Feedback from the Independent Review Panel
Review Round March 2016

13 April 2016

Dear Tariq Abdoun,

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 Islamic Relief Worldwide

Islamic Relief Worldwide's accountability report is good and comprehensive – in particular for being their first report submitted to the INGO Accountability Charter.

In terms of **institutional commitment** to accountability, the report provides convincing insights on the importance of accountability for IRW's activities and strategic thinking. Accountability is understood as "enabling poor people to shape their future". In addition, the Panel would welcome more details on *how* accountability and IRW's Accountability Framework drive management decision-making. IRW mentions Charter membership and links to the Charter's website (here). This is highly appreciated so that stakeholders know what the organisation has committed to. All Full Charter Members are furthermore requested to publish the Charter logo and IRW is highly encouraged to do so. The Charter will only be seen as a strong collective agreement of the entire sector to accountability if Members actively and proudly support communication around it.

While the presentation of policies appears to be rather complete, demonstrating relevant and concrete **evidence** that these policies work well in practice could be further improved in some areas (e.g. demonstrating that coordination with other actors or workforce training work well in practice).

Direct links to mentioned policies are missing throughout the report and IRW is encouraged to provide these in future reports. Moreover, relevant **weaknesses** or missing issues are highlighted in the enclosed **Improvement Analysis**: Details on IRW's systematic process of working with partners including ensuring high accountability standards are met by them (NGO6); global procedures for local hiring (EC7); low number of performance reviews (LA12); imbalance between female and male (senior) staff and Trustees (LA13); as well as the low number of anti-corruption trainings (SO3). Finally, the Panel would also welcome greater clarity on governance of IRW as a global family, rather than of IRW UK.

On the positive side, the organisation is commended for their meaningful approach towards complaints handling from beneficiaries, including translation of the Complaints Policy into local languages and digital recording for illiterate complainants (NGO2), which is seen as **Good Practice**. It is also appreciated that certain shortcomings are presented openly and in a self-critical way.

The Panel commends IRW for their first accountability report and is overall satisfied with it. In recognition of this, the organisation moves from Affiliate to Full Membership with immediate effect.

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.

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If you have any other feedback or comments on our work, please share them with us by sending them to the Charter Secretariat. We are also available for bilateral conversations with Members' senior leadership team and look always forward to hearing your views.

Yours sincerely,

Louise James   ·   Michael Röskau   ·   Jane Kiragu

Rhonda Chapman   ·   John Clark   ·   Saroeun Soeung

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Islamic Relief Worldwide

Accountability Report 2014

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	**Statement from the most senior decision-maker** *Partially addressed* The report's concise opening statement by the CEO of Islamic Relief Worldwide (IRW) provides an overview of the strategic relevance of accountability towards IRW's work. Accountability is understood as "enabling poor people to shape their future". IRW's Accountability Framework is in existence since 2006 and a direct link to this policy would be appreciated. The Charter is further used as "an additional driver to build IRW's accountability" to their stakeholders. The Panel would welcome more details on *how* accountability and IRW's Accountability Framework drive management decision-making. Moreover, the statement would have benefited from a more self-critical account on the reporting year – what has worked and what not and what needs to be handled in a different way from a senior perspective? It would also be interesting to understand what accountability specifically *means* to IRW, i.e. what their definition is. The Charter's accountability definition can be found here on the right.
II. Organisational Profile	
2.1	**Name of organisation** *Fully addressed*
2.2	**Primary activities** *Addressed* While the response provides an interesting overview of IRW's overarching aim and general activities, more specific examples would have been helpful – in particular how these concretely support attainment of IRW's mission and strategic goals.
2.3 – 2.7	**Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience** *Fully addressed* The numbers presented in 2.7 seem overly exact and a short explanation on the methodology used might be helpful in future reports.
2.8	**Scale of organisation** *Addressed* This response provides relevant and interesting insights on IRW's financial status and programme expenditure in 2014 as well as on the four main strategic focus areas. The number of staff is provided under LA1 (page 28) and the lack of

