Dear Cobus de Swardt,

On 15th November 2012 we, as the Independent Review Panel, met to discuss the reports submitted by the reporting deadline of 1st October 2012, and we are now writing to you to give you feedback on your report. First of all we would like 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: What evidence is there of **institutional commitment** to greater accountability and to using the reporting process to advance it? 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? Please find more information on our approach in the annex.

Since we first started assessing the reports we have noticed a **marked improvement in quality** and an improved commitment to accountability. In this round we have reviewed some reports of very good quality. However we have highlighted some common **areas for improvement.** These tend to be in the section on Programme Effectiveness, in particular the indicators related to having a complaints handling mechanism in place (indicator NGO2) and diversity and ethnicity (indicator NGO4). The indicators on training in anti-corruption policies (indicator SO3) and on financial information (indicator NGO8) are also areas for improvement.

- With regard to the **complaints handling mechanism** (indicator NGO2), we would like to remind Members that it is now a mandatory requirement for Charter Members to have such a mechanism in place. This is at the core of good accountability. Such a mechanism should be for external and internal complaints, outline a clear process, including a timeframe for resolution, and be easily accessible. Members should communicate their membership on their website, by uploading the Charter logo, and inserting a link to the Charter text alongside their complaint handling mechanism. The "UN protect, respect, remedy framework" highlights good effectiveness criteria for complaints handling mechanisms (paragraph 31 "Effectiveness criteria for non-judicial grievance mechanisms": http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf).

- Regarding **diversity and ethnicity** (indicator NGO4), we would like to encourage Members to use the guidelines "Make Development Inclusive – How to include the perspectives of persons with disabilities in the project cycle management" developed by CBM available here: http://www.make-development-inclusive.org/toolsen/pcm2.pdf

- With regard to the generally weak reporting on **anti-corruption policies** (indicator SO3), we would like to encourage Members to use the Anti-Bribery Checklist and Anti-Bribery Principles and Guidance for NGOs produced by Transparency International available under the following web-links: http://www.transparency.org.uk/attachments/046_NGO_Anti-bribery_Principles_and_Guidance.pdf and http://www.transparency-se.org/TI-ABC-20-point-anti-bribery-checklist.pdf In case of specific queries you may also contact Stan Cutzach at Transparency International at scutzach@transparency.org

- We feel that the **financial information** (indicator NGO8) could be better presented in order to allow for greater transparency. Members are encouraged to look at the Good Practice document to see how others present this information.

- In many reports Members just noted that they have the relevant policies in place but we feel that **more examples** of the policies in practice would be useful. Only when it is supported by evidence does the policy come to life and its usefulness can then be assessed. Members are encouraged to give selective examples where relevant, and to give evidence from evaluations where available.

- We value **succinctness and accessibility**. In some reports access to relevant information is made difficult by a lot of immaterial information being given at the same time. Please try and include only essential information.

We understand that it is a challenge for global organisations to report on many national entities, and would encourage them to provide in their report an explanation as to how their **global accountability standards** are upheld at a national level and, if they are not, how they tackle this issue.

We welcome it when organisations make commitments for the future and identify areas for improvement. As an example, we would like to congratulate Oxfam GB for the table included at the beginning of their report showing their **accountability objectives** and the progress made so far. Individual development plans will help push organisational development towards improved accountability in a more systematic way.

To ensure a greater link between the **Charter commitments** and GRI reporting (focussing on transparency) we would like to emphasise our support for the Charter Board decision that all future reports should have a clear link between the Charter principles and the reported actions. We would like to praise Sightsavers for doing so in their first report.

Please note that as a Panel we feel that part of our role is to encourage organisational improvement. To that end we are enclosing, for your information, some examples of what we believe to be **Good Practice** in responding to some individual indicators, based on the GRI framework. This document consists of examples from all reports reviewed thus far. We would like to encourage you to look at this document as we feel this will be a good learning exercise for all Members to learn from each other.

Organisation-specific feedback to Transparency International

The report is good, **comprehensive** and improved from the previous round. It is positive that the organisation took into consideration some of the feedback from the previous round. With regards to **evidence**, more examples and information on challenges would strengthen the report. There are good signs of **institutional commitment** and commitment for future actions. The information provided regarding gender and other types of diversity is good. We would like to acknowledge the awards you won, congratulate you for these, and encourage you to provide more information in future reports. We look forward to reading more about your Monitoring, Evaluation and Learning framework in your next report. We see room for improvement with regards to your work with the community (indicator SO1) and we encourage you to report more on this. In order to ensure that global accountability commitments are reflected at national level, we would suggest that compliance with Charter Principles is included in your national chapters' reaccreditations.

