

Interim Reporting Framework

INGO Accountability Charter

REVISED 05 September 2009

The Founding Signatories of the INGO Accountability Charter have entered into a process of creating reporting standards under which all signatories of the Accountability Charter will report on their compliance with the Charter. Developed in the framework of and in close cooperation with the Global Reporting Initiative these standards will be available in the course of the year 2009.

Until then all signatories of the Accountability Charter are being asked to provide their reports in this Interim Reporting Framework.

This Framework has been compiled following “grosso modo” the structure of the INGO Accountability Charter. It includes reporting items and text from the following sources:

- INGO Accountability Charter
- GRI, DRAFT G3 Integrated with NPOSS v1, 19 May 2008
- InterAction, 2008 Self-Certification Plus, Compliance Form

This Framework serves as a basis for a self-certification process in which each signatory provides information on whether over the last 12 months they have fulfilled the Charter criteria or not.

- When answering questions, the organisation should specify whether they are reporting for the secretariat/global headquarters or the federation/confederation/network and/or both.
- In cases where an organisation has fulfilled a criterion (ticked “yes” under “**Compliance**”) they should collect respective evidence and be in a position to provide this evidence upon request.
- In cases where an organisation has NOT FULFILLED or PARTIALLY FULFILLED a criterion (ticked “no/not fully” under “**Compliance**”) they should explain under “Action Plan if not in Compliance” how they will make sure that they fulfil the criteria as soon as possible and in any case until the next report is due.
- Some provisions may not be applicable to certain organisations. In this case the organisation should tick “Not applicable” and briefly explain under “Action Plan if not in Compliance” why the criteria is not applicable in their case.

For signatories that have adopted the Charter prior to June 2007, the reporting date is 30 November 2009.

For those that have adopted the Charter after June 2007, the reports are due 15 months after the date of adoption.

By the respective deadline all signatories are being asked to provide CIVICUS with a filled in Interim Reporting Framework signed by both their Chair and CEO. The address the Framework should be sent to:

Singobile Dube
CIVICUS World Alliance for Citizen Participation
PO box 933 Southdale
2135 Johannesburg
South Africa

For any requests or additional information:

Please DO NOT SEND additional material providing evidence for your statements. Nevertheless you should have complete evidence prepared in case the Board of the INGO Accountability Charter or other interested parties (e.g. donors, journalists etc.) ask for it.

In case reporting organisations have any questions and concerns they may get in touch with Singobile Dube at CIVICUS.

Email: singobile.dube@civicus.org

Phone: +27 11 8335959

For the Board of the INGO Accountability Charter

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Date and signature

1. Profile of the Organisation

Name of the organisation	Transparency International Deutschland e.V.
Name and title of Board Chair	Prof. Dr. Edda Müller
Name and title of CEO	Dr. Christian Humborg
Vision	Effektive und nachhaltige Bekämpfung und Eindämmung der Korruption
Mission	Ziel ist es, das öffentliche Bewusstsein über die schädlichen Folgen der Korruption zu schärfen und nationale und internationale Integritätssysteme zu stärken. (http://www.transparency.de/UEber-uns.44.0.html)
Values	Transparency Deutschlands Grundprinzipien sind Integrität, Verantwortlichkeit, Transparenz und Partizipation der Zivilgesellschaft. (http://www.transparency.de/UEber-uns.44.0.html)
Primary brands	Nutzung der Instrumente unserer Mutterorganisation Transparency International e.V. (Global Corruption Report, Bribe Payers´ Index, Global Corruption Barometer, Corruption Perception Index Eigene Instrumente und Veröffentlichungen wie: Checkliste für “Self-Audits” zur Korruptionsbekämpfung in Unternehmen, Checkliste für “Self-Audits” zur Korruptionsbekämpfung in Kommunen, ABC der Korruptionsbekämpfung, Tagung Strafverfolgung der Korruption
Major programmes	Übergreifendes Schwerpunktthemen: „Korruptionsbekämpfung in kleinen und mittelständischen Unternehmen“ und „Ratifizierung der UN-Konvention gegen Korruption durch Deutschland“ Schwerpunkte entsprechend unserer Arbeitsgruppen
Core activities	Die Arbeit unseres Vereins zielt hauptsächlich auf strukturelle Veränderungen ab. Zur Stärkung der Korruptionsprävention analysieren wir mögliche Risikofelder und setzen uns für Veränderung rechtlicher und politischer Rahmenbedingungen ein. Wir entwickeln Instrumente, die

