

GLOBAL STANDARDS LOCAL TRUST



Terre des Hommes International Federation Independent Review Panel Feedback

Accountability Report 2015 Review Round April 2017

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Terre des Hommes International Federation Feedback from the Independent Review Panel

Review Round April 2017

11 May 2017

Dear Ignacio Packer,

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. Before we share this with you, however, we want to highlight a few issues of concern that we found throughout most of the nine reports assessed in the last review round.

Closing the feedback loop with stakeholders (NGO2, NGO9)

A <u>recent study</u> on 40 international civil society organisations' (CSOs') accountability practices – conducted by the *direct impact group* on behalf of Accountable Now – revealed that only three out of these 40 CSOs responded with an appropriate answer to a complaint test within three weeks.

This is alarming. All Members of Accountable Now should have a fully functioning feedback mechanisms in place. However, when checking your reports we found a consistent lack of reporting filed complaints per type, quantity, and region as well as a total lack of information on how they were resolved. We believe this is not an acceptable level of accountability. CSOs should not only have a mechanism in place but should first be capturing complaints with the appropriate level of detail and then monitoring their resolution and agreeing what actions need to be taken to ensure the same issues do not arise.

<u>Feedback Labs</u>, with whom Accountable Now collaborated on the <u>People-Powered Accountability project</u>, also serve as a valuable source of information on how to close feedback loops.



Collaboration with partners, communities and

networks (NGO6, EC7 & SO1)

As part of the <u>10 Accountability Commitments</u>, Accountable Now Members commit to working in genuine partnership with local communities and partners. With increased globalisation of information, more empowered citizens engage and civic space is challenged, it becomes ever more important to help local communities and partners to thrive. However, we found that coordination with local communities is still an overall weakness area among the Accountability Reports we received. Some "common" ICSO practices can have intended or unintended consequences on local communities. We would thus like to particularly highlight a lack of contributions to building local capacity and resources. Do you take into account local market conditions and think about working alongside local organisations building their capacity? We suggest that ICSOs should start to consider their impact on the sustainability and independence of local civil society in all their work (such as planning, budgeting, economic impact, etc.).

Adding to what people do to improve their lives (NGO3)

To state the obvious, impact measurement is important. However, many evaluations mentioned in received Accountability Reports focus on collecting relatively large amounts of data on people reached, however, this does not tell us much about the improvement in their lives. Moreover, we should critically ask ourselves: What is the ICSO's credit in this improvement and what positive impact is actually due to the people and beneficiaries themselves?

While we are of course aware that resources are limited, there is clearly no substitute for a robust and honest impact evaluation of our programmes and activities.

Organisation-specific feedback to Terre des Hommes International Federation:

Terre des Hommes International Federation's (TDHIF's) second accountability report is quite comprehensive. It has slightly improved from the first submitted report.

TDHIF has so far only joined for the International Secretariat which consists of nine staff members in Geneva and Brussels. It is highly recommended by the Panel that TDHIF moves towards Accountable Now Membership and reporting for the whole federation on a specific and agreed-upon timeline. This would



support the organisation's new Strategic Plan around sharing "expertise and knowledge to improve complementarity and accountability".

In terms of **institutional commitment** to accountability, the report shows that the organisation uses accountability and this report as a learning exercise for more transparency and organisational development. While TDHIF followed up on some Panel recommendations from the previous year (e.g. EN16), other requests or advice seem to be ignored (e.g. 3.8, EN16, SO1, PR6) or barely acted on (e.g. adopting anti-corruption practices). The organisation prominently features Membership with Accountable Now – including publishing Accountable Now's new logo and link to their website – on <u>their website on standards</u>. This is highly appreciated in order for stakeholders to know what the organisation has committed to. Additional information provided on 3.13 on external assurance for this report is not mandatory for reporting and thus not assessed by the Panel.

Relevant **evidence** that policies or procedures work well in practice is provided in some areas but should be further improved in others in future reports (e.g. seeking evidence of accountability from potential partners or on successful staff appraisals).

