International NGO Charter of Accountability Interim Framework Compliance Report of the year ended 30 June 2008

1. Profile of the Organisation

Name of the organisation	Plan International
Vision	Plan's vision is a world in which all children realise their full potential in societies that respect people's rights and dignity.
Mission	Plan aims to achieve lasting improvements in the quality of life of deprived children in developing countries, through a process that unites people across cultures and adds meaning and value to their lives, by:
	 enabling deprived children, their families and their communities to meet their basic needs and to increase their ability to participate in and benefit from their societies
	building relationships to increase understanding and unity among peoples of different cultures and countries
	promoting the rights and interests of the world's children.
Values	1. We are ethical, honest, transparent, and place a high value on integrity.
	2. We are accountable to all of our stakeholders in our communication, finances, performance measures, and results and strive for effectiveness, sustainability, and efficiency in everything we do. We adhere to recognised international standards.
	3. We create the conditions in our work, in our activities and in our organisation for personal empowerment, especially of children and the most marginalised.
	4. We respect child rights and human rights and we believe in everyone's innate and inalienable dignity as

	 human beings regardless of age, gender, race, colour, ethnicity, religion, class, nationality, national origin, marital status, sexual orientation or disability. 5. We acknowledge that we cannot solve problems of poverty alone but only through teamwork and mutual partnerships. 6. We strive for continuous learning and improvement. We listen to new ideas and encourage entrepreneurial activities, innovation, creativity, and change.
Primary brands	Plan Be a part of it.
Major programmes	Be a part of it. Programme domains include Growing-up healthy, learning, habitat, building relationships and livelihood
Core activities	Fundamental program principles include child centredness, learning, integration, gender equity, environmental sustainability, empowerment and sustainability, and co-operation.
Ownership and legal form	Plan International, Inc is a not-for-profit corporation registered in New York state with its principal (i.e. legal) office in Rhode Island USA. Plan Limited is a wholly owned subsidiary of Plan International, Inc incorporated in the UK to provide international headquarter services to Plan International, Inc. National Organisations are separate legal identities who are members of Plan International, Inc.
Operational structure Including roles	National Organisations are separate legal entities and are not the subject of this disclosure report. National Organisations are primarily responsible for raising funds from individual private donors through sponsorship, and from governments and corporations. They also perform a role in development education which is a

and responsibilities of global and national entities			
Location and address of global headquarters/ secretariat	Plan International Headquarters, Chobham House, Christchurch Way, Woking, Surrey GU21 6JG, United Kingdom		
Number of countries	Plan has 17 National Organisations and 49 program countries as follows:		
where the organisation operates Please attach	National Organisations are in the following countries: Australia, Belgium, Canada, Denmark, Finland, France, Germany, Ireland, Japan, Korea, Netherlands, Norway, Spain, Sweden, Switzerland, United Kingdom and United States of America.		
list of all countries where you operate	The program countries are Albania, Bangladesh, Benin, Bolivia, Brazil, Burkina Faso, Cambodia, Cameroon, China, Colombia, Dominican Republic, Ecuador, Egypt, El Salvador, Ethiopia, Ghana, Guatemala, Guinea, Guinea Bissau, Haiti, Honduras, India, Indonesia, Kenya, Laos, Liberia, Malawi, Mali, Mozambique, Nepal, Nicaragua, Niger, Pakistan, Paraguay, Peru, Philippines, Rwanda, Senegal, Sierra Leone, Sri Lanka, Sudan, Tanzania, Thailand, Timor Leste, Togo, Uganda, Vietnam, Zambia and Zimbabwe.		
Number of employees	Approximately 7,000 employees		