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

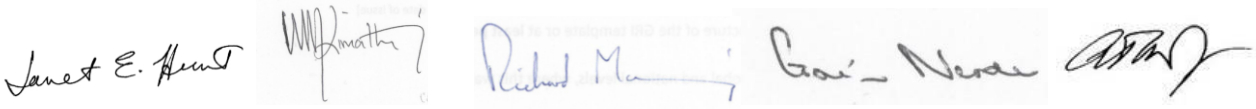
- ***LA12****: Percentage of employees receiving regular performance and career development reviews*
  A clear and comprehensive answer is given.

- ***Declaration of salary ranges***
  It is positive that your organisation publishes its salary range on its website.

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 previously reviewed 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 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 15 January 2013.

Yours sincerely,



Janet Hunt Wambui Kimathi Richard Manning Gavin Neath Tony Tujan

Annex 1 – The Independent Review Panel's approach to assessing reports

On **completeness**, we acknowledge the demanding nature of many GRI requirements and recognise that not all of them are as material as others. In particular for smaller organisations, some requirements may be overly demanding. Nevertheless they give good guidance and we have attached a note that goes through the shortfalls against the reporting template in detail. In addition we have highlighted areas where we felt, in particular, that your organisation could improve as well as other areas which we considered as strengths in your 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). It is important for us to see that the accountability commitments that you made when signing the Charter, lead to informed corrective action and ultimately improve the quality of your work.

On **institutional commitment**, we looked for evidence of top-level ownership of the report (for example in the opening statement signed by the Chief Executive) backed by examples in the report; evidence 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 evidence of a systematic concern with accountability, including recognition of areas for further work. We encourage organisations to highlight the corrective actions they take, and appreciate when they are open about their failures and make clear commitments for the future. We would hope that progress in such areas would be highlighted in future reports.

2nd Review Round 2012
Note on Accountability Report

Organisation: Transparency International
Reporting period: Calendar year 2011

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: The Secretariat contacted TI asking for an explanation as to why the component 4.2 was not included in their report and the correct link to Financial statements provided under indicator NGO 7. TI submitted a revised report with the component 4.2 and a correct link.

COMMENTS ON THE INFORMATION PROVIDED IN THE REPORT

Profile Disclosures (recommended 28)
Number of Profile Disclosures the organisation reports on in total: 28
Number of the recommended Profile Disclosures the organisation reports on: 28
Number of additional Profile Disclosures the organisation reports on: 0

Profile	Comments
Strategy and Analysis	
1.1*	*Comments from previous report: The report does not include information on trends/ key events/ achievements/ failures; or on views of performance with regards to goals/ objectives / standards/ targets.* Comments from this report: Fully addressed The report includes a link to the executive summary of the 2011 Implementation Report where views on performance are available.
Organisational Profile	
2.1*	Fully addressed
2.2*	Fully addressed
2.3*	Fully addressed
2.4*	Fully addressed
2.5*	Fully addressed
2.6*	Fully addressed
2.7*	Fully addressed
2.8*	*Comments from previous report: The report does not include information on the organisation's scope/ scale of activities.* Comments from this report: Partially addressed The report refers to indicator NGO7 for the organisation's scope/ scale of activities; however the information provided is limited.
2.9*	Fully addressed

2.10*	Fully addressed
Report Parameters	
3.1*	Fully addressed
3.2*	Fully addressed
3.3*	Fully addressed
3.4*	Fully addressed
3.5*	Partially addressed The report does not include information on prioritizing topics within the report. The information on the target audience for this report is provided under component 2.7
3.6*	Fully addressed The report only covers the International Secretariat, and not the National Chapters or the Liaison Office to the European Union.
3.7*	Fully addressed
3.8*	Fully addressed
3.10*	Fully addressed
3.11*	Fully addressed
3.12*	Not applicable
Governance, Commitments, and Engagement	
4.1*	Partially addressed The report does not include information on the committees under the highest governance body.
4.2*	*Comments from previous report: The report does not include information on the division of power/ responsibility between the highest governance body and the management.* Comments from this report: Partially addressed The report includes information on the division of power/responsibility between the Membership Meeting and the Board, but not with the Management.
4.3*	Fully addressed
4.4*	*Comments from previous report: 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.* Comments from this report: Partially addressed More information is provided in this report than in the previous one; however examples of topics raised would strengthen this section.
4.14*	Fully addressed
4.15*	Fully addressed The commitment to the Charter principles should be part of the accreditation process of national chapters to ensure global accountability commitments are also appealed at national level.

