

Feedback from the Independent Review Panel Review Round March 2015

Berlin, 08 April 2015

Dear Cobus de Swardt,

Many thanks for submitting your accountability report to the INGO Accountability Charter. Before providing specific feedback on your organisation's report, let us highlight three areas of general concern that occurred in most of the 15 reports submitted for the fall 2014 and spring 2015 review round:

1.) Be clear on why accountability is important for your organisation

For Charter reports to be meaningful, it is important to start with a clear description of the organisation's *specific* understanding of accountability and how this shapes strategic decision-making and operations in regard to governance, finance, programme, fundraising, campaigning, HR etc. Be clear about whom you are most accountable to and how communication with them improves achieving your strategic goals. Find [here](#) on our website the Charter's currently used definition. Throughout the report, let us know how you use accountability to continuously add value to your organisation.

2.) Moving from "GAP Analysis Table" to "Improvement Analysis"

It is the key aim of the INGO Accountability Charter to support continuous organisational improvements. Against this background the GAP Analysis Table was introduced to showcase at a glance where progress has been achieved and which areas need to be further addressed. We observed that this worked quite well for some, but not for all organisations. One difficulty being that it became overloaded with information without differentiating important and much less important issues. We therefore suggest that organisations for which this instrument has worked well, keep it as a very good internal document to follow up on progress. For the purpose of the reporting and vetting exercise, however, we suggest having a much more succinct "Improvement Analysis", capturing only the most relevant issues that need to be addressed. The Panel has tried to summarise these areas for your organisation at the end of this Feedback Letter. If this does not reflect your own priorities, please let us know. The "Improvement Analysis" is also considered to be the basis for the very brief interim reports of those organisations moving to biannual reporting.

3.) Level of Evidence

Our sector is often criticised for having very good intentional language, but few facts and figures to prove its claims. It is against this background that the Panel asks for compliance to be proven on three levels: (i) having a written policy, (ii) providing evidence that the policy is known and applied by staff and (iii) assurance that it leads to positive management response and helps improving effectiveness in achieving your organisation's goals. While much progress has been made at the policy level, evidence for application in practice and better impact is still relatively low. While we do acknowledge that it is not an easy task to provide this evidence for very large, international organisations, we have also seen some very good attempts. Some examples include: (a) reporting the percentage of national entities which comply with certain standards, (b) leveraging existing surveys that provide relevant hard data, (c) thorough globally set parameters, evidenced by random national level controls or d) illustrative case studies.

Please ensure that all the three points listed above are taken into consideration when collecting data for the next INGO Charter report.

Organisation-specific feedback to Transparency International

Transparency International's seventh accountability report is very good, overall accessible and comprehensive, providing web links and illustrative examples. Previous Panel feedback has been taken on board and this report demonstrates clear progress and improvements.

A number of answers can be seen as **Good Practice** for other CSOs: Procedures for conflicts of interest (4.6), resource allocation (NGO7), workforce training (LA10), 100% staff performance and career development plans plus 92% 360° feedback exercise for line managers (LA12), and mechanisms for workforce to raise grievances (NGO9).

Strongly-embedded **institutional commitment** to take accountability serious in all that Transparency does is provided in the CEO's opening statement. It is not entirely clear, however, how strong accountability helps TI achieve better impact. Please describe the strategic relevance of accountability to advancing the organisation's mission and how that translates into clear consequences for TI-S' strategy, programming, fundraising, communications, risk management etc.

This report is intended to drive continuous improvement with regard to good accountability practice and it is positively noted that Transparency self-critically reflects previous Panel feedback and commits to various improvements (e.g. Whistleblower Protection Policy, feedback systems for external stakeholders, Environmental Policy, Monitoring and Evaluation). In this regard, Transparency is commended for having submitted a very thorough **GAP Analysis Table** along with this report, clearly showing progress already made and promises for the future.

It is appreciated that Transparency has a sub-page on governance reporting and the INGO Accountability Charter ([here](#)) and publishes recent accountability reports and the Charter logo prominently. Moreover, it is positively noted that Transparency provides many links to mentioned policies and procedures throughout the report.

