Feedback from the Independent Review Panel
Review Round March 2016

14 April 2016

Dear Cobus de Swardt,

Many thanks for submitting your INGO Accountability Charter report. In times of conflict and climate change, when civil society organisations (CSOs) have an increasingly important role to play, the space for civil society is shrinking in many parts of the world. Strong accountability and the demonstration that we "walk our talk" have never been more important. It is also against this background that the Charter has initiated an alliance with seven national CSO accountability frameworks to strengthen our collective voice as we devise a shared Global Standard for CSO Accountability.

Before providing you with an individual assessment of your report, there were some issues that arose in all or many reports that the Independent Review Panel wants to share with you:

Getting fit for the digital age

Digitisation allows for unprecedented connectivity. At a time when citizens have increased levels of agency and literacy this is a game changer in the way CSOs work. Mobilisation and relationship building with large numbers of people to *co-create* the change they want to see is at the heart of most new CSO strategies – particularly in campaigning. Working *with*, not *for* stakeholders, is not just seen as the right thing to do, but also as the most impactful.

Important in this evolution is moving ICSOs from transparency to actively sharing information, from consultation to joint decision making and from taking responsibility for others to sharing mutually defined responsibilities.

The Charter has initiated the *Digital Accountability* project and Amnesty International, Greenpeace, Oxfam, Transparency International and others are already intensively involved in this project. We look forward to more cooperation with and among Member organisations on this particular issue and for these issues to be addressed more in future reports.

Globalisation / National level accountability

Decentralisation processes usually place more responsibility and capacity at the national level. To ensure an ICSO presents a unified, coherent voice and can protect its brand, a strong and globally shared understanding of mutual accountability is key. Thus, decentralisation often goes hand in hand with a stronger mandate for the ICSOs' global accountability mechanisms. These should help national entities build capacity in the accountability practice, and also demand stronger delivery on global commitments. Charter Members are encouraged to ensure that all their entities adhere at least to the following minimum standards: transparency, effective and independent oversight, involving people we serve, coordination with partners, sound financial management and impact focus.

Inclusion and diversity

Many Charter Members still focus mainly on gender when demonstrating their accountability in terms of diversity. This is a lost opportunity. As we all know, there is also discrimination on the basis of disability, age, ethnicity, etc. Actively reaching out to these constituencies will strengthen their rights and their participation. For example, positive action can increase the employment of those with disabilities or from minority ethnic groups. Such inclusion is central

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to a human rights based approach, but may also improve results by tapping into a wider base of experience. For further advice, click here on the outcome of a Charter webinar on inclusion or here to look at some good practice examples of Charter Members.

Please ensure that all points listed above are taken into consideration when further developing your accountability practices in the coming months and collecting data for the next INGO Accountability Charter report.

Organisation-specific feedback to Transparency International

Transparency International Secretariat's (TI-S') eighth accountability report is again very good, overall accessible, providing web links and illustrative examples. Previous Panel feedback has been followed up and this report demonstrates great progress in comparison to former years. TI-S' newly developed and highly participatory Movement-wide impact monitoring approach (NGO3) is seen as **Good Practice** for other CSOs.

Strongly-embedded **institutional commitment** to take accountability serious in all work, as part of the organisation's mission, is provided in the CEO's opening statement. Growing engagement, impact, and visibility in 2014 required even more professionalism and accountability. A new and more holistic approach to monitoring impact has been developed in 2014 which supports improving the organisation's accountability and learning. It is appreciated that TI-S has a sub-page on governance reporting which also lists membership of the INGO Accountability Charter and publishes recent accountability reports and the Charter logo prominently (here), supporting Charter commitments to communicating accountability by Members. Moreover, it is positively noted that TI-S provides many links to mentioned policies and procedures throughout the report.