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	numbers of volunteers is acknowledged with a pledge to collect such data from July 2015 onwards.
2.9 – 2.10	***Significant changes / Awards received*** *Fully addressed*

	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* IRW is commended for senior leadership throughout the compilation of this accountability report. The CEO has introduced the Charter and reporting process to all Directors and encouraged their participation. Different stakeholders were responsible for different sections of the report and provided information was discussed in follow-up meetings. IRW also provides an honest account of challenges faced throughout the reporting process and the Panel would be interested to know more about the particular areas for which it was difficult to define ownership within the organisation. It is very much appreciated that already the process of writing the report has helped IRW to identify improvement areas which will form the basis of a quality improvement plan along with this Panel feedback. Ownership at Director level will be ensured to drive internal accountability aligned with IRW's forthcoming 2016-2020 strategy. The Panel recommends to widely disseminating the Panel feedback within IRW and its country offices. Educo has e.g. created an executive summary of their report (here) to make the content more accessible for internal or external stakeholders.
3.6 – 3.7	***Report boundary / Specific limitations*** *Fully addressed* The Panel looks forward to hearing more about the uniformity and compliance of IRW's universal set of quality and assurance standards in line with Charter commitments in future reports. Moreover, the organisation is encouraged to clarify in more detail whether future reports cover the full IRW family, the part that is administered by IRW UK or just IRW UK.
3.8	***Basis for reporting*** *Fully addressed* The Panel supports including minimum accountability standards in license agreements with Islamic Relief Partners and looks forward to progress in 2016.
3.10 – 3.12	***Significant changes / Reference table*** *Fully addressed* A reference table is not necessary since IRW follows the usual GRI structure and numbering.

	IV. Mission, Values, Governance, and Stakeholder Engagement
4.1	***Governance structure*** *Partially addressed*

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	Relevant information on IRW's global structure, different level of authorities, and the international office's (Birmingham) responsibilities is provided. However, specific information on the organisation's governance structure is missing, apart from the fact that the Board of Trustees consists of six trustees. What are the specific responsibilities of this Board (apart from directing "the governance process by planning the future mission, performance and strategic direction" as outlined in 4.2)? Are there different committees to ensure compliance with IRW's strategy? It is mentioned that the Board of Trustees agreed to changes in the governance in 2014 and it would be interesting to spell these changes out in more detail in the next report. Moreover: Is there an effective risk analysis and management approach in place, which e.g. includes a risk registry, assessment of risks to staff and allocation of responsibilities for responding to risks?
4.2 – 4.3	*Division of power between the governance body and management / Independence of Board Directors* *Fully addressed* Different layers of the governance structure and bodies are described; however, the next report could outline the Board of Trustees' roles and responsibilities in greater clarity.
4.4	*Feedback from internal stakeholders* *Addressed* General information about mechanisms for internal stakeholders to provide direction is shared – e.g. the Family Council, IRW's extranet site, recorded "Brown Bag" meetings, team or departmental meetings and working groups. While it is shared that discussed issues from these forums can be escalated up to the Board of Trustees, it would be interesting to provide *actual* evidence that staff recommendations have shaped decision-making in the past.
4.5	*Compensation for members of highest governance body* *Addressed* The Panel appreciates that the current procedure for the Board of Trustees' expenditures will be revised in the ongoing governance reform project. Are there any rough figures of current Board compensation? Are Trustees only compensated for out-of-pocket expenses? Moreover, the Panel would be interested in a direct link to the mentioned pay scale in the next report in order to receive a more comprehensive picture of salaries paid. Finally, the Panel would like to know if there are any severance agreements for senior management in place.
4.6	*Conflicts of interests* *Partially addressed* IRW shares comprehensive information on how conflicts of interests are managed. A link to the Memorandum of Articles would be appreciated in the next report. Is there a particular Conflict of Interest Policy in place? Are Trustees' registers of interest externally published?
4.10	*Process to support highest governance body's own performance* *Partially addressed* The Board currently conducts an annual self-evaluation based on outlined goals and criteria. The Panel supports that IRW is currently reviewing this performance

