Accountable Now
GLOBAL STANDARDS LOCAL TRUST

**Restless Development
Independent Review Panel Feedback**
Accountability Report 2016-2017
Review Round September 2018

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Feedback from the Independent Review Panel
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01 October 2018

Dear Perry Maddox,

Thank you for submitting your accountability report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to continuously strengthen accountability to communities, local partners, supporters, staff, donors, or other key constituencies. Our key focus is on accountability to those you serve. It is against this background that we critically discussed your report and came to the individual assessment below.

Restless Development's second accountability report again demonstrates a strong **institutional commitment** to dynamic accountability, with meaningful engagement of the organisation's key stakeholders (young people) evident across various aspects of programmes, strategy, and operations. As new CEO Perry Maddox explained in his opening statement, Restless will be working to test and prove the case for a new type of development agency grounded in a strategic commitment to accountability and building on the agency and leadership of people.

The report includes links to relevant policies and other documents in many places, and most of these are publicly available on Restless' website, which the Panel has previously identified as a **good practice**. Another good practice in this year's report is the way Restless coordinates with other actors (NGO6).

The panel appreciates the fact that a number of areas have been addressed since the last report.

The panel welcomes the inclusion of evidence from the staff survey Several illustrative case studies were provided to support descriptions of policies and processes, which the Panel appreciates. However, some more examples, particularly in relation to stakeholder engagement and feedback, would be appreciated in the next report. The Panel would also be interested in seeing more of Restless' annual Agency Survey results throughout different sections of the report – as provided under the section on environmental impact.

Areas for improvement include more information on stakeholder identification and prioritisation (4.15) and public reporting of incidents and complaints (NGO2, SO4).

The Panel appreciates that Restless has been focusing on faster turnaround times for their accountability report, in line with changes Accountable Now has been making to streamline and simplify the reporting process.

Finally, the Panel commends Restless Development's strong promotion of dynamic

accountability – through a [dedicated page](#) on the website as well as a section on [transparency](#) (in addition to enacting dynamic accountability concepts through their day-to-day work). Accountable Now membership is highlighted on both pages. In future reports, the Panel looks forward to learning more about how successful Restless has been in promoting dynamic accountability across the sector, and seeing examples of how it is applied in practice.

Our intention is that this feedback letter, and any response you may wish to provide, is made publicly available on the Accountable Now website along with your report – as it is the case with all previously reviewed reports. 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 any comments or amendments by 29 October 2018. If you have any other feedback or comments on our work, please share them with us by sending them to the Accountable Now Secretariat.

Yours sincerely,

Louise James   Simon Lawry-White   Charlie Martial Ngounou

Restless Development's Accountability Report 2016-2017
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	PROFILE DISCLOSURES
	I. Strategy and Analysis
1.1	***Statement from the most senior decision-maker*** *Fully addressed* Restless Development's new CEO Perry Maddox opens the report with a strong statement highlighting the need for accountability – and demonstrating accountability through actions rather than words – in the face of several challenges to the development sector. Dynamic accountability is one of four pillars of Restless' new Agency Plan, which aims to transform the way the organisation achieves change. The Agency Plan highlights a commitment to meaningfully involving stakeholders in Restless' work and there is a strong focus on opening up about challenges, taking risks, challenging themselves as an organisation, and learning from failures. Restless also intends to share its approaches and lessons learned across the sector. Restless hopes to test and prove the case for a new type of development agency grounded in a strategic commitment to accountability and building on the agency and leadership of people rather than INGOs. The Panel looks forward to following Restless' efforts in this area.
	II. Organisational Profile
2.1 – 2.7	***Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience*** *Fully addressed*
2.8	***Scale of organisation*** *Fully addressed* Most of the information requested is found in the Financial Report, and information on the number of staff and volunteers provided under Section 8 of the report, on Human Resources Management.