This report is intended to drive continuous improvement with regard to good accountability practice and to support TI-S endeavour to continuously learn and improve. It is appreciated that TI-S self-critically reflects previous Panel feedback and follows up on various improvements (e.g. Whistleblower Protection Policy or impact monitoring approach). In addition, the completed **Improvement Analysis** submitted with this report, clearly shows progress already made and promises for the future.
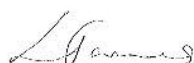
While more illustrative **evidence** is given this year (e.g. mainstreaming of projects supporting victims and witnesses into approaches that are central to the work of TI Chapters and informing global advocacy), this could still be improved in regard to showing that described procedures and policies have actually been effective and led to positive management response (e.g. new Gender and Diversity or Whistleblower Policy). Furthermore, TI-S is asked to clarify how it ensures that its commitments become more relevant at National Chapter level. Other **weaknesses** include that greenhouse gas emissions increased by one third in 2014 (without a reasonable explanation given) and an overarching policy is still missing (EN16, EN18). These issues are summarised in the Panel's Improvement Analysis shared along with this feedback letter.

Overall, Transparency International is commended for a very high level of transparency and accountability to its main stakeholders – the main target audience / *direct beneficiaries* being TI National Chapters; *ultimate beneficiaries* being all people affected by corruption globally. Now that the organisation has progressed regarding their feedback and complaints handling mechanism, the Panel suggests **reporting fully every two years against the Charter commitments from now on**. In a very brief interim report for the year 2015, the Panel would only like to see an updated CEO statement, any crucial changes in comparison to 2014, and information on progress highlighted by the Panel in this year's Improvement Analysis.

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Our intention is that this letter, and any response you may wish to provide, is made publicly available on the Charter website along with your report. You can find the reports that were previously reviewed on our website. However, should there be errors of fact in the feedback above or in the note below; we would of course wish to correct these before publication. Please share these comments or amendments by 15 May 2016.

If you have any other feedback or comments on our work, please share them with us by sending them to the Charter Secretariat.

Yours sincerely,
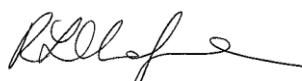
Louise James   ·   Michael Röskau   ·   Jane Kiragu

Rhonda Chapman   ·   John Clark   ·   Saroeun Soeung

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Transparency International

Review Round March 2016
Cover Note on Accountability Report 2014

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	***Statement from the most senior decision-maker*** *Fully addressed* The report's opening statement by the CEO Cobus de Swardt provides a strong commitment to accountability connected with TI-S' cause and their own way of working. Growing engagement, impact, and visibility in 2014 also required even more professionalism and accountability. In this regard, it is positively noted that TI-S strives to generate evidence that enables better informed decision-making as well as increased accountability of the organisation. It is again appreciated that accountability is featured in the 2015 Strategy and that the according publicly available 2015 Implementation Plan provides a framework against which the Secretariat can be held accountable by the Movement and external stakeholders. The Panel hopes that the 2020 Strategy will drive further progress in this area. Finally, the Panel supports TI-S' self-reflection that there is room for improvement in the following areas: Finalising an Environmental Policy, updating the Movement-wide ethics structure and complaint mechanisms, as well as to better mainstreaming this report and the Panel feedback across the Movement.
II. Organisational Profile	
2.1 – 2.6	***Name of organisation / Primary activities / Operational structure including national offices / Headquarter location / Number of countries / Nature of ownership*** *Fully addressed*
2.7	***Target audiences*** *Fully addressed* Following up on last year's Panel feedback, TI-S recognises the pervasive and truly global nature of corruption. Moreover, the organisation clarifies and categorises its target audience: While the main target audience / *direct beneficiaries* remain to be the TI National Chapters, *ultimate beneficiaries* are all people affected by corruption globally. TI-S has also clearly have addressed how new TI National Chapters are identified, the criteria they must meet and how they support partners to become future TI National Chapters.
2.8	***Scale of organisation*** *Fully addressed* This answer provides succinct, relevant and comprehensive data. As a follow-up of previous Panel feedback, more content information on the scope and

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	scale of TI-S' activities is provided via links.
2.9	**Significant changes** *Fully addressed* Jose Ugaz (Peru) and Elena Panfilova (Russia) were elected as new Chair and Vice-Chair of TI-S.
2.10	**Awards received** *Fully addressed* The Panel particularly commends TI-S for receiving an award recognising TI's efforts in effective and honest communication for global advocacy.