<u>Finance</u>	2005	2006	2007
	US\$000	US\$000	US\$000
Income from			
- Individual donations	373,191	400,934	452,832
- Foundations			
- Governments			
- International Organisations			
UN, EU, World Bank etc.			
- Business			
- Others - please specify			
Income is not collected centrally by Plan in accordance with the requested			
split	128,238	141,026	141,940
TOTAL INCOME	501,429	541,960	594,772
Total income by country - for countries/regions that make up 5			
percent or more of total income			
Please list countries and provide total income for each one			
Germany	81,521	93,570	99,720
Netherlands	100,021	92,820	91,180
Norway	40,316	46,514	48,003
Sweden	27,084	27,347	30,030
United Kingdom	58,086	68,644	71,054
Canada	47,242	58,343	68,593
United States	37,481	38,099	51,964
Japan	33,566	33,196	32,152
Other countries less than 5%	76,112	83,427	102,076
Total income	501,429	541,960	594,772
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Expenditure for	US\$000	US\$000	US\$000
- Programmes and activities directly addressing the			
organisation's purpose	386,888	484,048	462,861
- Fundraising	39,841	52,009	56,268
- Administration	49,770	51,128	52,641
- Others - please specify			
TOTAL EXPENDITURE	476,499	587,185	517,770
Total expenditure by country - for countries/regions that make up 5			
percent or more of total expenditure			
Please list countries and provide total expenditure for each one			
Field expenditure			
West Africa	82,995	87,929	95,933
Eastern and Southern Africa	79,367	105,065	88,017
Hope for African Children Initiative	5,080	6,222	3,882
Total Africa	167,442	199,216	187,832
Central and South America	92,013	112,032	103,110
Asia	86,850	128,403	115,052
Total field expenditure	346,305	439,651	405,994
National Organisation expenditure			
Europe	76,230	85,352	95,284
North America	19,733	23,839	30,894
Asia	11,962	14,894	12,216
Total National Organisations	107,925	124,085	138,394
Central organisation	22,269	23,449	27,382
Total expenditure	476,499	587,185	517,770

There are no countries within each category that individually comprise more			
than 5% of total expenditure.			
than 370 or total expenditure.			
Reserves	US\$000	US\$000	US\$000
The figure shown for reserves is the total of all fund balances. A new	198,458	149,567	174,913
reserves policy for Plan International Inc was implemented during 2007. The			
new reserves policy reflects an assessment of the current operational			
requirements of the organisation and in particular, the fund requirements			
needed to service grant expenditure prior to reimbursement by donors and			
for program continuity in the event of changes in monthly income. At 30			
June 2007 Plan International Inc reserves were lower than required by the			
new policy. It is intended to close the gap by increasing the proportion of			
grant funds received in advance of expenditure and budgeting to create small			
surpluses in each of the next few years. Reserves fell during 2006 reflecting			
a planned strategy to increase the organisation's capacity to deliver more			
programs faster and utilise available reserves. During the three years there			
were no other significant changes impacting reserves arising from location of			
operations, legal status or changes to global structure or governance.			
Significant changes during the reporting period regarding size,	There have been	no major changes	during the
structure, or ownership of both liquid and property reserves	period except ant	icipated growth an	d the decision to
including	open a new National Organisation in Hong Kong.		
- the location of operations, including opening of new offices,			
starting new major activities, and closings			
- legal status or ownership			
- global structure and governance			

2. Compliance with the principles of the INGO Accountability Charter

Respect for Universal Principles

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
1	Vision, mission, values and key documents position the organisation's work in the context of universal principles and relevant (e.g. UN) documents	The organisation's statutes and key programmatic documents.	o Partially	Whilst the fundamental ethos of the organisation's statutes and key programmatic documents are consistent with universal principles and rights, a revised Programme Framework is being developed which is more explicit on Plan's work in the context of the UN Convention on the Rights of the Child and other universal rights principles
2	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has been working in line with Universal Principles and that it has resolved any formal written complaints (formal written complaints: either in email or letter through mail or in person with contactable complainant's correspondence. All formal complaints	o Fully	

to be acknowledged within 1 month of receipt and complaints resolved within 6 months of receipt) it may have	
received concerning its alleged breach	
of these Principles.	