2.9 – 2.10	***Significant changes to previous reporting / Awards received***
	Fully addressed
	No significant changes were reported for 2016-2017,
III. Report Parameters	
3.1 – 3.4	***Reporting period / Date of most recent report / Reporting cycle / Contact person***
	Fully addressed
3.5	***Reporting process***
	Fully addressed
	The response outlines how the Independent Review Panel's feedback is presented to the Senior Leadership Team and is used to improve systems and processes.
	While the role of different stakeholders (e.g. staff from various teams, offices, departments) in the compilation of the report was not specified in this report, Restless' previous report (pg. 3) outlined a participatory and inclusive reporting process, with input from across the agency – the Panel assumes this process was adopted again this year. Reports are published online and proactively shared with staff and trustees for further engagement.
	Restless has been working on streamlining the way it gathers information and compiles the report in order to submit it in timelier manner. It is stated that the 2018/19 financial year will be used to develop a new vision for the accountability report, to align with Accountable Now's new reporting framework, and to revise the annual reporting process. The Panel appreciates this forward-looking approach.
3.6 – 3.11	***Report boundary / Specific limitations / Basis for reporting / Significant changes in reporting parameters***
	Fully addressed
3.12	***Reference Table***
	Addressed
	A very helpful reference table was provided, with relevant page numbers within the report for each indicator. Where references to other organisational reports were made (e.g. the financial report), page numbers would be appreciated.

IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	**_Governance structure_** _Fully addressed_ A clear overview of Restless Development's governance structure, levels of authority, and risk management/compliance is provided. There is a Global Board of Trustees as well as National Boards for each of Restless' 10 Hubs. All boards include at least two young people and are made up of people from diverse backgrounds. Four committees allow Trustees to engage with leadership teams and provide oversight to strategy, operations and risk.
4.2	**_Division of power between the governance body and management_** _Fully addressed_ The working relationship between Trustees, the Chief Executive and Senior Leadership Team is explained. The Chair of Trustees manages the CEO, with regular meetings to coordinate between oversight and leadership functions. The CEO's performance is reviewed annually through a 360-degree feedback mechanism with input from across the organisation and other stakeholders.
4.3	**_Independence of Board Directors_** _Addressed_ A list of Trustees is available on the Charity Commission's [website](). There are currently 12 Trustees and all are independent, working on a voluntary basis.
4.4	**_Feedback from internal stakeholders_** _Addressed_ The report outlines the opportunities for senior staff to engage with Trustees. While there are currently no systematic mechanisms in place for other staff (besides senior management) to provide feedback to the board, Restless will review this in 2018 and develop an approach to ensure meaningful engagement. The Panel has highlighted World YWCA's approach to this as a good practice (see page 12 of their most recent [report]().

4.5	**Compensation for members of highest governance body**
	Fully addressed
	Trustees serve on a voluntary basis. The salaries of management and executives (and all other staff) are determined in line with a Global Salary Scale which is published on Restless' website.
	The scale is calculated to ensure staff in comparable positions receive wages (and hold job titles) consistent with peers in other offices around the world. Individual salaries are set on a net basis so that pay is comparable regardless of nationality, tax requirements, and cost of living. The Panel has previously identified this as a good practice.
4.6	**Managing conflicts of interest**
	Fully addressed
	Trustees and senior management complete an annual declaration of interests, which is also published online.
4.10	**Process to support highest governance body's own performance**
	Fully addressed
	Trustees are recruited in line with the organisation's recruitment policy (available in the Employee Handbook) in an open and interactive process. Trustees are appointed for a four year term with the possibility of extending for a second term.
	Performance of the board is evaluated in an annual internal review, and in 2017/18 an external review will be undertaken by a consultant.
4.12	**Social charters, principles or other initiatives to which the organisation subscribes**
	Not addressed
	Whilst it was stated that this was not applicable to Restless Development in the reporting reference table, membership of organisations such as International Aid Transparency Initiative should be mentioned here. In the new reporting framework, this will be covered more broadly under question G1.
4.14-15	**List of stakeholders / Basis for identification of stakeholders**
	Partially addressed
	Restless Development's main stakeholder group is young people in the countries in which Restless operates. However, as mentioned in the

previous feedback letter, information on how Restless identifies and prioritises these young people is missing. Does Restless define youth based on a specific age range? Are youth prioritised based on gender or particular skills? How were the countries in which Restless operates chosen?

Some helpful information is provided on page 21 of the report about how Restless ensures they reach the most marginalised.

Further stakeholders include partners from civil society, government institutions, the private sector, and bilateral and multilateral partners.