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	process and will develop a more effective system of Key Performance Indicators. It will be furthermore interesting to see if KPMG's Board of Trustees training in 2016 will lead to positive results. Overall, information is missing on term limits and appointment procedures. The Panel furthermore suggests that IRW publishes Board of Trustee meeting minutes on their website. Are these at least disseminated throughout IRW?
4.12	***Social charters, principles or other initiatives to which the organisation subscribes*** *Fully addressed*
4.14	***List of stakeholders*** *Fully addressed*
4.15	***Basis for identification of stakeholders*** *Addressed* While the answer provided outlines clear criteria for the identification of stakeholders, it would be furthermore interesting to know how different stakeholders are prioritised in different contexts.

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	***Involvement of affected stakeholder groups*** *Fully addressed* IRW is commended for engaging stakeholders in the whole project cycle management process, using different formats of involvement and supporting strong collaboration throughout. The organisation's seven levels of participation and key features of their Participatory Monitoring & Evaluation are commendable. Good evidence and illustrative examples are given on how the engagement processes have influenced projects and decision-making, as well as have led to changes in the procedures (e.g. Mali). The Panel would appreciate a direct link to the mentioned Participation for Accountability toolkit in the next report.
NGO2	***Mechanisms for feedback and complaints*** *Addressed* IRW provides a very strong rational for complaints mechanisms in the CSO sector in order to make beneficiaries active powerful recipients and to redress existing power imbalances between donors and recipients. The organisation's Complaints Handling Policy forms part of the Islamic Relief Handbook which every employee is expected to read; a Complaints and Response Mechanisms toolkit is furthermore available. While sufficient details on the timeline and responsibilities are provided, direct links to the mentioned Policy and toolkit are appreciated in the next report. The Panel could not find them on the website, in spite of the report saying how important it is for stakeholders to have a right to complain. It is commendable that every country office is required to translate the Complaints Policy into the local language and that digital recording is available for illiterate complainants. This is seen as **Good Practice** for other organisations.

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	However, information is missing on the number and types of complaints received and if these could be resolved. In this regard, the Panel strongly supports IRW's plans to undertake efforts to analyse the data collected.
	The Panel is aware that IRW has had to field difficult issues as a result of unfounded allegations raised by the governments of Israel and UAE, both of which were reported in the media as having banned IRW for its links to "terrorist" organizations. The Panel recognises that IRW took the mature step of commissioning an independent audit that showed there was no basis for such allegations, and that certain governments (such as of USA, Sweden and Norway) supported IRW by challenging the allegations. The Panel respects the steps IRW took to discuss the issue with its main stakeholders and regret that HSBC preferred to end its links with IRW, unlike IRW's other banks, which were more understanding. These events illustrate the difficult environment that Islamic CSOs work in today, and the Panel stands prepared to help counter such unfounded aspersions regarding IRW's governance in future.
NGO3	***Programme monitoring, evaluation and learning*** *Fully addressed* The organisation presents a well-developed evaluation framework detailing the levels, responsibilities and requirements for evaluation of their operations – both internal to each country office and external from the Head Office. Due to lacking capacities, not all of the presented efforts are systematically implemented but IRW is endeavouring to do so. Furthermore, illustrative examples show programme adjustments and management response from learning. Finally, the Panel looks forward to results from developed impact studies in the next report.
NGO4	***Gender and diversity*** *Fully addressed* Relevant information, although sometimes repeated, is provided on how IRW integrates gender and other diversity issues into their programme cycles. The organisation's gender justice policy statement (page 21) is absolute in promoting and protecting diversity which is included into MEL of all projects. A link to the mentioned Gender Action Plan, translating policy commitments into practice, would be appreciated in the next report. Moreover, the Panel appreciates engagement in the consortia project "Age and Disability Capacity Programme" headed by another Charter Member (HelpAge). It will be particularly interesting to see in the next report, how IRW works holistically beyond people with Islamic belief. IRW's target is to have 100% of their field offices and programmes gender-just. However, baselines for this are yet to be conducted. The Panel looks forward to evidence and positive progress in reaching this target. Are there targets for other diversity factors in place?
NGO5	***Advocacy positions and public awareness campaigns*** *Addressed* IRW has only formally introduced advocacy programmes into their global mission statement in 2011. A policy for approving policy positions amongst the organisation was completed in 2014 – a link and more details (e.g. evidence-base, stakeholder