Independence

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
3	 Organisation receives less than 50% from one single source; Organisation is not owned/controlled by government, political party or business 	Documentation on - ownership and - income	o Fully	

Responsible Advocacy

	Best Practice	Evidence	Compliance	Action Plan if not/not fully
				in Compliance
4	The organisation has written policies ensuring that its public policy positions and advocacy are - in line with its mission	The organisation's written advocacy policies - describe the criteria or circumstances in which it will involve itself;	o Partially	A global advocacy strategy was adopted by the International Board in 2003. This is being reviewed to ensure alignment with best practices.

	accurate andconform withapplicable national law	 define the process for adopting and implementing its positions, involving partners, experts and other parties as appropriate; 		
		 contain due diligence provisions and sign off procedures ensuring legal compliance and avoiding unfair or irresponsible public criticism and undue harm to third parties. 		
5	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has not been in breach of its own advocacy policies and that it has resolved any formal written complaint it may have received concerning its alleged breach of these policies.	o Fully	

Effective Programmes

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
6	The organisation's programmes are conducted in genuine partnership with local communities.	The organisation's written programme strategy, evaluations of terminated and ongoing programmes and other relevant documents provide evidence that the organisation's programmes strengthen self-reliance, self-help and	o Fully	

		popular participation by empowering individuals and communities and		
	The second section of	building capacities of local structures.	E 11	
7	The organisation's	The organisation's written programme	o Fully	
	programmes aim for	strategy, evaluations of terminated		
	sustainable development.	and ongoing programmes and other		
		relevant documents provide evidence		
		that the organisation's programmes		
		- are based on the potential of local		
		resources to sustain the activity		
		- contribute to further strengthening		
		sustainability at local level and		
		- do not create or increase		
	The second section of	dependence on external support.	D. C.II	A
8	The organisation's	The organisation's written programme	o Partially	An environmental impact
	programmes are	strategy, evaluations of terminated		assessment tool is being
	appropriate for the local	and ongoing programmes and other		developed to assess the
	needs and conditions.	relevant documents provide evidence		environmental impact of
		that the organisation's programmes		Plan's programs
		- take relevant local conditions into		
		account, e.g. by involving local		
		stakeholders in all stages of		
		programme design and		
		implementation		
		- take appropriate care of relevant		
		local gender, diversity, cultural and		
		religious issues;		
		- avoid negative environmental		
		impact and, where possible, secure a positive impact.		
9	Funds raised for specific	The organisation's fundraising and	o Fully	
J	i unus raiseu iui specific	Title organisation s fundraising and	o Fully	

	programmes reach the people or cause in whose name they were raised.	donor information materials, donor communication, programme reports and relevant finance statements provide evidence that funds raised for a specific cause have been used to further that cause.		
10	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has not been in breach of its own programme policies and that it has resolved any formal written complaints it may have received concerning its alleged breach of these policies.	o Fully	

Non-Discrimination

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
11	The organisation promotes diversity, gender equity and balance, impartiality and non-discrimination in all activities, both internal and external.	 The organisation's written non-discrimination policy affirming its commitment to gender equity, to non-discrimination for sexual orientation, to ethnic and racial diversity, to the inclusion of people with disabilities at staff and board levels; The organization's plans and operations which fully reflect the non-discrimination policy; 	o Partially	Plan is an equal opportunity employer and non-discrimination principles are enshrined in all HR policies but there is no express non-discrimination policy currently in place in relation to all activities both internal and external.

		- The organisation's most recent personnel orientations, trainings and instructional material addressing non-discrimination.		
12	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has no knowledge of cases where it may have been in breach of its own non-discrimination policy and that it has resolved any formal written complaints it may have received concerning its alleged breach of these policies.	o Fully	

Transparency

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
13	The organisation is open, transparent and honest about its structures, mission, policies and activities.	 The organisation's reports which adhere to generally accepted standards of technical accuracy and honesty in presenting and interpreting data and research; The organisation complies with relevant governance, financial accounting and reporting requirements in the countries where it is based and operates. 	o Fully	
14	The organisation reports	The organisation's annual report	o Partially	The annual review and
	publicly at least once a	which contains:		financial reports are explicit

	year about its activities and achievements.	 Mission and values; Objectives and outcomes achieved in programme and advocacy; Environmental impact; Human rights impact; Governance structure and processes, and main office bearers; Main sources of funding from corporations, foundations, governments, and individuals; Financial performance; Compliance with the INGO Accountability Charter and Contact details. 		on all points except environmental impact and human rights impact. Work is underway to measure these impacts for future reports. The organisation does not currently analyse revenue by the sources mentioned.
15	The organisation's annual financial report will conform to relevant laws and practices and be audited by a qualified independent public accountant whose statement will accompany the report.	Independently audited annual accounts	o Fully	
16	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has no knowledge of any complaints concerning the accuracy or relevance of its reporting and that it has resolved any formal written complaints it may have received concerning its alleged	o Fully	

	breach of its reporting provisions.	