*: Recommended Profile Disclosures

Performance Indicators (recommended 18)

Number of performance indicators the organisation reports on in total: 18
Number of the 18 recommended performance indicators the organisation reports on: 18
Number of additional performance indicators the organisation reports on: 0

Indicators	Comments
Program Effectiveness	
NGO1*	*Comments from previous report: The report does not include information on how the feedback from stakeholders affected the decisions and decision making processes or reshaped policies/ procedures.* Comments from this report: Fully addressed The organisation states that its new Monitoring, Evaluation and Learning (MEL) Matrix will ensure that National Chapters are involved more systematically and explicitly in the design, implementation, monitoring and evaluation of all TIS policies and programmes.
NGO2*	*Comments from previous report: 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.* Comments from this report: Partially addressed No additional information is provided in this report. However the organisation states that a mechanism for affected stakeholders to lodge complaints and feedback is envisaged to form part of the MEL Framework which is under development.
NGO3*	*Comments from previous report: 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.* Comments from this report: Partially addressed No additional information is provided in this report. However the organisation states that it is still in the process of developing a more comprehensive MEL system that will consolidate learning.
NGO4*	*Comments from previous report: 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.* Comments from this report: Partially addressed No additional information on types of diversity other than gender is provided in this report.
NGO5*	Partially addressed The report includes clear information on the process for arriving at advocacy positions. A Rapid Response Unit was introduced in 2012. However it does not provide information on the process for corrective adjustments, examples of correctives actions, where advocacy positions are published or the process for exiting campaigns.
NGO6*	*Comments from previous report: The report does not include information on processes to promote learning from the work of others.* Comments from this report: Partially addressed No additional information is provided in this report. This section would benefit from more information on the organisation's general and strategic overview of actors.

Economic	
NGO7*	Fully addressed
NGO8*	Fully addressed
EC7*	*Comments from previous report: The report does not include information on the proportion of senior management in significant locations of operation from the local community* Comments from this report: Fully addressed
Environmental	
EN16*	*Comments from previous report: The report does not indicate standards used for calculating the data; and does not identify direct vs. indirect emissions.* Comments from this report: Fully addressed The organisation states that the data for office heating was not communicated by the property management company in time for this report.
EN18*	*Comments from previous report: The report does not state gas emission reductions achieved as a result of the initiatives taken.* Comments from this report: Partially addressed No additional information is provided in this report; it does not state gas emission reductions achieved as a result of reduction initiatives.
Labour	
LA1*	*Comments from previous report: The report does not include information on volunteers by frequency/ function/ type.* Comments from this report: Partially addressed No additional information is provided in this report; it does not include information on volunteers by frequency/ function/ type.
LA10*	*Comment: The report does not include information on the total hours devoted to training for volunteers per year.* Comments from this report: Partially addressed No additional information is provided in this report; it does not include information on volunteers.
LA12*	Fully addressed **Good Practice:** A clear and comprehensive answer is given
LA13*	*Comments from previous report: The organisation states that it does not collect data on the age of Board members.* Comments from this report: Fully addressed The organisation indicates the country of origin as an indicator of diversity.
Society	
SO1*	Not applicable The programme work with communities is undertaken by National Chapters. However the International Secretariat could be more aware of its responsibility regarding the work done with victims and witnesses of corruption.
SO3*	Partially addressed The report includes information on two training courses organised with staff on the organisation's code of conduct, but does not state the percentage of employees' trained. The organisation states that it is in the process of working to further its own anti-corruption capability to be operational in 2013.

Product Responsibility	
PR6*	*<u>Comments from previous report:</u> 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.* <u>Comments from this report</u>: Partially addressed More information is provided in this report; however there is no indication as to the frequency with which the organisation reviews its compliance with its standards. The information provided under this section would be improved if a link to the donations policy were provided.

*: Recommended performance indicators

Other Good Practice

- **Declaration of salary ranges**: It is positive that the organisation published its salary range on its website.

Organisation's commitments for the future

- **1.1**: "Beyond the challenge of a meaningful impact measurement framework, making substantial progress in enhancing our diversity and decreasing our environmental impact are areas where we also want to make clear progress in the next two years."
- **NGO1**: "The (new) MEL Matrix will ensure that National Chapters as our key stakeholders are involved more systematically and explicitly in the design, implementation, monitoring and evaluation of all TIS policies and programmes."
- **NGO2**: "...a mechanism for affected stakeholders to lodge complaints and feedback is envisaged to form part of the MEL Framework which is currently under development, and expected to be operational in 2012."
- **NGO3**: "...over the next year TI-S will be taking its MEL commitments further by developing a more comprehensive MEL system which, over time, will seek to include greater parts of the Movement." "The system will cover externally focused work". "It will also cover Secretariat support to the capacity of the Movement."
- **NGO4**: "In 2012 Gender mainstreaming at TI-S will be clearly affected within the purview of the newly establishes MEL function."
- **NGO6**: "These relationships are kept track of in an internal database, part of which is planned to be published on our new website, upon its launch toward the end of this year."
- **SO3**: "We are working to further our own anti-Corruption capability in light of these (anti-corruption guidelines for NGOs produced by TI-UK with BOND), to be operational in 2013."