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engagement, corrective actions or strategies for exiting a campaign etc.) will be important in the next report. An interesting example was given of a project to counter female genital mutilation (FGM) in Sudan, where the local imam was supportive. What efforts have been made to advocate anti-FGM thinking amongst Imams elsewhere? Moreover, the Panel looks forward to developments of the Global Advocacy Working Group.

NGO6	**Coordination with other actors** *Partially addressed* The answer provides relevant information on the avoidance of duplication and how IRW works in consortiums to leverage each other's expertise (e.g. BOND, ECOSOC, UNHCR, World Vision and governments). A systematic process in this regard could strengthen current efforts. For future reporting, IRW is encouraged to demonstrate how they assist partners meet the same high standards of accountability. Are any commitments to accountability included in the selection process (beyond the rigorous due diligence) and MOUs? It would also be interesting to review how the approach to work more closely with partners has influenced positive results.

II. Financial Management

NGO7	**Resource allocation** *Fully addressed* IRW shares the link to their audited financial report as well as information on effective resource allocation, tracking of resources and thorough control frameworks in place. A link to the mentioned Financial Procedures Manual will be appreciated in the next report.
NGO8	**Sources of funding** *Fully addressed* Relevant information on IRW's main funders is provided. However, it is quite difficult to understand how the global income figure (£182M) is arrived at. The IRW UK and IRW partners, foreign fundraising etc. all come to £99M – so where does the other £83M come from? Who are the original donors behind national IR fundraisers? Are these funds raised by IR partners that do not go through the IRW head office in UK? The Panel asks for a clearer presentation in future reports about income received by IRW headquarters, income received by other IRW entities, and transfers between them. It would be useful, also, to summarise income sources (i.e. public or private sources).

III. Environmental Management

EN16	**Greenhouse gas emissions of operations** *Fully addressed* IRW provides baseline data from their Carbon Model analysis report for 2013 which also covered field office activities. This report triggered the organisation's focus to reduce the highest areas of direct carbon generation (and not concentrate on indirect emissions). The Panel looks forward to future comparable data in this regard.

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EN18	**_Initiatives to reduce emissions of operations_** _Addressed_ IRW has introduced a carbon monitoring plan concentrating on direct energy use, staff travel and cargo shipments. Furthermore, a carbon reduction strategy has been formulated in 2014 with a staged approach to monitor, reduce and offset their emissions. Is this systematic approach to environmental management guided by senior management oversight and regular assessment? Has IRC set concrete reduction targets? The Panel looks forward to progress in coming years and the Charter Secretariat can establish contacts to other Member organisations who already have good systems in place.
EN26	**_Initiatives to mitigate environmental impact of activities and services_** _Addressed_ Electricity causes the majority of greenhouse gas emissions from IRW. Are there any forms of conducting environmental assessments prior to carrying out activities? The organisation's Climate Change Policy and the environmental toolkit for working with Muslim communities of faith to bring about environmental protection within their programmes both sound like commendable approaches. Links to these documents will be welcome in the next report.