III. Report Parameters	
3.1 – 3.4	**Reporting period / Date of most recent report / Reporting Cycle / Contact person** *Fully addressed*
3.5	**Reporting process** *Fully addressed* The target audience (and affected stakeholders) for this report includes TI-S' sponsors, partners, donors and supporters, and those governments, institutions and organisations TI-S works with or seeks to influence or involve in ending corruption worldwide. How does this target audience benefit from the report's publication? It is acknowledged that the reporting process, led by the Governance Director, received input from different departments (Finance, HR, ME+L) and that the report is annually discussed with the Board Audit Committee. TI-S plans to draw expertise from the latter to advise a better targeting of this report's focus in the future, demonstrating TI-S' commitment to continuous improvement for accountability. They recognise that the potential benefit of this reporting remains untapped internally and externally and describe the need to support meaningful internal reflection across teams in order to maximise learning from recent efforts to mainstream data collection and reporting. They anticipate making good progress on this during 2016. The Panel appreciates this realistic update and looks forward to progress in the 2016 report, including how this process has improved learning and accountability. With reference to improving the external benefits of this reporting, the example of Educo's executive summary of their 2014 report offers a more user-friendly report, which may be of interest.
3.6 – 3.7	**Report boundary / Specific limitations** *Fully addressed* The report focuses on the structure, governance, finances, and activities of the International Secretariat (TI-S) only since Charter membership only applies to them. However, at times, illustrative and helpful examples/activities from National Chapters are included. Despite the clarifications provided by TI-S regarding the parameters for reporting to the Charter (see 4.15), it remains challenging to get a clear sense of how TI-S ensures the accountability of Chapters and or partners at the national level. How many National Chapters do not carry the TI brand and

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		why?
3.8		***Basis for reporting*** *Addressed* The organisation refers to 4.15 for a description of the accountability of TI National Chapters to the global Movement. As part of TI-S' (re-)accreditation process of National Chapters (see page 19 for an overview of criteria), Charter-relevant indicators are reviewed (e.g. Board composition and independence, advocacy activities, or financial management). It is positively noted that an envisaged update will also include issues around gender and diversity as well as on feedback and complaints handling mechanisms. While no dis-accreditation took place in 2014, one to two typically occur per year. The Panel understands that TI-S has always been explicit about the fact that Charter membership is for them only and not for TI as a whole – i.e. TI-S is keen to ensure the relative autonomy of its 116 affiliates. However, it is also true that the Chapters act in the name of TI, often bear their logo and might receive funds from the Secretariat for cooperation work. Moreover, as we look at what accountability really means and how to demonstrate this with an international NGO, it becomes increasingly hard to assess this when only considering TI-S. Against this background, the Panel urges TI-S, as with other Charter Members who have only joined with their international secretariat, to use whichever process is most applicable in the circumstances to also ensure adherence to the Charter Commitments at the national / regional level. The tri-annual accreditation review of National Chapters is a good opportunity and tool to consider how the standards inherent in the Accountability Charter can be reflected at national levels. The Panel looks forward to hearing about progress in this regard and the Charter Secretariat stands ready to advise further on this.
3.10 – 3.11		***Reporting parameters*** *Fully addressed*
IV. Mission, Values, Governance, and Stakeholder Engagement		
4.1		***Governance structure*** *Fully addressed* As in previous years, the answer provides a very good overview of TI-S' governance structure. The diagram (page 12) clearly describes structure, relationships and processes. It is acknowledged that 32 of the overall 127 Members of TI are Individual Members. The total amount of Individual Members is limited by policy to 1/3 of the overall membership.
4.2 – 4.3		***Division of power between the governance body and management / Independence of Board Directors*** *Fully addressed*
4.4		***Feedback from internal stakeholders*** *Fully addressed* The answer provides a solid description on how internal stakeholders have ample opportunities to engage with the Board and the Annual Membership Meeting as the highest decision-making body. Evidence how this has e.g. influenced the formulation of TI-S' public statement on multinational