	Unternehmen und Organisationen bei der Korruptionsprävention helfen. Unverzichtbar ist unsere Aufklärungs- und Überzeugungsarbeit im Kleinen.
Ownership and legal form	Eingetragener Verein, Amtsgericht Berlin-Charlottenburg
Operational structure <i>Including roles and responsibilities of global and national entities</i>	Mitgliederversammlung Vorstand (ehrenamtlich, bestehend aus 12 Personen) Regional- und Arbeitsgruppen (ehrenamtlich) Geschäftsstelle (mit Koordinationsfunktion für die Ehrenamtlichen)
Location and address of global headquarters/ secretariat	Transparency International Deutschland e.V., Alte-Schönhauserstr. 44, 10119 Berlin
Number of countries where the organisation operates <i>Please attach list of all countries where you operate</i>	Wir operieren nur in Deutschland.
Number of employees	4 Vollzeitbeschäftigte plus zwei Praktikanten/innen

Finance (in Euro)	2007	2008	2009
Income from			
- Individual donations	94.551	106.929	106.309
- Foundations	500	500	500
- Governments	0	0	0
- International Organisations <i>UN, EU, World Bank etc.</i>	0	0	0
- Business	86.063	112.700	127.300
- Others – <i>honoraria, publications, fines imposed by criminal courts</i>	50.346	40.146	255.606
TOTAL INCOME	231.460	260.277	489.715
Total income by country - for countries/regions that make up 5 percent or more of total income <i>Please list countries and provide total income for each one</i>	n.a.	n.a.	n.a.
Expenditure for	See National Chapter Financial Overview attached		
- Programmes and activities directly addressing the organisation's purpose			
- Fundraising			
- Administration			
- Others - <i>please specify</i>			
TOTAL EXPENDITURE	237.804	238.850	267.942
Total expenditure by country - for countries/regions that make up 5 percent or more of total expenditure <i>Please list countries and provide total expenditure for each one</i>	n.a.	n.a.	n.a.
Reserves	154.493	172.663	394.286

Significant changes during the reporting period regarding size, structure, or ownership of both liquid and property reserves including <ul style="list-style-type: none"> - <i>the location of operations, including opening of new offices, starting new major activities, and closings</i> - <i>legal status or ownership</i> - <i>global structure and governance</i> 	Wir haben im Jahr 2009 ein Bußgeld in Höhe von 200.000 Euro zugewiesen bekommen. Diese Summe ist für uns erheblich.
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2. Compliance with the principles of the INGO Accountability Charter

Respect for Universal Declaration of Human Rights

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
1	Vision, mission, values and key documents position the organisation's work in the context of Universal Declaration of Human Rights	The organisation's statutes and key programmatic documents.	<input type="radio"/> Yes	
2	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has been working in line with Universal Declaration of Human Rights and that it has resolved any formal written complaints (<i>formal written complaints:</i>	<input type="radio"/> Yes	

		<p><i>either in email or letter through mail or in person with contactable complainant's correspondence. All formal complaints to be acknowledged within 1 month of receipt and complaints resolved within 6 months of receipt</i>) it may have received concerning its alleged breach of these Principles.</p> <p>The Organisation has a Board authorised system to deal with complaints.</p>		
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Independence

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
3	<ul style="list-style-type: none"> - Organisation receives less than 50% from one single source; - Organisation is not owned/controlled by government, political party or business 	<p>Documentation on</p> <ul style="list-style-type: none"> - ownership and - income 	<ul style="list-style-type: none"> o Yes 	

Responsible Advocacy

	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
4	The organisation has written policies ensuring	The organisation's written advocacy	<ul style="list-style-type: none"> o Yes 	

	<p>that its public policy positions and advocacy are</p> <ul style="list-style-type: none"> - in line with its mission and strategy - accurate and - conform with applicable national law 	<p>policies</p> <ul style="list-style-type: none"> - describe the criteria or circumstances in which it will involve itself; - define the process for adopting and implementing its positions, involving partners, experts and other parties as appropriate; - contain due diligence provisions and sign off procedures ensuring legal compliance and avoiding unfair or irresponsible public criticism and undue harm to third parties. 		
5	<p>The organisation's practice fully complies with its policies.</p>	<p>The organisation confirms for the reporting period that it has not been in breach of its own advocacy policies and that it has resolved any formal written complaint it may have received concerning its alleged breach of these policies.</p> <p>The Organisation has a Board authorised system to deal with complaints.</p>	<ul style="list-style-type: none"> o Yes 	