It is commendable and seen as **Good Practice** by the Panel that TDHIF ensures during hiring processes that accountability is part of personal values of new staff.

While some direct links to mentioned policies and procedures are still missing throughout the report (e.g. the Child Safeguarding Measures_feedback and complaints policy or procedures on country-specific policy positions), more information and documents have been submitted directly to the Panel along with the report. The Panel suggests focusing in the next report on weakness areas summarised in the enclosed **Improvement Analysis**: Strengthening direct accountability to affected children (2.7), steps towards reporting for the federation as a whole (3.8); inviting and analysing feedback beyond child safeguarding measures, track and respond to them (NGO2); ensuring a consistent and formal evaluation framework across the federation (NGO3); as well as implementing anti-corruption policies, trainings and awareness within TDHIF (SO3). Since these identified areas are similar to the previous recommendations, it would help to understand the reasons for the lack of robust follow through.

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 these comments or amendments by 12 June 2017.

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,

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Cover Note on Terre des Hommes International Federation's Accountability Report 2015

Review Round April 2017

PROFILE DISCLOSURES

I. Strategy and Analysis1.1Statement from the most senior decision-maker
Fully addressed
The report's opening statement by Ignacio Packer, Secretary
General of Terre des Hommes International Federation (TDHIF),
provides a comprehensive overview of achievements and
developments in 2015 and 2016 – in particular on the new
Strategic Plan 2016-2020 developed in 2015. It is appreciated that
one of the five goals of this Plan is "share expertise, knowledge to
improve complementarity and accountability" (see 2.2).

TDHIF understands accountability as "clear commitments – in the eyes of others – that have been kept". At the international level, this is also reflected in the hiring process. Moreover, accountability is understood as a "shared responsibility" which strengthens relationships, e.g. among organisations of the same federation. In this regard, TDHIF is strongly encouraged to pursue Accountable Now membership (i.e. consolidated accountability reporting for all Member Organisations) for the whole federation to further strengthen this relationship. Is there a timeline in place

II. Organisational Profile

for this process?

2.1 – 2.2	Name of organisation / Primary activities
	Fully addressed
2.3	Operational structure
	Fully addressed



	The report states that MOs abide to national binding quality and accountability standards. Please specify the mechanism by which MOs commit to and report on national frameworks.
2.4 – 2.6	Headquarter location / Number of countries / Nature of ownership
	Fully addressed
	Detailed information on the International Board should rather be provided under 4.1 (not 2.6).
2.7	Target audience
	Fully addressed
	"The goals of TDHIF are to promote and support the work of the Member Organisations (MOs). () Its affected stakeholders are children who are concerned by the campaigning and advocacy work of the TDHIF-IS." In this regard, the Panel strongly recommends that TDHIF focuses on strengthening its accountability towards affected children.
2.8 – 2.9	Scale of organisation / Significant changes
	Fully addressed
2.10	Awards received Fully addressed TDHIF can be commended for having won awards for two of their documentary films.
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
	TDHIF uses the accountability reports as a learning curve for the development of its accountability. Which learnings were most valuable from the first and second reporting round? Moreover, the Panel appreciates that TDHIF widely shared the last Panel feedback with the International Board, the International



	Secretariat, MOs (e.g. via working groups) and other stakeholders. How have comments from these stakeholders affected the compilation of this report?
3.6	Report boundary Fully addressed Since Accountable Now membership only applies to TDHIF-IS, the report covers the activities of the International Secretariat mainly and only some examples of MO activities. The Panel elaborates on this issue again in its feedback on 3.8.
3.7	Specific limitations Fully addressed The Panel appreciates that TDHIF has stepped up its effort and is now able to provide data from a first trial to measure greenhouse gas emissions.
3.8	Basis for reportingAddressedTDHIF has only joined Accountable Now for their InternationalSecretariat. Thus, this report covers foremost their activities andprocedures. MOs are included where the report covers jointprojects run by the International Secretariat.
	It is stated in 3.6 that accountability is high on the agenda of MOs. Moreover, it states that MOs abide by national quality and accountability standards. Since the International Secretariat "protects the Terre des Hommes brand and it monitors compliance with core quality standards", the Panel would be interested to know how it ensures that MOs comply with strong accountability standards committed to at the international level.
	As in the previous feedback, the Panel encourages TDHIF to move towards reporting for the whole federation. This is the case for other federations, such as WVI, Oxfam, or ActionAid. Is there a timeline for this? The Panel suggests that the IS reviews the 9 or 10 national standards that MOs abide by to establish which components of these are (more or less) in common, and are also features of Accountable Now Commitments. It should,