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	companies is provided. 4.10 describes that the international secretariat is working on developing an online internal communication environment in order to generate exchange and better support for internal accountability.
4.5	**Compensation for members of highest governance body** *Fully addressed* TI-S can be again commended for a very thorough and inclusive process to develop their salary scale (2007) and to comprehensively review it (2012). The total amount of salaries paid to the Managing Director and five Group Directors in 2014 was EUR 870,662. Outgoing managers are not provided any benefits; however, new staff from abroad might receive payment for relocation according to the Relocation Allowance Policy. The Panel would be interested to know if senior leadership receives any remuneration from outside and if yes, whether this is published.
4.6	**Conflicts of interests** *Fully addressed* The organisation gives again a very in-depth account of the TI Board Code of Conduct and the TI Conflict of Interests Policy; the latter one also applies to National Chapters. It is commendable that the compilation of all Board members' registers of interest is systematically circulated to each Board member to support mutual accountability among the Board on conflict of interest management.
4.10	**Process to support highest governance body's own performance** *Fully addressed* TI-S describes solid procedures for the appointment and term limits of Board members. The main findings from the Board's annual anonymous self-evaluation are shared at the Annual Membership Meeting. The recent Board self-evaluation identified significant disparities and it was agreed that the current process does not adequately support the strengthening of the Board's effectiveness. Thus, the Board Governance Committee was commissioned to recommend an updated system, which will be presented in the 2016 report.
4.12	**Social charters, principles or other initiatives to which the organisation subscribes** *Fully addressed*
4.14	**List of stakeholders** *Fully addressed* TI-S has provided great clarity on their stakeholders vs. those of TI National Chapters. They described their engagement with National Chapters as well as provided links for more formal institutional relationships. More concrete information on their role as "coalition builder" would be appreciated in the next full report.
4.15	**Basis for identification of stakeholders** *Fully addressed* The response provides very well laid out information on how national partners, potentially growing into Chapters, are selected, accredited and re-accredited. The visual description of the indicators used to inform the criteria for (re-)

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accreditation (page 19) is very helpful, and it is positively noted by the Panel that accreditation tools (e.g. the Self-Evaluation Form) are regularly updated to reflect increasing importance of issues such as gender and diversity, and complaints mechanisms.

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	***Involvement of affected stakeholder groups*** *Fully addressed* TI-S seeks to apply participatory and accountable design, implementation, monitoring and evaluation practices throughout their work. Beyond the organisation's engagement with institutions in its international advocacy, their interactions with people as affected stakeholders mostly take place in the context of projects and programmes where TI-S is working with National Chapters – e.g. in the Advocacy and Legal Advice Centres (ALACs). Evidence for increased people engagement in 2014 is provided and there is a growing trend of National Chapters mainstreaming the support to victims and witnesses of corruption in their operations. There is positive evidence of the mainstreaming of projects supporting victims and witnesses into approaches that are central to the work of TI Chapters and informing global advocacy. What remains unclear is the extent to which TI-S is responsible for anti-corruption activists of the whole movement? In follow-up to a previous Panel question, TI-S clarifies that the accreditation contract between TI-S and National Chapters requires that their policies be *not inconsistent* with TI policies. The double-negative, whereby 100% consistency is not required, captures the diversity of the Movement and high level of independence of its parts, based on shared values and a common goal. Nevertheless, alignment with the global strategy is reviewed every three years as part of the re-accreditation process.
NGO2	***Mechanisms for feedback and complaints*** *Addressed* TI-S has an exhaustive complaint-handling mechanism, including external ones. The general global policy of handling complaints is that the organisation's international Board Ethics Committee is competent to receive complaints about Chapters. However, the Committee cannot receive external complaints – as clarified from TI-S upon request. It is acknowledged that the organisation will show updates of their TI-S Ethics infrastructure and complaints mechanisms in the 2015 report, and how these relate to those of National Chapters. In a bilateral meeting with the Panel in December 2015, TI-S confirmed that they have improved the visibility of how to file an external complaint and have clarified available steps – i.e. TI-S Ethics Advisor's contact details are publicly available and the process for external complaints about National Chapters is outlined (here). The accreditation process expects TI National Chapters to have their own feedback processes and TI-S is currently looking at being more specific about what would be expected of them in that respect. This information was shared with the Charter Secretariat upon request. The Panel is interested to understand the relationship between National Chapters and TI-S in regard to handling feedback?