Effective Programmes

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
6	The organisation's programmes are conducted in genuine partnership with local communities.	The organisation's written programme strategy, evaluations of terminated and ongoing programmes and other relevant documents provide evidence that the organisation's programmes strengthen self-reliance, self-help and popular participation by empowering individuals and communities and building capacities of local structures.	<ul style="list-style-type: none"> ○ Yes 	
7	The organisation's programmes aim for sustainable development.	<p>The organisation's written programme strategy, evaluations of terminated and ongoing programmes and other relevant documents provide evidence that the organisation's programmes</p> <ul style="list-style-type: none"> - are based on the potential of local resources to sustain the activity - contribute to further strengthening sustainability at local level and - do not create or increase dependence on external support. 	<ul style="list-style-type: none"> ○ Not applicable 	
8	The organisation's programmes are appropriate for the local needs and conditions.	<p>The organisation's written programme strategy, evaluations of terminated and ongoing programmes and other relevant documents provide evidence that the organisation's programmes</p> <ul style="list-style-type: none"> - take relevant local conditions into account, e.g. by involving local stakeholders in all stages of programme design and implementation - take appropriate care of relevant 	<ul style="list-style-type: none"> ○ Not applicable 	

		<p>local gender, diversity, cultural and religious issues;</p> <ul style="list-style-type: none"> - avoid negative environmental impact and, where possible, secure a positive impact. 		
9	Funds raised for specific programmes reach the people or cause in whose name they were raised.	The organisation's fundraising and donor information materials, donor communication, programme reports and relevant finance statements provide evidence that funds raised for a specific cause have been used to further that cause.	<ul style="list-style-type: none"> ○ Not applicable 	
10	The organisation's practice fully complies with its policies.	<p>The organisation confirms for the reporting period that it has not been in breach of its own programme policies and that it has resolved any formal written complaints it may have received concerning its alleged breach of these policies.</p> <p>The Organisation has a Board authorised system to deal with complaints.</p>	<ul style="list-style-type: none"> ○ Yes 	

Non-Discrimination

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
11	The organisation promotes diversity, gender equity and balance, impartiality and non-	<ul style="list-style-type: none"> - The organisation's written non-discrimination policy affirming its commitment to gender equity, to non-discrimination for sexual 	<ul style="list-style-type: none"> ○ Yes 	

	discrimination in all activities, both internal and external.	<p>orientation, to ethnic and racial diversity, to the inclusion of people with disabilities at staff and board levels;</p> <ul style="list-style-type: none"> - The organization's plans and operations which fully reflect the non-discrimination policy; - The organisation's most recent personnel orientations, trainings and instructional material addressing non-discrimination. 		
12	The organisation's practice fully complies with its policies.	<p>The organisation confirms for the reporting period that it has no knowledge of cases where it may have been in breach of its own non-discrimination policy and that it has resolved any formal written complaints it may have received concerning its alleged breach of these policies. The Organisation has a Board authorised system to deal with complaints.</p>	<ul style="list-style-type: none"> o Yes 	

Transparency

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
13	The organisation is open, transparent and honest about its structures, mission, policies and activities.	<ul style="list-style-type: none"> - The organisation's reports which adhere to generally accepted standards of technical accuracy and honesty in presenting and interpreting data and research; 	<ul style="list-style-type: none"> o Yes 	

		<ul style="list-style-type: none"> - The organisation complies with relevant governance, financial accounting and reporting requirements in the countries where it is based and operates. 		
14	The organisation reports publicly at least once a year about its activities and achievements.	<p>The organisation's annual report which contains:</p> <ul style="list-style-type: none"> - Mission and values; - Objectives and outcomes achieved in programme and advocacy; - Environmental impact; - Human rights impact; - Governance structure and processes, and main office bearers; - Main sources of funding from corporations, foundations, governments, and individuals; - Financial performance; - Compliance with the INGO Accountability Charter and - Contact details. 	<input type="radio"/> Yes	
15	The organisation's annual financial report will conform to relevant laws and practices and be audited by a qualified independent public accountant whose statement will accompany the report.	Independently audited annual accounts	<input type="radio"/> Yes	
16	The organisation's practice fully complies with	The organisation confirms for the reporting period that it has no	<input type="radio"/> Yes	

	its policies.	knowledge of any complaints concerning the accuracy or relevance of its reporting and that it has resolved any formal written complaints it may have received concerning its alleged breach of its reporting provisions. The Organisation has a Board authorised system to deal with complaints.		
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Good Governance

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
17	The organisation has a governing body which has responsibility for the oversight of all aspects of the organisation.	<p>The organisation's bylaws, terms of reference for the governing body, and relevant policies and procedures allocate ultimate authority to the organisation's governing body.</p> <p>These documents also state that the governing body</p> <ul style="list-style-type: none"> - selects, supervises and evaluates the chief executive, - oversees programme and budgetary matters - defines the overall strategy, consistent with the organisational mission, - verifies that resources are used efficiently and appropriately, - ensures that performance is 	<ul style="list-style-type: none"> o Yes 	