PERFORMANCE INDICATORS

I. Programme Effectiveness

NGO1	**Involvement of affected stakeholder groups**
	Fully Addressed
	Restless Development's youth leadership model is outlined in the report, with commitments to hire young people to lead the organisation's work, partner with youth-led organisations around the world, engage young people in programme design, implementation and evaluation, and ensure youth representation on the international and national boards. The emphasis is on young people as changemakers rather than "affected stakeholders".
	Several examples are provided of how Restless has partnered with, advised, and assisted other organisations and initiatives in implementing youth engagement into their work,
NGO2	**Mechanisms for feedback and complaints**
	Addressed
	The report points to Restless' whistleblowing policy, which allows both internal and external stakeholders to raise concerns via a dedicated email address. Complaints can also be submitted directly to "relevant contacts within the agency". The general procedure for dealing with complaints under the policy is outlined, though more details about timelines and possible escalation steps are not included.
	Several formal and informal mechanisms for stakeholders to provide feedback on programmes are also listed, and it is mentioned that in

	2018/19 Restless will look into strengthening communities' confidence in and use of feedback mechanisms. An example of complaints received by volunteers in the UK is provided, along with changes made to the volunteer programme in response. As for other incidents, the report states (on pg 36) that Restless Development is currently reviewing whether to publish incident numbers online, or whether this could cause more harm than good, as reporting would not include details and would be at a superficial level. The number and nature of incidents are currently shared with the International Board, the People Board Committee, and all global Directors. Relevant incidents are also reported to donors and the Charity Commission. During 2017/18, Restless will review and update its systems for incident recording, management and communication. The Panel believes there is a genuine commitment to improve in this area and strike the correct balance between meaningful reporting, transparency, and protecting individuals involved in incidents. However, it suggests that an overview of the number, nature and location of complaints could be provided – without details about individual incidents, and with notes about the number of complaints found to be unfounded if that is a concern – without harming individuals informed or the general image of the organisation.
NGO3	***Programme monitoring, evaluation and learning*** *Addressed* Restless Development's monitoring, evaluation and learning (MEL) systems use creative and youth-friendly methods such as apps and youth and gender sensitive tools to engage key stakeholders. Young people are actively engaged in the MEL process, and an example was provided of how this happened in Nepal in the reporting period. It would have been interesting to learn how the feedback in this case was used. All programmes share impact and progress analyses (available online). It is stated that evaluations feed into future planning and decision-making – both about programmes and operations. An annual review is conducted with stakeholders to learn about strengths and areas for improvement in Restless' work, and findings are presented to Hub Leadership Teams as well as the International Senior Leadership Team. Can Restless provide in its next report examples of how it has reacted to feedback from stakeholders? In the new reporting framework we are also keen to see more evidence of how learning processes influence programmes and advocacy.

NGO4	**Gender and diversity**
	Fully addressed
	Restless Development's approach to engage and involve a diverse range of stakeholders is outlined, including reaching out to those outside of formal education and who may be illiterate (in addition to the aim to engage young people regardless of age, sexuality, gender, ethnicity and background). It is stated that "reasonable adjustments" are made to ensure a diverse range of stakeholders inform and lead programmes – some examples would provide a better idea of what this entails in practice.
	In 2016/17 all programmes were aligned to Restless' new strategy and Programme Principles, which include principles relating to gender – such as assessing programmes through a non-binary lens and ensuring equal participation of women and men. How will performance against the principles be monitored to see whether equal participation is ensured?
NGO5	**Advocacy positions and public awareness campaigns**
	Addressed
	Advocacy positions are formulated based on data collected from communities by locally based youth Accountability Advocates. This allows the building of trust and feedback loops within the community. It is stated that there are a number of examples of advocacy positions rooted in first-hand data collection, but none were provided in the report – an example would be welcome in the next report.
	Global advocacy positions, recommendations and messaging are informed by national work in Restless' Hubs, youth-led networks, and youth consultations. Links are provided to examples. Are there examples of how corrective action is taken in campaigns, when needed?
NGO6	**Coordination with other actors**
	Addressed
	Restless Development is committed to capacity building for its partners at various levels, and supports increased Southern CSO engagement in advocacy and influencing. Partnerships are based on common visions and goals, increasing impact, and comparative advantage. There is a focus on working through existing structures, which leads to sustainable outcomes.