Good Governance

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
17	The organisation has a governing body which has responsibility for the oversight of all aspects of the organisation.	The organisation's bylaws, terms of reference for the governing body, and relevant policies and procedures allocate ultimate authority to the organisation's governing body. These documents also state that the governing body - selects, supervises and evaluates the chief executive, - oversees programme and budgetary matters - defines the overall strategy, consistent with the organisational mission, - verifies that resources are used efficiently and appropriately, - ensures that performance is measured, - secures financial integrity and	o Fully	
		makes sure that public trust is maintained.		

18	The work of the organisation's governing body takes place in a clearly defined framework of rules and procedures covering the appointment, responsibilities and terms of members of the governing body.	Documentation on the activities of the governing body shows that all the above tasks have been undertaken thoroughly and successfully. The organisation's bylaws, terms of reference for the governing body, and relevant policies and procedures - identify required qualifications and expertise of the members of the governing body and the mix of skills across the group - specify the frequency of meetings of the governing body (at least two	o Partially	The best practice criteria is fulfilled except that: - the required qualifications, expertise and skill-sets of the Board are determined by the Nominating Committee of the Members' Assembly in accordance
		meetings per year), - specify adequate attendance by directors (at least a majority of directors on average), and - lay down voting requirements - provide a process for evaluating the governance body's own performance. Records of the meetings provide evidence that meetings were held and which decisions were taken. A regular general meeting takes place with authority to appoint and replace members of the governing body.		with its own criteria. - the Bylaws of Plan International, Inc. do not "specify adequate attendance by directors" but attendance of directors was at 85% during the reporting year
19	The organisation tries to prevent and, if they occur,	The organisation's bylaws, terms of reference for the governing body, and	o Fully	

	actively manages conflicts of interest.	relevant policies and procedures require that members of the governing body and employees: - disclose any affiliation they have with an actual or potential supplier of goods and services, recipient of grant funds, or organisation with		
		 competing or conflicting objectives; absent themselves from discussion and abstain from voting or otherwise participating in a decision on any issue in which there is a conflict of interest; and 		
		refuse large or otherwise inappropriate gifts for personal use.		
20	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has no knowledge of any irregularities in its governance system and that it has resolved any formal written complaints it may have received concerning its governance system or members of its governing body.	o Fully	

Ethical Fundraising

Plan International's compliance with each of the ethical fundraising criteria must be understood in the context of the relationship between Plan International and the 17 fundraising entities (National Organisations – NOs) which are part of the Plan family.

It is important to understand that Plan International and the NOs are all separate legal entities. They are bound together by a partnership agreement that creates a virtual global organisation, more like a network, than a single entity. The membership agreement and Bylaws of the Corporation weigh a careful balance between respecting the autonomy of individual offices and holding all offices together under a common purpose and practice. The membership agreement is primarily a statement of affiliation rather than a control document. While it does sets out a few core rules it is not designed to be a comprehensive set of policies and procedures governing the whole organisation.

The separate NO legal entities each operate in their own distinct accountability and compliance environments. They are individually responsible for local policy and fundraising compliance. Most, if not all, fully comply with the ethical fundraising criteria outlined in the INGO Accountability Chart. In a number of cases the NOs would exceed the requirements due to either local NO policies, local legislation, or NGO self regulation that exists within their market. In some emerging fundraising markets where legislation and self regulation are nascent then compliance may be partial. Due to the structure of Plan and the variation across markets the overall response Plan International can give on behalf of the network is partial. Nevertheless in most established markets individual NOs meet or exceed the standard.

Over the years the global organisation has collectively adopted various policies that must be applied in all parts of the organisation. Due to the nature of Plan this is a gradual process of harmonisation rather than central imposition of legal rules. At this stage these policies are not designed to impose a comprehensive compliance regime on NOs but rather to deal with specific risks that have global implications. This approach balances the freedom and autonomy of NOs to deal locally with their responsibilities to supporters against the need of the global organisation to manage international reputational risks. Examples of these global policies are as follows:

1. Corporate Partnership Guidelines

It is recognised that many Corporations are global and that a partnership with Plan in one country has implications for Plan's reputation in other countries. Consequently global policy and guidelines have been established for assessing the ethical suitability of corporate partnerships.