3.10 - 3.12	henceforth, be quite easy to aggregate MOs progress regarding these items in future. What do MOs think about Accountable Now membership? Finally, the Panel looks forward to outcomes with regard to accountability standards from the Working Group Heads of Programmes. Changes in reporting parameters / Reference table <i>Fully addressed</i>
IV. Mission Engagem	n, Values, Governance, and Stakeholder
4.1	Governance structure Fully addressed TDHIF clearly describes how their chosen governance structure ensures a democratic and effective functioning of the network. The General Assembly, made up of all MOs, is the highest governance body of TDHIF. Its competencies are clearly laid out. In addition, 2.6 describes responsibilities of the International Board (according to the new Strategic Plan).
4.2 - 4.3	Division of power between the governance body and management / Independence of Board Directors Fully addressed
4.4	Feedback from internal stakeholders Partially addressed Internal stakeholders can provide feedback once a year at the General Assembly and senior staff "usually" attends Board meetings in which they can raise concerns. The Panel suggests looking at how other Accountable Now Members offer other opportunities for sharing feedback: e.g. team or departmental meetings, regular intranet feedback loops, (recorded) lunch meetings, webinars, or working groups. Interesting evidence is provided that staff / MOs recommendations have shaped decision-making in the area of network expansion and HR. It is not clear from the report how (i.e. the mechanism) feedback is submitted nor if this feedback is tracked and reported on.



4.5	Compensation for members of highest governance body
	Fully addressed
	Members of the International Board are not remunerated but are paid by the MOs as being their CEOs or senior staff. The reasonable explanation on a salary scale, which balances limited resources vs. attracting talents, is supported by monthly salary brackets for each position which was only shared with the Panel though.
4.6	Conflicts of interest
	Partially addressed
	The Panel overall considers the treatment of conflicts of interest to be too vague and un-rigorous. TDHIF's Statute and Rules of Regulations form the basic document for ensuring independence of the organisation. However, the information provided in the report lacks some crucial information. The report states that, while there is no control mechanism (i.e. Conflict of Interest Policy) in place, the International Secretariat trusts their MOs to have a rigid conflict of interest procedure in place before they make nominations for the International Board. Is there, at least, a process for reporting on conflicts of interest that are discovered with investigation into how the conflict came to be? "Trust" is insignificant for ensuring accountability and TDHIF should request conflict of interest procedures from the MOs.
	Finally: Are board members' registers of interest externally published?
4.10	Process to support highest governance body's own performance Partially addressed The International Board is elected every three years by the General Assembly. There is no formal process for evaluation of the governance body. However, as part of the new Strategic Plan development, consultations with internal stakeholders also touched upon the role and functioning of the International Board. Results from this outcome would be very interesting for the Panel.



4.14 - 4.15	List of stakeholders / Basis for identification of stakeholders Fully addressed
4.14 - 4.15	Fully addressed
4.12	Social charters, principles or other initiatives to which the organisation subscribes
	The Panel strongly suggests that self-assessment be incorporated into meetings of the International Board – such as done by other Accountable Now Members like Educo, Greenpeace or Plan International. The Panel furthermore encourages the organisation to publish Board meeting minutes on their website.