	A key part of Restless' efforts is convening; bringing youth voices to different fora and training young people on advocacy. Restless also advises institutions on how to improve engagement with youth, and provides training to organisations on how to provide youth-friendly services. Helpful examples are provided of various partnerships Restless facilitated in the reporting period, with youth advocates, youth-led development agencies, government, and the private sector at the local, national, and global levels. The Panel repeats its question from its previous feedback letter about how Restless ensures that its partners also meet high standards of accountability. Overall, Restless' approach to coordinating with other actors is seen as a **good practice**.
II. Financial Management	
NGO7	***Resource allocation*** *Fully Addressed* Restless publishes its audited financial accounts on their website as well as that of the UK Charity Commission. Financial data is also provided to the International Aid Transparency Initiative. Restless applies the DFID Value for Money model to all funding, and the Panel appreciates the examples of how the approach is implemented and progress made over the reporting period are provided. The Panel cautions against using the term "internal audit" for exercises other than those undertaken by audit specialists, and suggests alternative terms such as "programme review" or "peer review" (if conducted by internal staff who are not auditors) be used. The report also outlines the measures in place to ensure effectiveness of resource allocation and reduce the risk of funds being misused.
NGO8	***Sources of Funding*** *Fully addressed*

III. Environmental Management	
EN16, EN18	**_Greenhouse gas emissions of operations / Initiatives to reduce emissions of operations_** _Addressed_ An overview of carbon emissions is provided (it is assumed this is just from the International Office, and it is stated that Restless will continue working with its Hubs to include their carbon data in reporting). Emissions decreased compared to the previous reporting period and the main contributor remains flights (81.9% of emissions). It is explained that flights are a key part of the International Citizen Service programme, and fluctuations in participants will continue to influence increases or decreases in emissions. The report states that minimal progress was made in exploring greener programming or carbon offsetting, but did not mention whether these will be explored over the coming year. The Panel hopes to see more information on targets and initiatives for reduction or mitigation of carbon emissions in the next report.
EN26	**_Initiatives to mitigate environmental impact of activities and services_** _Addressed_ Restless Development's programmes are required to align with their Environmental Principles (Section 23 of the Employee Handbook) and are planned to reduce negative environmental impacts. There are environmental impact assessments in the planning and design stages of all programmes, and adjustments are made as needed to improve. It is stated that the process of developing tools, guides, processes and frameworks to implement the environmental principles has not yet begun, but that these will be rolled out before the end of the 2019/20 financial year. It was very helpful to understand the views of the staff via the survey and we hope the new processes will contribute to more positive responses from staff in the next survey, about how they and the organisation understand and mitigate environmental impact. The Panel looks forward to an update in the next report. The Panel commends the inclusion of sustainability and environmental protection into its financing policies and decisions, including procurement, fundraising and banking. Examples of how Restless has raised awareness about climate change and supported initiatives to reduce environmental impact are also noted positively.

	In the next report, the Panel would like to see more information about the main environmental impacts of Restless' activities (apart from flights) and whether any initiatives are in place to mitigate negative environmental impacts, aside from carbon emissions (e.g. reducing use of water and paper, energy efficient appliances, etc.)
IV. Human Resource Management	
LA1	**Size and composition of workforce** *Addressed* The number of staff and volunteers was provided, but this was not broken down by geographical region, responsibility level, etc. The Panel repeats its recommendation to provide a table with these figures, and provide data from previous years for comparison. For example, it appears that the number of volunteers more than halved since the submission of Restless' previous report. Given the importance of volunteers in Restless' work (and the Value for Money approach), was this a planned reduction? As a reminder, the Panel can suggest reference to Educo's approach (pg. 35-46) as an example.
EC7	**Procedure for local hiring** *Addressed* A global recruitment and induction policy guides recruitment in all Restless Development Hubs and offices. Restless states that they aim to have a majority of staff native to where particular operations are based. In the reporting period 94% of staff were native to the country they were working in - it would also be interesting to know the percentage at senior management level. A Global Salary Scale ensures that take-home pay is in line with local cost of living and comparable across Restless' country hubs. This ensures Restless does not undermine local CSOs' ability to recruit staff.
LA10, LA12	**Workforce training / Global talent management** *Addressed* Restless Development's global performance and development guidelines guide workforce training and aim to enhance existing staff capacities as well as the building of new skills. The different development/training opportunities offered by Restless are listed – are there ways to ensure these opportunities are taken up if not proactively pursued by staff?