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	For example, how are complaints received at Chapter level against TI-S forwarded to the International Secretariat?
	In 2014, the TI-S Ethics Advisor recorded 30 complaints and requests for advice from within the secretariat – all related to issues of conflict of interest management, recruitment or grievances and all were intensively discussed. The same number and information is also reported under NGO9 since these relate to internal complaints (and not feedback from external stakeholders). Two external complaints against a National Chapter were reported in 2014. While it was eventually concluded that the allegations were unsubstantiated, lessons were learnt to improve the organisation's complaints mechanisms. TI-S confirmed in their bilateral conversation with the Panel (2015) that they will explore how to better aggregate their knowledge of global trends in complaints across the movement to inform Board and management decisions. The Panel commends these efforts by TI-S and looks forward to being updated in this regard.
	Finally, the Panel appreciates that TI-S' Board endorsed a Whistleblower Protection Policy in 2014, encouraging people to speak up and outlining clear structures and capacity to ensure that they can do so without fear.
NGO3	**_Programme monitoring, evaluation and learning_** _Fully addressed_ The response describes the organisation's solid Monitoring, Evaluation, and Learning (MEL) mechanism and learning events in order to improve organisational performance and anti-corruption impact. In 2014, TI-S developed a highly participatory Movement-wide impact monitoring approach (IMA) which consists of an impact matrix and in-depth impact assessments. In combination with the graphical depiction on page 21, this IMA is seen as **Good Practice** for other organisations. Moreover, it is commendable that evidence is generated to enable more informed decision-making as well as increased accountability of TI-S, notwithstanding the language, reporting and mainstreaming challenges identified by TI-S at the bilateral meeting with the Panel in December 2015. Independent evaluations to assess the effectiveness of projects are published on TI-S' website (here). Specific examples how these efforts have actually led to positive management responses would be helpful for the reader. Finally, the Panel appreciates that TI-S' overall aim is to become a learning organisation. As requested in the previous feedback, the Panel would like to hear more about lessons learnt from the MEL Mentoring project with first National Chapters and test results from the piloting of the pocket-guide on _Monitoring and Evaluation in a Nutshell_.
NGO4	**_Gender and diversity_** _Fully addressed_ As a commendable milestone, the inclusive Gender and Diversity Policy was approved in early 2014. The Gender Task Force, specific training events for staff, and supporting National Chapters to tackle diversity inequalities can all be seen as exemplary activities. Nevertheless, TI-S highlights that parity at salary and a gender imbalance at senior positions are still areas for improvement (see also LA13). Is there a timeline for improvement steps?