PERFORMANCE INDICATORS

I. Programme Effectiveness

NGO1 Involvement of affected stakeholder groups

Addressed

TDHIF is foremost a service provider for MOs with whom they engage via eight federation-wide Working Groups to reach the organisation's strategic objectives. Illustrative examples demonstrate how outcome lessons of these WGs have reshaped procedures and priorities. The organisation repeats its 2014 example how stakeholders influenced decision-making and changed a campaign's focus from "trafficked children" to "children on the move" to better reflect on realities on the ground. While this is a valid example, it is expected that new examples are provided in each report.

The report generally states that MOs have "elaborated systems" of programme monitoring and evaluation in place which shape engagement with directly affected stakeholders. The Panel would be interested to learn more *how* these stakeholders are involved. More specifically: How does the International Secretariat tap into this information or use it to develop advocacy campaigns? It is positively noted that TDHIF has involved consultation with youth groups as part of its policy making in 2015 though the examples given are very



	limited. The Panel suggests looking at <u>good practice</u> from Plan International in this regard (pages 47-50).
NGO2	Mechanisms for feedback and complaints Partially addressed The report only details one very specific type of complaint. Members
	of the TDHIF are actively involved in a process of "Child Safeguarding Measures" which also includes a written feedback and complaints policy. As already requested last year, more information or a direct link to this policy is needed. For example, what sort of incidents does the Working Group deal with or which body resolves the measures to be taken both to protect children and safeguard the CSO's good name? Of the 11 complaints received in 2015, five were considered closed by the end of 2015; were they resolved to the satisfaction of the complainants? And what further action is being taken regarding the other six cases?
	Data and procedures regarding other types of complaints are not described. In the future, this section should cover all complaints by the public and other stakeholders (i.e. number of complaints, nature of complaints and resolution of the complaints), not just those related to Child Safeguarding Measures.
	Moreover, it is understood that the International Secretariat itself does not have a policy in this regard but refers to general contact details of staff members on its website. Good practice in this regard would be to openly invite feedback and complaints – e.g. as it is done by <u>Islamic Relief Worldwide on their website</u> . The Panel would furthermore like to recommend looking at the <u>Global Complaints</u> <u>Policy by Sightsavers</u> as an idea on how to develop a policy for TDHIF.
NGO3	Programme monitoring, evaluation and learning
	Partially addressed
	The Panel appreciates that external consultants monitor and evaluate TDHIF's two main campaigns (Destination Unknown and ChildrenWin) and "capitalisation workshops" are offered to discuss findings among staff. Where are findings published and what are examples of lessons learnt that influence future campaign phases?



	The report states that the 1,046 field projects of MOs are monitored and evaluated in a decentralised way. The Heads of Programmes working group is, however, currently discussing the potential need for a unified evaluation framework. The Panel will check progress in this regard next year. As for the role of the International Secretariat, the Panel suggests focusing on ensuring good quality evaluations and sharing learning within the federation.
NGO4	Gender and diversity
	Addressed
	The organisation's Strategic Plan 2016-2020 identifies many factors that affect children: income inequality, geographical location, gender, caste or ethnicity. Moreover, the mission is "to work for the rights of the child and for equitable development, without racial, religious, political, cultural or gender-based discrimination." However, there is no specific goal or a policy on anti-discrimination or inclusion. Moreover, there are no written improvement targets regarding diversity issues on the international level.
	In order to move towards reporting for the federation as a whole it will be necessary to describe what specific systems, guidelines or policies are in place to identify stakeholders that risk being excluded from TDHIF's work – e.g. due to disability, ethnicity, poverty, illiteracy, age or gender? How does this in turn inform monitoring, evaluation and learning?
NGO5	Advocacy positions and public awareness campaigns
	Addressed
	Advocacy and campaigning is at the heart of the organisation's work. A solid field-basis is the foundation of all advocacy work to ensure credibility and legitimacy. TDHIF has a written procedure in place for country-specific public positions. The Panel repeats its request for a direct link to this procedure in the next report. The system of reference persons, strict rules regarding the use of images of children, and binding codes of conduct for cooperation with journalists are again positively noted.
	Corrective actions follow, if necessary, periodical reviews and an example is given in addition to the trafficking campaign example