	The Panel notes positively the introduction of new non-salary benefits which ensure all staff have access to global benefits as well as country and context-specific benefits. A review of medical insurance is also being undertaken with the aim of providing a base level of medical support to all staff.
	Restless' annual staff satisfaction survey reveals solid increases in positive responses in comparison to the previous year (it is noted that 67% of staff completed the survey). 76% of respondents provided positive responses to questions about performance management and professional development and 83% felt they were valued by the organisation. The Panel notes positively that the survey is taking place, and would be interested in knowing how the lower scoring areas are being addressed.
LA13	**_Diversity of workforce and governance bodies_** _Addressed_ Restless' recruitment and equal opportunities policies (available in the Employee Handbook, section 5) mention a comprehensive range of factors which should not affect treatment of staff. There there are specific policy statements for gender, age and nationality. Restless aims to have a 50-50 balance between male and female staff, a majority of staff being local to the country, and 51% of staff being under 28 years of age. Current percentages are presented, with slight improvements from the previous reporting period, though the gender and age targets have not yet been achieved. What specific actions, if any, were taken or are being planned in order to move towards these targets? The Panel would also like to see a breakdown of these figures at the senior management level.
NGO9	**_Mechanisms to raise grievances_** _Fully addressed_ Restless Development's Employee Handbook includes a section on dignity at work (Section 6) which covers relationships, sexual and other forms of harassment, bullying and victimisation. There are also sections on working hours and leave (Section 9), HIV and AIDS (Section 13), and a detailed grievance procedure which allows for complaints to be escalated as appropriate (Section 11). There is also a separate whistleblowing policy and Global Safeguarding Policy (including a code of conduct) One formal grievance was raised in 2016/17 and was dealt with in line with the process outlined in the employee handbook.

V. Responsible Management of Impacts on Society	
SO1	**_Managing your impact on local communities_** _Addressed_ A set of Impact Principles guide how Restless ensures impact in its programming – including clear and measurable change objectives and the sharing of learnings on what works amongst the different programmes. Sustainability is also covered in Restless' Programme Principles, and all programmes have implementation plans and exit strategies. Restless' projects and programmes were aligned to the new Impact and Programme Principles in 2016/17. The Global Safeguarding Policy guides child protection. The Panel repeats its previous question about what feedback has been received from communities in which programmes are running, and how this feedback has been responded to. The Panel would also like to know how Restless strengthens the "critical friend relationship between young citizens and their governments.
SO3	**_Anti-corruption practices_** _Fully addressed_ Restless Development has a comprehensive risk management system, which begins with a robust recruitment process and continues with a zero-tolerance approach to fraud and bribery, laid out in staff policies. The report details the variety of measures for fraud prevention and risk management. Staff participate in annual trainings on these issues, national Hubs undergo regular and multi-tiered risk assessment, there are policies to prevent and report fraud, and internal audits ensure policies and processes are in place and in use. In 2016/17 Restless rolled out a new way of identifying and managing risk, including emerging risks, and updated the way trustees are briefed on risk in quarterly updates. Is there evidence that these systems work well in practice?
SO4	**_Actions taken in response to corruption incidents_** _Partially addressed_ See comments under NGO2 above about Restless' current considerations about whether to publish information about complaints/incidents externally. As for how incidents of corruption are communicated internally, the Employee Handbook (Section 16.5.2): "the International Finance Director will maintain a record of all incidents across the organisation. A report will be shared quarterly with the F&A Committee. Material

	incidents will be shared with the wider Board… Any confirmed instances of fraud should be reported to the relevant donor… In some instances there may be a requirement to report the incident to regulatory bodies".
VI. Ethical Fundraising	
PR6	***Ethical fundraising and marketing communications*** *Fully addressed* A number of guidelines and policies guide fundraising and communications activities. The Panel notes positively the approach to consent forms – rather than just obtaining a signature, the aim is to explain the purpose of collecting the participant's story and how it may be used. Staff and volunteers are trained on how to capture and share stories sensitively, and a story safety guide was developed in 2016/17, with sections on protection, control, decision making and publicity. An Ethical Funding Policy guides the acceptance or refusal of funding from private sector organisations, and all major and institutional donors are published, as are corporate partners. The Panel notes positively that a more comprehensive fundraising complaints procedure was developed in 2017, and if complainants are not satisfied with Restless' response, they are directed to raise a complaint with the UK's Fundraising Regulator. No fundraising related complaints were received in the reporting period.