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NGO5	***Advocacy positions and public awareness campaigns*** *Addressed* The response refers to the clear and inclusive Guidelines for TI Policy Positions and Guidelines for TI Working Papers as the main tools and processes to identify, formulate and disseminate public advocacy positions. The Rapid Response Unit strengthens this approach. The Panel looks forward to seeing evidence how this might be further improved by information coming in through newly established feedback mechanisms (NGO2). While TI-S states that corrective adjustments or re-thinking an advocacy strategy have happened in the past, the answer would profit from a concrete example in this regard. Is there a clear exit strategy for campaigns?
NGO6	***Coordination with other actors*** *Fully addressed* The answer provides relevant information about TI-S' strategic approach to partners. Institutional relationships are published on their website (here). It is positively noted that the organisation took on board last year's Panel feedback and provides evidence-based examples that partnerships with ONE, Global Witness or the OECD leveraged TI-S' work in the specific areas of cooperation. Another follow-up in regard to concrete criteria for partnering is the development of TI-S' Code of Ethical Advocacy in 2014-2015. It applies foremost to TI-S but adoption will be encouraged within the TI Movement and by coalitions they work with. It will be interesting to see in the future how TI-S ensures that National Chapters and partners meet these high standards of accountability and do not engage in illegal / unethical practices.
**II. Financial Management**
NGO7	***Resource allocation*** *Addressed* As in previous years, TI-S provides again a very good outline on thorough budgeting and effective resource allocation processes as well as accounting practices applied, affirming that their accounts are prepared according to International Financial Reporting Standards and externally audited with links to the auditor's statement provided. The Board has recently approved a TI-S Financial Manual establishing internal controls. It is assumed that provided figures are stated as 1,000 EUR but clarification would be helpful in the next full report. However, while the described processes appear solid, a German investigative platform questioned in October 2015 the transparency around TI-S' International Anti-Corruption Conference in 2012 in Brazil (see article here). Apart from the inability to present comprehensive conference accounts, corporate sponsors were not included in the conference accounts. TI-S has admitted that its financial reporting on the conference lacks transparency which is mainly due to the budget being split into the local component as well as its own reporting. The Panel hopes that this incident has triggered thoughtful internal review of TI-S' financial management.
NGO8	***Sources of Funding*** *Fully addressed* Very open information is given on the income including the five largest single

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donors in 2013 (90% coming from government donor agencies). It is appreciated that TI-S outlines in detail how they ensure independence from their donors and how any donations are negotiated on the basis of their strategic priorities (see also TI-S Donations Policy). The Panel also appreciated progress to diversify TI-S' donor base (i.e. more support from the German and Swedish government and from foundations in comparison to 2013).

	III. Environmental Management
EN16	**Greenhouse gas emissions of operations** *Fully addressed* The answer provides a comprehensive breakdown of TI-S' indirect greenhouse gas emissions. The organisation explains that its operations as an advocacy organisation do not involve direct emissions. Reasons for the increase of CO_2 emissions in 2014 in comparison to 2012 and 2013 are given in EN18.
EN18	**Initiatives to reduce emissions of operations** *Fully addressed* While limiting their environmental impact is part of TI-S' code of conduct, the organisation did not progress in reducing its greenhouse gas emissions rather overall emissions increased by one third in 2014. This might be due to more consultant and volunteer travel and to increased activities with National Chapters. TI-S commits to develop and implement a well-informed Environmental Policy, smart routines, adequate resourcing, and targets by mid-2016.
EN26	**Initiatives to mitigate environmental impact of activities and services** *Partially addressed* Flights are regarded as the main environmental risk of TI-S. It is appreciated that the envisaged Environmental Policy shall also specify the approach to minimising environmental impact in TI-S' activities and services. Other interesting mitigation efforts are listed (e.g. e-folders at conferences or automated light switches) but can only have minimal effect over the environmental impact of the organisation's flying.
	IV. Human Resource Management
LA1	**Size and composition of workforce** *Fully addressed* As in previous years, the answer provides detailed information on the workforce composition by region, employment type and contract, and pay grade.
EC7	**Procedure for local hiring** *Fully addressed* Being situated in Germany, TI-S shows a good commitment to a diverse workforce rather than local hiring. In this regard, TI-S currently employs staff of over 40 nationalities to represent a broad, balanced and diverse picture of the whole movement (see also TI-S Recruitment Policy). With staff at the International Secretariat being mainly hired in Berlin, it is obvious that there is a strong European bias. Although TI-S has no control, it is noteworthy that most National Chapters are led by nationals.
LA10	**Workforce training** *Fully addressed* As in previous years, TI-S presents a thorough approach to staff training – from