		<p>measured,</p> <ul style="list-style-type: none"> - secures financial integrity and - makes sure that public trust is maintained. <p>Documentation on the activities of the governing body shows that all the above tasks have been undertaken thoroughly and successfully.</p>		
18	<p>The work of the organisation's governing body takes place in a clearly defined framework of rules and procedures covering the appointment, responsibilities and terms of members of the governing body.</p>	<p>The organisation's bylaws, terms of reference for the governing body, and relevant policies and procedures</p> <ul style="list-style-type: none"> - identify required qualifications and expertise of the members of the governing body and the mix of skills across the group - specify the frequency of meetings of the governing body, - specify adequate attendance by directors (at least a majority of <i>directors</i> on average), and - lay down voting requirements - provide a process for evaluating the governance body's own performance. <p>Records of the meetings provide evidence that meetings were held and which decisions were taken.</p> <p>A regular general meeting takes place with authority to appoint and replace members of the governing</p>	<ul style="list-style-type: none"> o Yes 	

		body.		
19	The organisation tries to prevent and, if they occur, actively manages conflicts of interest.	<p>The organisation's bylaws, terms of reference for the governing body, and relevant policies and procedures require that members of the governing body and employees:</p> <ul style="list-style-type: none"> - disclose any affiliation they have with an actual or potential supplier of goods and services, recipient of grant funds, or organisation with competing or conflicting objectives; - absent themselves from discussion and abstain from voting or otherwise participating in a decision on any issue in which there is a conflict of interest; and - refuse large or otherwise inappropriate gifts for personal use. 	<ul style="list-style-type: none"> o Yes 	
20	The organisation's practice fully complies with its policies.	<p>The organisation confirms for the reporting period that it has no knowledge of any irregularities in its governance system and that it has resolved any formal written complaints it may have received concerning its governance system or members of its governing body.</p> <p>The Organisation has a Board authorised system to deal with complaints.</p>	<ul style="list-style-type: none"> o Yes 	

Ethical Fundraising

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
21	In accepting funds the organisation ensures that it complies with its own ethical standards.	The organisation's written policy for accepting or refusing certain donations and subsidies clearly states which sources of funding are not acceptable to the organisation for ethical reasons.	<input type="radio"/> Yes	
22	The organisation respects the rights and wishes of donors.	<p>The organisation's written policy confirms donors' rights</p> <ul style="list-style-type: none"> - to be informed about causes for which the organisation is fundraising; - to be informed about how their donation is being used; - to have their names deleted from mailing lists; - to be informed of the status and authority of fundraisers and - to anonymity except in cases where the size of their donation is such that it might be relevant to the organisation's independence and - that donations accepted for a specific purpose, are used for that purpose. <p>The organisation's fundraising and donor information materials and donor</p>	<input type="radio"/> Yes	

		communication are complying with donors' rights.		
23	In raising funds, the organisation accurately describes its activities and needs. It uses donations in line with the information and assurances given to the donor.	<p>The organisation's fundraising materials and communication</p> <ul style="list-style-type: none"> - show how the donation will further the organisation's mission; - neither minimise nor overstate the size or urgency of the challenge the organisation wants to address; - do not contain any material omissions or exaggerations of facts, misleading photographs, nor create a false impression or misunderstanding; - show how organisation will handle any shortfall or excess of income raised for a specific project. <p>The organisation's donor information materials and communication provide detailed documentation on the use of donations.</p> <p>Follow-up with donors about clarity and quality of materials sent to them shows that the organisation's intended message is accurately getting through.</p>	<ul style="list-style-type: none"> o Yes 	
24	The organisation records and publishes details of all major institutional gifts and gifts-in-kind clearly describing the valuation and auditing methods	<p>The organisation's written gifts-in-kind policy</p> <ul style="list-style-type: none"> - states under which conditions and for which purposes gifts-in-kind are being accepted; - provides clear parameters for 	<ul style="list-style-type: none"> o Yes 	

	used.	valuation and auditing of gifts-in-kind. The organisation's documentation of all major institutional gifts and gifts-in-kind is complete and up-to-date.		
25	The organisation ensures that donations sought indirectly, such as through third parties, are solicited and received in full conformity with its own practices.	The organisation's policy for the use of agents or other third parties for fundraising purposes states - that contracts between the organisation and a third party will be in writing and - that these contracts will oblige the third party to comply fully with the organisation's fundraising policy and ethical standards.	○ Not applicable	
26	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has no knowledge of any significant breaches of its fundraising and related policies and that it has resolved any formal written complaints it may have received concerning its own or its agents' fundraising materials and practice. The Organisation has a Board authorised system to deal with complaints.	○ Yes	

