be high-lighted in future reports.

Please note that as a Panel we feel that part of our role is to encourage improved reporting. To that end we are enclosing for your information some examples of what seemed to us Good Practice in responding to some individual indicators, based on the GRI framework. This document consists of examples from all reports reviewed in 2011.

Organisation-specific feedback to Transparency International

We believe that your report is good, especially considering that this is your first report using the GRI framework. The report is **complete** and comprehensive. You present good **evidence** by providing reference with the possibility to find more details. We appreciate that you recognise your weaknesses and commit to improvement, for example with regards to monitoring/evaluation, your complaints mechanism and environmental reporting. Furthermore we appreciate the overview of your governance structure and that you present the salary range. We also see signs of **institutional commitment** to accountability. Given that your area of work is transparency, we would however have welcomed an even stronger recognition on how important this is for you as an organisation in the opening statement.

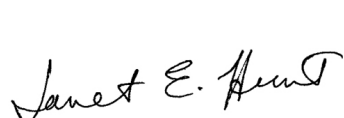
We see your answers on the following components as **Good Practice** for other organisations (see "Good practice on GRI Reporting II" attached to this letter):

- "NGO7 Resource allocation."
- "4.1 Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight": We appreciate the visualisation of the governance structure.
- Declaration of salary ranges.

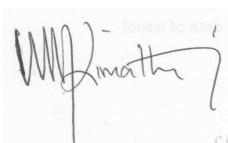
Our intention is that this letter, and any response that you may wish to provide, should be made publicly available on the Charter website, along with your organisation's report. You can find the reports that were reviewed in the beginning of this year on the Charter website under the section Charter Members/Member Reports. However, should there be errors of fact in the feedback above or in the more detailed Secretariat note below on conformity with the reporting framework, we would of course wish to correct these before publication.

Should you have any comments we would appreciate a response *by 16 January 2012*.

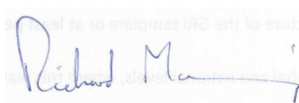
Yours sincerely,



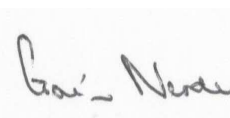
Janet Hunt



Wambui Kimathi



Richard Manning



Gavin Neath

Note on accountability report, reviewed in October 2011

Organisation: Transparency International
Reporting period: Calendar year 2010

Reporting framework used

- ☒ GRI Reporting Framework
☐ Interim Reporting Framework

On the GRI Reporting Framework

What GRI reporting level did the organisation report on?

- ☐ A
☐ B
☒ C

Did the Secretariat contact the organisation for further information before forwarding the report to the panel?

- ☐ Yes
☒ No

Comment: -

COMMENTS ON THE INFORMATION PROVIDED IN THE REPORT

Profile (recommended 28)

Number of Profile components the organisation reports on in total: **28**

Number of the recommended Profile components the organisation reports on: **28**

Number of additional Profile components the organisation reports on: **none**

Number of Profile components commented on: **4**

“1.1: Strategy and Analysis/ Statement from the most senior decision-maker of the organisation about the relevance of sustainability to the organisation and its strategy.”

Comment: The report does not include information on trends/ key events/ achievements/ failures; or on views of performance with regards to goals/ objectives / standards/ targets.

“2.8: Organizational Profile/ Scale of the reporting organisation including: Number of members and/or supporters, Number of volunteers, Total income.”

Comment: The report does not include information on the organisation’s scope/ scale of activities.

“4.2: Governance, Commitments, and Engagement/ Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organization's management and the reasons for this arrangement). Describe the division of responsibility between the highest governance body and the management and/or executives.”

Comment: The report does not include information on the division of power/ responsibility between the highest governance body and the management.

“4.4: Governance, Commitments and Engagement/ Mechanisms for internal stakeholders (e.g., members), shareholders and employees to provide recommendations or direction to the highest governance body.”

Comment: The report does not include information on how the organisation informs/ consults its employees about the working relationships with formal representation bodies; or on topics raised through the mechanisms in place.

Indicators (recommended 18)

Number of indicators the organisation reports on in total: **18**

Number of the 18 recommended indicators the organisation reports on: **18**

Number of additional indicators the organisation reports on: **none**

Number of indicators commented on: **12**

“NGO1: Processes for involvement of affected stakeholder groups in the design, implementation, monitoring and evaluation of policies and programs.”

Comment: The report does not include information on how the feedback from stakeholders affected the decisions and decision making processes or reshaped policies/ procedures.

“NGO2: Mechanisms for feedback and complaints in relation to programs and policies and for determining actions to take in response to breaches of policies.”

Comment: The report does not include information on mechanisms for assessing complaints; or on mechanisms in place for determining what actions are required in response to feedback and complaints.

“NGO3: System for program monitoring, evaluation and learning, (including measuring program effectiveness and impact) resulting changes to programs, and how they are communicated.”

Comment: The report does not include information on how results from monitoring and evaluation contribute to internal learning; on adjustments to policy and programs as a result of monitoring and evaluation; on how the organisation internally and externally communicated adjustments. The organisations states that it is in the process of developing a revised MEL system, which will be implemented in 2012.

“NGO4: Measures to integrate gender and diversity into programme design, implementation, and the monitoring, evaluation, and learning cycle.”

Comment: The report does not include information on the organisation’s policies/ norms/ standards/ tools for analysis/ actions taken with regards to other types of diversity than gender.

“NGO6: Processes to take into account and coordinate with the activities of other actors.”

Comment: The report does not include information on processes to promote learning from the work of others.

“EC7: Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.”

Comment: The report does not include information on the proposition of senior management in significant locations of operation from the local community

“EN16: Total direct and indirect greenhouse gas emissions by weight.”

Comment: The report does not indicate standards used for calculating the data; and does not identify direct vs. indirect emissions.

“EN18: Initiatives to reduce greenhouse gas emissions and reductions achieved.”

Comment: The report does not state gas emission reductions achieved as a result of the initiatives taken.

“LA1: Total workforce, including volunteers, by type, contract, and region.”

Comment: The report does not include information on volunteers by frequency/ function/ type.

“LA10: Average hours of training per year per employee by employee category.”

Comment: The report does not include information on the total hours devoted to training for volunteers per year.

“LA13: Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.”

Comment: The organisation states that it does not collect data on the age of Board members.

“PR6: Programs for adherence to laws, standards, and voluntary codes related to ethical fundraising and marketing communications, including advertising, promotion, and sponsorship.”

Comment: The report does not include information on the frequency with which the organisation reviews its compliance with its standards; or on the number of complaints of breaches of standards for fundraising and marketing communications practices in relation to stakeholders or in relation to donors.