Weaknesses include that **evidence** is given in some instances but could be improved in regard to showing that described procedures and policies have actually been effective and led to positive management response. Furthermore, TI-S is asked to identify what accountability actually means for the organisation (see 1.1) and how they ensure that their commitments become more relevant of National Chapters. Moreover, advocacy organisations should ensure corrective actions and exit strategies in their policy work (NGO5) and the Panel strongly recommends that TI-S implements a fully functioning Complaints Handling Mechanism (NGO2) – the only minimum standard of the Charter so far.

As explained in the generic part of this feedback letter, the Panel decided to replace the old format of the GAP Analysis Table with a more succinct overview of identified **"Improvement Analysis"**. Based on this report's assessment, we have written this for you and you find it attached to this letter. From now on we will use this format serving as a baseline for you to summarise the most important progress made in these areas.

Overall Transparency International is commended for a very high level of transparency and accountability to its key stakeholders. Transparency could in this regard be eligible for biannual reporting if a fully functioning complaints handling mechanism was in place – the

only minimum standard for Charter Members. The Panel therefore urges TI-S to progress in this regard

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 08 May 2015.

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

Yours sincerely,

					
Louise James	Michael Röskau	Jane Kiragu	Rhonda Chapman	John Clark	Saroeun Soeung

**Review Round March 2015
Cover Note on Accountability Report**

Transparency International

Reporting period: Calendar year 2013

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	<p><i>Statement from the most senior decision-maker</i> <i>Fully addressed</i></p> <p>The report's opening statement provides a strong commitment to accountability to better serve those we are accountable to. It is not fully clear, however, how this leadership commitment to strong accountability helps TI achieving better impact. Please describe the strategic relevance of accountability to advancing TI-S' mission and how that translates into clear consequences for the organisation's strategy, programming, fundraising, communications, risk management etc.</p> <p>Moreover, different organisations have different focus points when looking at their accountability. Whatever TI thinks to be pivotal in their concept of accountability, it is essential to have a clear and shared understanding of the key elements. Only then can one push for progress and invite staff, partners and Board to participate in the journey of continuous improvement. It is 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. Defining TI-S' own approach to accountability and what it means concretely in regard to influencing their strategy, management and operations will be a good starting point when devising the new strategy.</p> <p>As TI successfully demands accountability from multilateral institutions, governments, the public sector and business it would be very helpful to understand better what exactly TI sees as core elements of accountability. The Charter's definition can be found online.</p> <p>Finally, the Panel supports TI's self-reflection that there is room for improvement in accountability towards those they seek to ultimately serve. Clearly defining the relationship with their intended and unintended intermediary and ultimate beneficiaries will help in this regard.</p>
II. Organisational Profile	
2.1 – 2.2	<p><i>Name of organisation / Primary activities</i> <i>Fully addressed</i></p>
2.3	<p><i>Operational structure including national offices</i> <i>Fully addressed</i></p> <p>Whereas the information provided is solid, Transparency's Accountability Report 2012 was clearer in regard to the description of the role of National</p>

	Chapters. TI-S' services towards Chapters is outlined under 2.2.
2.4 – 2.6	Headquarter location / Number of countries / Nature of ownership <i>Fully addressed</i>
2.7	Target audiences <i>Addressed</i> It is acknowledged that defining target audiences is much harder for advocacy CSOs such as TI than service delivery CSOs. Nevertheless, it is an important criterion to determine strategy – both at international and national level. Does TI-S target corruption where people are most severely affected? Or do they rather target corruption where potential benefits are relatively large in relation to the input that is necessary? Does the organisation provide guidance to the National Chapters in this regard?
2.8	Scale of organisation <i>Fully addressed</i> This answer provides succinct, relevant and comprehensive data. However, as mentioned in the previous year, more content and not just financial information on the scope and scale of TI-S' activities is welcome.
2.9	Significant changes <i>Fully addressed</i> TI-S' global income increased by close to 20% from EUR 22,769,737 in 2012 to EUR 27,034,173 in 2013.
2.10	Awards received <i>Fully addressed</i> TI-S is commended for having received two awards in 2013: The European Excellence Award and the Creativity International Award.
III. Report Parameters	
3.1 – 3.4	Reporting period / Date of most recent report / Reporting Cycle / Contact person <i>Fully addressed</i>
3.5	Reporting process <i>Fully addressed</i> It is positively noted that the reporting process received input from different departments (Finance, HR, ME+L and Governance). How has this process changed results? Some Charter Members such as Amnesty International and CBM have even established cross-functional teams to determine the scope of the report, collate and edit the content, ensure that it is well targeted, and disseminated to key stakeholder groups and check progress towards organisational improvements against the Panel's development suggestions every six months. In this regard, the Panel supports TI-S' current developments to mainstream the reporting process across departments throughout the year as to enhance performance in the areas reported upon. It will be interesting to learn how the internal use of this process will have triggered improvements and if the envisaged target audience will have benefited from the report's publication.