2. Grant Acquisition Policy and Procedures

It is recognised that the acceptance of large grants from national government, multilateral institutions and corporations have significant institutional implications. As such policy and guidelines have been developed to govern the size and terms of these grants.

3. Child Protection Policy

It is recognised that the only reason Plan exists is for the protection and development of children. Consequently very strong child protection policy and guidelines have been developed. These have implications for fundraising and always take precedence.

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
21	In accepting funds the organisation ensures that it complies with its own ethical standards.	The organisation's written policy for accepting or refusing certain donations and subsidies clearly states which sources of funding are not acceptable to the organisation for ethical reasons.	o Partially	Plan's corporate partnership guidelines ensure that ethical standards are met. However, the guidelines do not extend to other types of donors apart from corporations. A review of non-corporate partnerships is under consideration with the goal of producing further guidelines. Plan's grants acquisition policy and procedures

				control the mechanisms for accepting grant funding.
22	The organisation respects the rights and wishes of donors.	 The organisation's written policy confirms donors' rights to be informed about causes for which the organisation is fundraising; to be informed about how their donation is being used; to have their names deleted from mailing lists; to be informed of the status and authority of fundraisers and to anonymity except in cases where the size of their donation is such that it might be relevant to the organisation's independence; and that donations accepted for a specific purpose, are used for that purpose. The organisation's fundraising and donor information materials and donor communication are complying with donors' rights. 	o Partially	Whilst the organisation has clear obligations to respect the rights and wishes of donors generally which are set out in policy and there are legal obligations of data protection which the organisation must comply with in most jurisdictions, there is no organisation-wide data retention policy or requirement to inform donors of the status and authority of fundraisers. There is no explicit policy on anonymity of donors generally except that data protection laws must be complied with.
23	In raising funds, the organisation accurately describes its activities and needs. It uses donations in line with the information	The organisation's fundraising materials and communication - show how the donation will further the organisation's mission; - neither minimise nor overstate the	o Partially	The organisation's donor information materials and communication provide detailed documentation on the use of donations. The

	and assurances given to the donor.	size or urgency of the challenge the organisation wants to address; do not contain any material omissions or exaggerations of facts, misleading photographs, nor create a false impression or misunderstanding;		organisation is transparent on the use of donor funds and is often required by institutional donors to audit and report on the use and expenditure of donations.
		show how organisation will handle any shortfall or excess of income raised for a specific project		In general, Plan complies with this requirement fully. However, no formal policy exists which requires the
		The organisation's donor information materials and communication provide detailed documentation on the use of donations.		organisation to show how any shortfall or excess of income raised for a specific project is dealt with.
		Follow-up with donors about clarity and quality of materials sent to them shows that the organisation's intended message is accurately getting through.		
24	The organisation records and publishes details of all major institutional gifts and gifts-in-kind clearly describing the valuation and auditing methods used.	 The organisation's written gifts-in-kind policy states under which conditions and for which purposes gifts-in-kind are being accepted; provides clear parameters for valuation and auditing of gifts-in- 	o Not at all	A review of the corporate partnership guidelines is being considered which would include a review of institutional gifts and giftsin-kind.
		kind. The organisation's documentation of all major institutional gifts and gifts-in-		Funds are received from National Organisations who may have their own policies and legal compliance

		kind is complete and up-to-date.		requirements in relation to institutional gifts and gifts-in-kind.
25	The organisation ensures that donations sought indirectly, such as through third parties, are solicited and received in full conformity with its own practices.	The organisation's policy for the use of agents or other third parties for fundraising purposes states - that contracts between the organisation and a third party will be in writing and - that these contracts will oblige the third party to comply fully with the organisation's fundraising policy and ethical standards.	o Not applicable	Each of Plan's National Organisations adhere to fundraising standards required as per the laws in their countries and aim to exceed minimum requirements regarding best practices in fundraising. However, Plan International does not have a policy or formal procedure for this as its primary function is in the delivery of programmes not fund-raising.
26	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has no knowledge of any significant breaches of its fundraising and related policies and that it has resolved any formal written complaints it may have received concerning its own or its agents' fundraising materials and practice.	o Fully	