Professional Management

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
27	The organisation's management is professional and effective and the organisation's policies and procedures seek to promote excellence in all respects.	<p>The organisation's written management terms and conditions, policies and procedures contain</p> <ul style="list-style-type: none"> - job specifications and personnel profiles for the CEO and Senior Management Team positions - annual work plans for the CEO and the Senior Management Team directly referring to the organisation's strategy - an appraisal system with the CEO being appraised by the governing body. <p>The organisation's strategy and key policies lay down clear objectives and criteria defining excellence.</p>	<ul style="list-style-type: none"> o Yes 	
28	Financial management and control ensure that all funds are effectively used and minimise the risk of funds being misused.	<p>The organisation operates according to a budget approved by its governing body.</p> <p>The organisation exercises adequate internal controls over disbursements to avoid unauthorised payments, prohibiting any un-auditable transactions or loans to members of its governing body or staff.</p> <p>The organisation's annual, audited financial statements</p> <ul style="list-style-type: none"> - are produced by a certified public 	<ul style="list-style-type: none"> o Yes 	

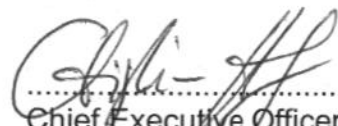
		<p>accountant;</p> <ul style="list-style-type: none"> - presented timely (normally not later than 6 months after the end of the financial year) and in line with the organisation's written finance policy; - comply with nationally accepted accounting standards and legal requirements. 		
29	The organisation has evaluation procedures for its governing body, staff, programmes and projects and conducts monitoring and evaluation on the basis of mutual accountability.	<p>The organisation incorporates appropriate monitoring and evaluation practices in all relevant policies and systems establishing mutual accountability as part of its culture.</p> <p>The organisation conducts regular and deliberate evaluative activities to examine progress towards its goals and mission; and applies in its budget and work plans adequate financial and human resources for monitoring and evaluation.</p>	<ul style="list-style-type: none"> o Partially fulfilled 	Board evaluation and organizational evaluation in progress
30	The organisation ensures that its partners meet the highest standards of probity and accountability.	<p>In its policies guiding the selection of and cooperation with partners the organisation</p> <ul style="list-style-type: none"> - identifies adequate criteria for the selection of effective, legitimate and reliable partners; - takes adequate provisions to exclude links with organisations or individuals involved in illegal or unethical practice. 	<ul style="list-style-type: none"> o Yes 	

31	The organisation recognises the crucial role the quality and dedication of its staff play in the success of its work and is committed to investing in human resource development.	<p>The organisation's written human resources policies and procedures</p> <ul style="list-style-type: none"> - conform fully with relevant international and national labour regulations; - provide for remuneration and benefits levels which strike a balance between public expectations of not-for-profit organisations and the need to attract and retain the staff the organisation needs to fulfil its mission; - apply the best voluntary sector practices in terms of employee and volunteer rights and health and safety at work. - include procedures for evaluating the performance of all staff on a regular basis. 	<input type="radio"/> Yes	
32	The organisation takes all required provisions to exclude corruption and bribery from its work.	<p>The organisation's relevant policies</p> <ul style="list-style-type: none"> - specifically prohibit acts of bribery or corruption by staff or other persons working for, or on behalf of, the organisation; - identify appropriate steps to be undertaken in cases of suspected bribery or corruption. 	<input type="radio"/> Yes	

	sexual exploitation and discrimination.	<ul style="list-style-type: none"> - preventing discrimination in all its forms; - fostering ethnic and racial diversity. - 		
34	The organisation provides internal feed-back mechanisms making sure that the organisation consistently stays within its ethical and legal framework and follows its mission.	The organisation's written whistle-blowing policy enables and encourages staff to draw management's attention to activities that may not comply with the law or the organisation's mission and commitments, including the provisions of the INGO Accountability Charter.	○ Fully	
35	The organisation's practice fully complies with its policies.	<p>The organisation confirms for the reporting period that it has no knowledge of any significant breaches of its management policies or related policies and procedures and that it has resolved any formal written complaints it may have received concerning its management provisions and practice.</p> <p>The Organisation has a Board authorised system to deal with complaints.</p>	○ Fully	

Date 30.6.2010


Chair of the Board


Chief Executive Officer