3.6 – 3.7	<p>Report boundary / Specific limitations <i>Fully addressed</i></p> <p>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 (e.g. the engagement of stakeholders or marginalised groups, diversity within programme cycle etc.).</p> <p>It is overall difficult to get a sense of accountability at the national level and the Panel questions how TI-S ensures quality control over its franchise.</p>
3.8	<p>Basis for reporting <i>Partially addressed</i></p> <p>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 as National Chapters (see page 18 for an overview of criteria), Charter-relevant indicators are reviewed (e.g. Board composition and independence, advocacy activities, or financial management). Are there any examples of National Chapter that have not been (re-)accredited?</p> <p>Nevertheless, some indicators are not reflected (e.g. feedback and complaints handling mechanisms, environmental indicators, or gender and diversity issues in National Chapters and their programmes). Moreover, it would be interesting to learn what kind of information in regard to accountability <i>practices</i> is provided by the Chapters to TI-S and how is this processed and acted upon?</p> <p>The Panel understands that TI-S was explicit about the fact that Charter membership was for them only and not for TI as a whole – i.e. TI-S is keen to ensure the relative autonomy of its 113 affiliates. However, it is also true that the Chapters act in the name of TI, bear their logo and often receive funds from the Secretariat for cooperation work. Moreover, as we look at what accountability really means and how to demonstrate this, it becomes increasingly hard to really judge that when only considering TI-S. Against this background, we urge TI, just like all other Charter Members who have only joined with their international secretariat, to use whichever process is most applicable in the circumstances to ensure adherence to the Charter Commitments also at the national level. The accreditation process seems a good tool for TI to systematically embark on this journey and the Panel looks forward to progress and increasing references / examples as to how accountability is embedded in the National Chapters.</p>
3.10 – 3.11	<p>Reporting parameters <i>Fully addressed</i></p>
<p>IV. Mission, Values, Governance, and Stakeholder Engagement</p>	
4.1	<p>Governance structure <i>Fully addressed</i></p> <p>The answer provides a very good overview of TI's governance structure. The diagram (p.12) clearly describes structure, relationships and processes. It is acknowledged that 32 of the overall 126 Members of TI are Individual Members. It is stated that these might bring uneven operational involvement</p>

	and the TI Secretariat is developing ways of enhancing such engagement. Overall, it would be interesting to understand how TI-S has concretely ensured to limit Individual Member influence to a level that does not undermine this very democratic governance model.
4.2	<p><i>Division of power between the governance body and management</i> <i>Fully addressed</i></p> <p>In the last Panel feedback, it was recommended to concentrate this section on the <i>most important</i> duties of the Board of Directors only. However, this year's response is even more detailed in this regard. The Panel would be more interested to know how the separation of duties works well in practice given the complex governance structure.</p>
4.3	<p><i>Independence of Board Directors</i> <i>Fully addressed</i></p>
4.4	<p><i>Feedback from internal stakeholders</i> <i>Fully addressed</i></p> <p>The answer provides a good description on how internal stakeholders have ample opportunities to engage with the Board and the Annual Membership Meeting as the highest decision making body. Members were extensively consulted for the 2015 Strategy. Evidence how this has e.g. concretely influenced the Annual Membership Meeting agenda would be welcome in the next report.</p>
4.5	<p><i>Compensation for members of highest governance body</i> <i>Fully addressed</i></p> <p>TI-S can be commended for a very thorough and inclusive process to develop their salary scale (2007) and to comprehensively review it (2012). A link to the Relocation Allowance Policy would have been helpful. Finally, the Panel would be interested to know if senior leadership receives any remuneration from outside and if yes, is this published. Are outgoing managers provided with any benefits?</p>
4.6	<p><i>Conflicts of interests</i> <i>Fully addressed</i></p> <p>The organisation gives a very thorough account of the TI Board Code of Conduct and the TI Conflict of Interest Policy. Are these shared with National Chapters and do all Chapters have this or their own Conflict of Interest Policy in place? It is positively noted 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. This whole answer is regarded as Good Practice for other organisations.</p>
4.10	<p><i>Process to support highest governance body's own performance</i> <i>Fully addressed</i></p> <p>Transparency describes procedures for the appointment and term limits of Board members. Is the analysis of the Board's annual anonymous self-evaluation shared in an aggregate form with the public or with TI's members? Furthermore, more information how these procedures have <i>actually</i> supported the effectiveness of this body would be interesting in the next report.</p>