	from NGO1. Exiting a campaign usually requires decision of the General Assembly which, however, only meets once a year. An example is provided in this regard.
NGO6	Coordination with other actors
	Partially addressed
	The answer provides relevant information on TDHIF's existing partnerships and alliances (e.g. Child Rights Connect, CONCORD, or the Sports and Rights Alliance). While the regularly reviewed alliance strategy ensures a real added value to collaboration, a systematic process on working in consortiums to leverage each other's expertise would strengthen existing efforts. This is of particular importance since the new Strategic Plan highlights collective international work (#1) and country programmatic collaboration and cooperation (#3).
	As it moves towards reporting for the federation as a whole, TDHIF is encouraged to demonstrate how it seeks evidence of accountability from potential partners and how it assists partners to meet the same high standards of accountability. Do partners and alliances share TDHIF's advocacy standards (NGO5)? Does TDHIF take any initiative to promote accountability within their relationships? As already asked last year: Are any commitments to accountability included in the selection process by MOs (e.g. due diligence or MoUs)?
	Regarding internal coordination, is there a requirement that only one MO operates in a given country (or part of the country)?
II. Finar	ncial Management
NGO7	Resource allocation
	Partially addressed
	TDHIF shares its audited financial report (as Annex I of the report)
	which is also partially published in its Annual Report. Why are audited
	accounts not published in full (ie. Inclusive of notes)? Solid tools for financial management and checks and balances seem to be in
	place. It is noted that "special activities" account for over 50% of expenditures.
NGO8	Sources of Funding



	Fully addressed It is assumed by the Panel that provided figures apply to 2015 (not 2014). Moreover, the Panel would like to flag a potential donor dependency with the Oak Foundation being responsible for over 60% of TDHIF's current income.
III. Env	ironmental Management
EN16	Greenhouse gas emissions of operations
	Partially addressed
	As a follow up to previous Panel feedback, TDHIF has started to measure its greenhouse gas emissions. More details on CO ₂ consumption were shared with the Panel directly but could be explained in more detail in future reports (e.g. what is DUC?). These figures show that travel of the International Secretariat is the largest contributor to overall CO ₂ emissions. The Panel looks forward to future improvements from these first benchmark figures. Greenpeace has a clear methodology in place ("CloudApps") and the Global Footprint Network might be useful for advice. Most importantly, TDHIF should put effort into suggesting a federation-wide approach.
EN18	Initiatives to reduce emissions of operations
	Addressed
	As in the previous year, TDHIF encourages the use of low-carbon transport to reduce its greenhouse gas emissions. The Panel would be interested to know if there is a <i>systematic</i> approach to environmental management guided by senior management oversight and regular assessment? Are there any concrete reduction targets?
EN26	Initiatives to mitigate environmental impact of activities and services
	Addressed
	Energy consumption, paper and document management, waste management, and travel are the main environmental impacts of
	TDHIF's work. TDH organisations' efforts to protect children from
	climate change hazards and to support environmental education for children (e.g. Robin the Watts programme) are highly appreciated.



	How are environmental assessments (e.g. impact of air travel) conducted prior to carrying out activities or campaigns?		
IV. Hu	IV. Human Resource Management		
LA1	Size and composition of workforce		
	Fully addressed		
EC7	Procedure for local hiring		
	Addressed		
	As mentioned last year, being situated in Switzerland and Belgium, it is recommended to focus on a diverse workforce rather than local hiring. How diverse is the current workforce in Belgium and Switzerland? Is it possible for staff from a range of MOs to move to the Secretariat?		
	Moreover, the report says that the "very vast majority of 3,333 field staff is comprised of local staff. Is a concrete figure / percentage available to support this statement?		
LA10	Workforce training		
	Addressed		
	TDHIF provides information on what is understood as training (both individual and collective) and how specific needs are identified. The organisation encourages workforce training as outlined in the so- called Staff Rules. 1,000 CHF per staff member are budgeted for training each year at the international level. How much has actually been invested in 2015, i.e. how much staff received training?		
	The Panel requests to hear more on the follow-up tracking to the collective training in the 2016 report.		
LA12	Global talent management		
	Addressed		
	There is no global talent management system to regularly identify future HR needs and developing staff accordingly – due to the small size of the International Secretariat. Generally, all staff receive annual appraisals. Is there evidence that these appraisals function well in practice?		