IV. Human Resource Management	
LA1	**_Size and composition of workforce_** _Addressed_ The answer provides an interesting breakdown of the workforce according to geographical region – including a high number of volunteers in Turkey/Syria. However, data is missing on different contract types (part- or full-time) and responsibility levels are only provided for IRW and Islamic Relief UK.
EC7	**_Procedure for local hiring_** _Partially addressed_ Information is missing on IRW's approach to local hiring including senior staff, mostly due to different processes in each country. How does the organisation ensure that hiring practices around the world build overall capacities (and do not undermine the local public or CSO sector)? A link to the central HR Policy would have been helpful in this regard. LA1 lists 224 "IRW/expats" and the Panel would welcome more clarification.
LA10	**_Workforce training_** _Partially addressed_ The establishment of the IRW Academy is commendable and the Panel looks forward how this "think tank" will improve capacity within IRW and to the whole sector. Approximately 400,000 GBP from 160,000,000 GBP (=0.25%) were used in 2014 to establish the IRW Academy and support internal staff development. It will be relevant for the next report to identify how much staff has participated in trainings and what process is used to evaluate training programmes.
LA12	**_Global talent management_** _Partially addressed_

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	IRW demonstrates their efforts to attract and retain talent. However, only 70% of staff have received appraisals and only 76% of staff have completed a personal development plan in 2014. What does IRW do to close the gap to 100%? Is there evidence that developing staff works well in practice?
LA13	**Diversity of workforce and governance bodies** *Addressed* LA1 (page 29) provides information on gender ratios by grade within IRW and Islamic Relief UK; however, these account only for about 10% of the global workforce. There is a large majority (69%) of male staff and no woman is employed in any of the top four grade levels. The Panel acknowledges that IRW is aware of this shortcoming and tries to attract female senior leaders. The Panel will track progress in reaching their identified target. Similar imbalances hold true for the Board of Trustees (only one female Trustee) and IRW also aims at improvements. While religious backgrounds and gender are adequately covered in this response, the Panel would be interested to know whether data is available on the ethnicity or age of staff. The Panel would like to motivate the organisation to think about which groups of people should be represented in their governance bodies and workforce to improve their legitimacy and effectiveness (e.g. age, disability or other). IRW is also encouraged to report as fully as possible on the global workforce – not just as UK-based staff – in future reports.
NGO9	**Mechanisms to raise grievances** *Fully addressed* The answer describes a comprehensive Grievance Policy for staff and it would be appreciated to link directly to the document in the next report. An investigation tracker is in place to ensure classification of different types as well as that cases raised have been addressed and resolved.
V. Responsible Management of Impacts on Society	
SO1	**Managing your impact on local communities** *Addressed* IRW demonstrates their general approach to manage the impact of their activities on the wider community – including needs assessments, situation analyses, problem analyses, stakeholder analyses, envisaged project impact and baselines prior to every intervention. Project proposals must also include information on the sustainability of the project and potential exit strategies. It is furthermore commendable that field offices are trained in conflict sensitivity and do-no-harm analysis to inform programme developments. The Panel would like to see evidence in the next report that this approach triggers positive results – e.g. what kind of feedback has IRW received from communities and how has the organisation reacted?
SO3	**Anti-corruption practices** *Partially addressed* IRW demonstrates thorough systems in place to prohibit, prevent, detect and report on cases of corruption, mostly via their internal audit programme. A link to the mentioned Anti-fraud, Corruption and Bribery Policy would be appreciated in the next report.

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	38 participants (presumably UK-contracted staff) were trained in the area of anti-corruption in 2014. Is there evidence that staff is aware of procedures in place?
SO4	**_Actions taken in response of corruption incidents_** _Fully addressed_ IRW openly presents three incidents of corruption in 2014 and which actions were taken in response.
VI. Ethical Fundraising	
PR6	**_Ethical fundraising and marketing communications_** _Fully addressed_ IRW provides relevant information on processes in place to ensure that fundraising is conducted in an ethical, respectful and adequate manner. The Panel would appreciate a link to the mentioned Media Policy and will follow up on progress to develop agreed standards with all national members. Very thorough details are provided from the Gifts-in-Kind Donations Policy, which will be reviewed in 2016 to incorporate breaches and complaints. There have been no recorded instances of complaints relating to fundraising in 2014.

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