4.12	<i>Social charters, principles or other initiatives to which the organisation subscribes</i> <i>Fully addressed</i>
4.14	<i>List of stakeholders</i> <i>Fully addressed</i> As in the previous report, TI-S lists relevant stakeholder groups and links to its website for further information on institutional relationships.
4.15	<i>Basis for identification of stakeholders</i> <i>Fully addressed</i> 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-) accreditation (p.18) is very helpful.
4.16 – 4.17	<i>Moved to NGO1.</i>

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	<p><i>Involvement of affected stakeholder groups</i> <i>Addressed</i></p> <p>Transparency highlights the fact that it is an advocacy organisation and thus, does not have a standardised process for the involvement of affected stakeholder groups. Nevertheless, comprehensive examples of serious participatory engagement of beneficiaries are reported and the Panel looks forward to further progress in this regard.</p> <p>The Panel would welcome evidence that the described stakeholder engagement processes (e.g. feedback loop on project management) have positively affected decision making within Transparency. Moreover, the Panel would again like to understand how TI-S brings the various stakeholder relationships (National Chapters and others) and different elements together to ensure their strategic and policy consistency more broadly for the organisation and with the Charter.</p>
NGO2	<p><i>Mechanisms for feedback and complaints</i> <i>Partially addressed</i></p> <p>Transparency reflects the Panel's last feedback about a missing global policy for handling complaints. It is acknowledged that the organisation plans to develop more visible feedback channels about its work, as well as to evaluate these feedbacks more systematically. A fully functioning complaints and <i>feedback</i> mechanism is so far the only Minimum Standard for Charter Members. The Panel would also like to understand the reasons why this mechanism has not yet been implemented. TI-S and the National Chapters can find examples for well managed complaints and feedback mechanisms on the Charter website in the Good Practice database.</p> <p>For the moment, whereas it is positively noted that the TI-S Ethics Advisor's contact details are publicly available and any complaints would be assessed, it is</p>

	<p>noteworthy that no such complaints were filed in 2013. A commitment to accountability is only strong if people have easy access to hold an organisation to account and if people are actively invited to provide feedback and inform management decision for improvement. The Panel therefore advises TI-S to critically reflect if it is altogether a good sign that no complaints were actually received in 2013. Moreover, it is not clear from the website if the Ethics Advisor is also responsible for external (or only for internal) complaints.</p> <p>Finally, the Panel looks forward to being informed about progress in regard to TI-S Whistleblower Protection Policy.</p>
NGO3	<p><i>Programme monitoring, evaluation and learning</i> <i>Fully addressed</i></p> <p>The response gives valid information on a well laid out Monitoring and Evaluation mechanism, learning events, and a comprehensive graphical depiction of TI-S' ongoing reporting, reflection and learning. It is appreciated that major organisational evaluations can be accessed publicly on TI-S' website.</p> <p>The organisation reports that project planning and evaluation processes were made more effective and more targeted. Specific examples how this has actually led to positive management responses would be helpful for the reader.</p> <p>As for the national affiliates, the Panel looks forward to hear more in the next report about lessons-learned from the MEL Mentoring project with first National Chapters and test results from the piloting of the pocket-guide on <i>Monitoring and Evaluation in a Nutshell</i>.</p>
NGO4	<p><i>Gender and diversity</i> <i>Fully addressed</i></p> <p>As a follow up from the Panel's previous feedback, the organisation can now be commended for an inclusive definition of marginalised and vulnerable people in relation to the fight against corruption – beyond just gender issues. Amending procedures at the Advocacy and Legal Advice Centres (ALACs) accordingly to gather information on the affect corruption has on other marginalised groups is acknowledged.</p> <p>The appointment of gender focal persons in TI-S' different departments, working with a gender consultant, organising gender workshops and gender mainstreaming trainings (including a session with the Board of Directors), widely communicating the different impacts of corruption on women and men on TI-S' website etc. can all be seen as exemplary activities.</p> <p>A link to the newly developed Gender and Diversity Policy would have been appreciated. The Panel hopes that this does indeed mainstream diversity principles such as disabilities into other policies and processes. The Panel also looks forward to being informed about developments in communicating inclusion issues to donors and other external stakeholders as part of the Implementation Report 2014.</p>
NGO5	<p><i>Advocacy positions and public awareness campaigns</i> <i>Partially addressed</i></p>