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	identifying needs, to attending training, evaluating outcome and sharing that with relevant staff and managers for assessment. Related costs amounted to approximately 66,000 EUR in 2014. While overall training hours per staff (average of 2.6 days in 2014) decreased in comparison to 2014, it still exceeds the two-day target as set out in the annual plan for 2014, and the range of topics and themes offered is impressive. Finally, evidence is provided that feedback from staff showed positive results and the Induction Programme underwent small improvements based on participants' comments.
LA12	***Global talent management*** *Fully addressed* The answer describes a very systematic approach to devising personal development plans with all staff, which are well aligned with TI's strategic priorities and the staff member's personal development needs. TI-S is commended for conducting reviews with all employees at least twice a year. TI-S is also commended for successfully carrying out an Employee Engagement Survey (EES), 360° Feedback and a Line Management (LIMA) Survey. TI-S admits that its evolving operational structure alongside its priorities have not enabled the organisation "to provide adequate focus on longer-term talent need assessment or career planning". The relatively small size of TI-S further limits the ability to offer 'vertical' growth for staff and alternatively the ability to offer 'lateral' development to staff is being established.
LA13	***Diversity of workforce and governance bodies*** *Fully addressed* The answer provides well laid out gender and age representation within staff and the Board of Directors. Regional representation of the Board is also ensured. In addition, LA1 outlines TI-S' principle of non-discrimination and equal treatment of every staff member. However, TI-S admits an unsatisfactory gender imbalance with regard to salaries which is currently being reviewed. Is there positive change following from the implementation of the final Gender and Diversity Policy?
NGO9	***Mechanisms to raise grievances*** *Fully addressed* The movement's staff can raise grievances through the Board Ethics Committee. Moreover, the TI-S Ethics Advisor can assess complaints and give confidential advice on ethical questions to staff members and other stakeholders. There were 30 recorded cases in 2014. The TI-S Grievance Policy, Whistleblower Policy, and Works Council support that complaints from staff are taken seriously and can be taken up to Board level if necessary. In line with this, an independent Ombudsman was appointed in 2015 and examples for Works Council involvements are presented. The relation between the different processes of TI-S Ethics Infrastructure is comprehensively displayed in a new chart (page 37) which is also put publicly on office walls of TI-S.
V. Responsible Management of Impacts on Society	
SO1	***Managing your impact on local communities*** *Addressed*

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	TI's National Chapters' local reach and expertise have been essential to achieve collective impact. TI-S supports National Chapters in their engagement with communities but does not work directly with communities themselves. Post-intervention evaluations and the Mid-Term Review (MTR) are made available online and the organisation upholds high standards of human rights and child protection. TI-S can be commended for the final Impact Monitoring Approach (IMA) which assesses the achievements as well as the negative or unintended consequences of TI's work – such as undermining local hiring markets, negatively affecting existing power balances, or not sufficiently respecting local values. As per NGO3, it will be interesting to see how these lessons are reflected upon internally and utilised to inform future programming as part of the IMA. The Maldives case study, demonstrating how the Chapter's provision of support to migrant workers had a broader impact, illustrates important lessons for reflection. It will be useful in future reports to see evidence on how the recently adopted Whistleblower Policy improves channels for communication and reduce negative consequences as well as reflecting on data captured by the IMA and case studies such as the Maldives are used by TI-S to improve practice.
SO3	**Anti-corruption practices** *Fully addressed* The answer provided describes sound procedures and bodies (TI Conflict of Interest Policy, TI-S Code of Conduct, Ethics Advisor, TI-S Ethics Council, Ethics workshops, TI-S Procurement Guidelines, Delegation of Authority Policy or Whistleblower Policy) in place. These measures shall ensure that corruption issues are mainstreamed in all aspects of TI-S' work. The Ethics Advisor confirmed a strong awareness and sensitivity among staff which also implies peer regulation. Evidence that this had led to concrete instances of prevention or detection is welcome in the next report. It is positively noted that one single policy for all anti-corruption principles for external communication should be adopted by 2016.
SO4	**Actions taken in response of corruption incidents** *Fully addressed* Transparency reports that no instance of fraud or corruption was found in 2014.
VI. Ethical Fundraising	
PR6	**Ethical fundraising and marketing communications** *Fully addressed* The answer describes a well laid out procedure on fundraising in line with the TI-S Donations Policy and the Clearance Procedures for the Submission of External Funding Proposals. Due diligence on potential new donors is reported to take place every time when financial support for TI-S' work sought from such donors. A due diligence form outlines specific criteria for the cooperation with the private sector. TI-S states that there were no formal donor complaints received in 2014.

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