Professional Management

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
27	The organisation's management is professional and effective and the organisation's policies and procedures seek to promote excellence in all respects.	The organisation's written management terms and conditions, policies and procedures contain - job specifications and personnel profiles for the CEO and Senior Management Team positions - annual work plans for the CEO and the Senior Management Team directly referring to the organisation's strategy - an appraisal system with the CEO being appraised by the governing body. The organisation's strategy and key policies lay down clear objectives and criteria defining excellence.	o Partially	Annual work planning processes are not formally codified in policy and procedures. A new Strategic Review document has been approved by the Members' Assembly in June 2008 and the development of a business implementation plan is currently under construction.
28	Financial management and control ensure that all funds are effectively used and minimise the risk of funds being misused.	The organisation operates according to a budget approved by its governing body. The organisation exercises adequate internal controls over disbursements to avoid unauthorised payments, prohibiting any un-auditable transactions or loans to members of its governing body or staff.	o Fully	

		The organisation's annual, audited financial statements - are produced by a certified public accountant; - presented timely (normally not later than 6 months after the end of the financial year) and in line with the organisation's written finance policy; - comply with nationally accepted accounting standards and legal requirements.		
29	The organisation has evaluation procedures for its governing body, staff, programmes and projects and conducts monitoring and evaluation on the basis of mutual accountability.	The organisation incorporates appropriate monitoring and evaluation practices in all relevant policies and systems establishing mutual accountability as part of its culture. The organisation conducts regular and deliberate evaluative activities to examine progress towards its goals and mission; and applies in its budget and work plans adequate financial and human resources for monitoring and evaluation.	o Fully	
30	The organisation ensures that its partners meet the highest standards of	In its policies guiding the selection of and cooperation with partners the organisation	o Partially	Guidance on the selection and cooperation with partners is under

	probity and accountability.	 identifies adequate criteria for the selection of effective, legitimate and reliable partners; takes adequate provisions to exclude links with organisations or individuals involved in illegal or unethical practice. 		In relation to funding partners, this is predominantly carried out by Plan's National Organisations, please refer to Ethical fundraising section.
31	The organisation recognises the crucial role the quality and dedication of its staff play in the success of its work and is committed to investing in human resource development.	 The organisation's written human resources policies and procedures conform fully with relevant international and national labour regulations; provide for remuneration and benefits levels which strike a balance between public expectations of not-for-profit organisations and the need to attract and retain the staff the organisation needs to fulfil its mission; apply the best voluntary sector practices in terms of employee and volunteer rights and health and safety at work. include procedures for evaluating the performance of all staff on a regular basis. 	o Partially	The best practices criteria is fully met except that a review of health and safety practices for employees and volunteers is being carried out to ensure compliance with best voluntary sector practices.
32	The organisation takes all	The organisation's relevant policies	o Fully	

	required provisions to exclude corruption and bribery from its work.	 specifically prohibit acts of bribery or corruption by staff or other persons working for, or on behalf of, the organisation; identify appropriate steps to be undertaken in cases of suspected bribery or corruption. 		
33	The organisation respects sexual integrity in all its programmes and activities, and prohibits gender harassment, sexual exploitation and discrimination.	The organisation's relevant policies contain appropriate provisions - preventing sexual exploitation, abuse; - ensuring gender equality; - preventing discrimination in all its forms; - fostering ethnic and racial diversity.	o Fully	
34	The organisation provides internal feed-back mechanisms making sure that the organisation consistently stays within its ethical and legal framework and follows its mission.	The organisation's written whistle-blowing policy enables and encourages staff to draw management's attention to activities that may not comply with the law or the organisation's mission and commitments, including the provisions of the INGO Accountability Charter.	o Fully	
35	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has no knowledge of any significant breaches of its management policies or related	o Fully	

policies and procedures and that it has resolved any formal written complaints it may have received	
concerning its management provisions and practice.	

Dated 15th September 2008

Paul Arlman Chair of the International Board and Members' Assembly Thomas J Miller Chief Executive Officer