	<p>Very good information is again provided on clear and inclusive tools and processes to choose, formulate and disseminate public advocacy positions (e.g. for the production of the <i>Global Corruption Report</i> or within the <i>Rapid Response Unit</i>). The Panel looks forward to seeing evidence how this is even further improved through the information coming in through newly established feedback mechanisms (NGO2).</p> <p>However, as mentioned in the Panel's previous feedback letters, more information would be welcome on the instruments in place for corrective action, where this becomes necessary, and the exit strategy for campaigns.</p>
NGO6	<p>Coordination with other actors <i>Addressed</i></p> <p>The answer is similar to the one last year and provides relevant but generic information about TI's strategic approach to partners. The organisation is asked to provide some evidence / practice based examples that their systematic approach to partnership has helped leverage TI's very specific contribution in a field with numerous actors. The Panel also encourages Transparency International to describe concrete criteria for partnering and how they ensure that their partners meet high standards of accountability and do not engage in illegal / unethical practices.</p>
II. Financial Management	
NGO7	<p>Resource allocation <i>Fully addressed</i></p> <p>The answer provided gives a very good outline on thorough budgeting and effective resource allocation processes as well as accounting practices applied. A link to TI-S' Financial Manual would be welcome in the next report. Overall, the whole answer is regarded as Good Practice for other organisations.</p>
NGO8	<p>Sources of Funding <i>Fully addressed</i></p> <p>Very open information is given on the income including the five largest single donors in 2013 (mainly 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 looks forward to being informed about the mentioned approach to diversify donors in regard to attracting more income from foundations and the private sector.</p>
III. Environmental Management	
EN16	<p>Greenhouse gas emissions of operations <i>Fully addressed</i></p> <p>The answer provides a detailed breakdown of TI-S' indirect greenhouse gas emissions. The organisation explains that its operations as an advocacy organisation do not involve direct emissions. Overall, CO₂ emissions in 2013 have remained similar in comparison to 2012.</p>
EN18	<p>Initiatives to reduce emissions of operations <i>Fully addressed</i></p> <p>Limiting their environmental impact is part of TI-S' code of conduct. The</p>

	<p>organisation has used more video-conferencing than in the past to limit the overall number of flights. Other initiatives include the conversion to 100% green energy.</p> <p>Under indicator EN26, Transparency International comments on the Panel's previous recommendation to implement an explicit Environmental Management Policy with senior management support, clear targets, a sound monitoring system, and visible responsibilities and championships within the organisation. The Panel looks forward to planned progress in this regard and how this will impact the organisation in the next report.</p>
EN26	<p><i>Initiatives to mitigate environmental impact of activities and services</i> <i>Partially addressed</i></p> <p>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. Nevertheless, it would be helpful to know in the meantime, what approach is currently taken in the operational work (e.g. decision for meeting venues or locations).</p>
<p style="text-align: center;">IV. Human Resource Management</p>	
LA1	<p><i>Size and composition of workforce</i> <i>Fully addressed</i></p> <p>As in previous years, the answer provides well laid out information on the workforce composition by region, employment type and contract, and pay grade.</p>
EC7	<p><i>Procedure for local hiring</i> <i>Fully addressed</i></p> <p>TI shows a good commitment to a diverse and local workforce. In this regard, TI-S currently employs staff of 40+ nationalities to represent a broad, balanced and diverse picture of the whole movement (see also the 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 influence on this issue, it is noteworthy that all National Chapters are led by nationals.</p>
LA10	<p><i>Workforce training</i> <i>Fully addressed</i></p> <p>Transparency presents a serious approach to staff training. The answer given shows a very good overview on training opportunities offered to TI staff and related costs. The organisation can again be commended for the overall increase in training hours per staff (average of 3.7 days in 2013). However, the section would profit from evidence that the trainings are actually successful – i.e. outcomes of the mentioned evaluation forms following each training session. The approach is thorough and well laid out from identifying needs, to attending training, evaluating outcome and sharing that with the relevant staff and managers for assessment. This is seen as a Good Practice approach.</p>
LA12	<p><i>Global talent management</i> <i>Fully addressed</i></p> <p>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 (100%) at least twice a year.</p>

	<p>TI-S is also commended for improvements found in the Line Management Survey which was undertaken to understand if line management development activities had been successful. Management 360° Feedback with 92% response rate is also positively acknowledged. This is both regarded as Good Practice.</p> <p>However, evidence that TI's talent management is working well in practice is welcome in the next report. Does the organisation have a good overall view on current and future talent needs and how are potential gaps closing over time?</p>
LA13	<p><i>Diversity of workforce and governance bodies</i> <i>Fully addressed</i></p> <p>It is positively noted that the TI-S Gender and Diversity Policy was created in 2013. The Panel looks forward to evidence of improved gender mainstreaming as a consequence to this policy. Overall, the answer provides well laid out gender and age representation within staff (in relation to the pay scale) and the Board of Directors. Regional representation of the Board is also ensured.</p>
NGO9	<p><i>Mechanisms to raise grievances</i> <i>Fully addressed</i></p> <p>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. Furthermore, the TI-S Grievance Policy and Works Council support that complaints from staff are taken seriously and can be taken up to Board level if necessary. Examples for Works Council involvements and results from consultations are presented. The relation between the different mechanisms and bodies is comprehensively displayed in a chart (p.36) that is also put publicly on office walls of TI-S. Overall, the whole answer is seen as Good Practice for other organisations.</p>
V. Responsible Management of Impacts on Society	
SO1	<p><i>Managing your impact on local communities</i> <i>Addressed</i></p> <p>As an advocacy organisation, TI-S reports that National Chapters engage directly with communities and are supported in this by the International Secretariat (e.g. by an Impact Matrix to monitor progress in achieving change in policies or activities). Project management feedback loops are in place, post-intervention evaluations are made available online and the organisation upholds high standards of human rights and child protection. Increased attempts are made to understand and verify impact – what works and what does not. The Panel looks forward to the finalisation of the TI-S Impact Monitoring Approach to systematically collect robust data and increase the understanding of successful approaches to the reduction of corruption. Moreover, it will be interesting to see how the evaluation's key outcomes will change TI-S's way of work.</p> <p>However, the question here is not only around <i>intended</i> consequences of TI's work i.e. the effectiveness of preventing corruption in a community, but also around the <i>unintended</i> consequences. The envisaged Whistleblower Policy (2014) is expected to close the current gap on dealing with potentially negative consequences for whistleblowers and the Panel looks forward to being informed how it works in practice. Is there also a process to systematically look for other unintended negative consequences of TI's work such as undermining local hiring</p>

	markets, negatively affecting existing power balances, not sufficiently respecting local values?
SO3	<p><i>Anti-corruption practices</i> <i>Fully addressed</i></p> <p>The answer provided describes sound procedures (TI-S Code of Conduct, Ethics Advisor, TI-S Ethics Council, TI-S Procurement Guidelines, Delegation of Authority Policy etc.) in place and processes of familiarising TI staff with anti-corruption practices (e.g. Ethics workshops). These measures shall ensure that corruption issues are mainstreamed in all aspects of TI-S' work. Evidence that they are well known in practice and have led to concrete instances of prevention or detection is welcome in the next report.</p> <p>It is positively noted that all processes are annually reviewed by the Board Audit Committee and one single policy for all anti-corruption principles should be adapted by 2015.</p>
SO4	<p><i>Actions taken in response of corruption incidents</i> <i>Fully addressed</i></p> <p>Transparency reports that no instance of fraud or corruption was found in 2013.</p>
VI. Ethical Fundraising	
PR6	<p><i>Ethical fundraising and marketing communications</i> <i>Fully addressed</i></p> <p>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. In light of TI-S' plans to diversify its donors base, the Panel would like to see specific criteria for the cooperation with the private sector.</p> <p>The organisation states that there was no formal donor complaint in 2013.</p>