LA13	Diversity of workforce and governance bodies
	Addressed
	There are gender imbalances in the International Board (one women
	vs. seven men) and among staff (six women vs. three men); however,
	the more important issue is the over-representation of people coming
	from Western Countries in both bodies. TDHIF has not responded to
	the previous Panel question whether there are any improvement
	targets in this regard. Is there a general diversity / inclusion policy in place? Please provide a link. How is equality pursued with regard to
	hiring targets and compensation?
	It is commendable and seen as Good Practice by the Panel that TDHIF ensures during hiring processes that accountability is part of
	personal values of new staff (page 6 of the report).
NGO9	Mechanisms to raise grievances
	Fully addressed
	The Staff Rules determine the way to raise grievances to
	management regarding working conditions. The main issue raised in 2015 by staff was about workload. As a consequence, a special
	programme to ensure work-life-balance has been set up together
	with a work psychologist. What other grievances were raised in 2015?
V Resr	oonsible Management of Impacts on Society
SO1	Managing your impact on local communities
	Partially addressed
	TDHIF abides to the standards of the Keeping Children Safe Coalition
	in regard to their work on child protection. This says any wrongdoing
	should be reported to the Safeguard Children focal point in each
	country. However, how does one find who that is and how to report?
	The Panel checked e.g. TDH Italy's website where this was not clear.
	Moreover, all staff have to sign a code of conduct (see Annex II of
	the report) and serious cases of breach are submitted to the International Board.
	However, as raised last year: Does TDHIF conduct needs assessments,
	situation analyses, problem analyses, stakeholder analyses,
	envisaged project impact or baselines prior to interventions? While



	this is more difficult with advocacy programmes, a broader analysis of potential impact (positive and negative) of TDHIF's advocacy work is required beyond child protection. In this regard, the Panel would like to better understand the mechanisms used by TDHIF to analyse the potential impact of their work on communities – e.g. how can TDHIF draw on field experience and feedback that MOs received from communities? This is of critical importance with regard to the high level of advocacy work TDHIF does.
SO3	Anti-corruption practices Partially addressed TDHIF demonstrates how a double-signature system and external annual audits prohibit and prevent cases of corruption. However, it would be useful to understand if the organisation assesses where it could be potentially exposed to corruption, bribery, or fraud. It is therefore highly recommended to develop anti-fraud / anti- corruption practices and policies (also mentioned in NGO7) and the Panel will track progress in this area. It is appreciated that TDHIF shared the anti-fraud policy of the Terre des Homme Foundation in Lausanne with the Panel. This can indeed be a good basis for developing a policy fit for TDHIF.
	There is currently no staff training on anti-corruption issues. Once the above policies will have been developed, it is important that staff with financial and management responsibility in the MOs as well as the International Secretariat's staff at all levels and in all functions are made aware of the procedures in place and where to turn in case of suspicion of corruption.
SO4	Actions taken in response of corruption incidents Addressed TDHIF-IS is not aware of any incidents of corruption or fraud. As already reflected upon last year, the organisation is well aware that this way of functioning is not sustainable and that and that the development of an anti-corruption policy is needed. The Panel looks forward to progress in the next report. Please also clarify whether the



	International Secretariat has any role in relation to corruption investigations in MOs.	
VI. Ethical Fundraising		
PR6	Ethical fundraising and marketing communications	
	Addressed	
	It is understood that fundraising activities are mainly carried out in a decentralised manner by MOs and not by the International Secretariat. Nevertheless, the Panel would again like to know how it is ensured that procedures respect the dignity of affected people and that funds are used in the designated way (beyond adhering to national accounting standards).	
	There have been no recorded instances of complaints relating to fundraising in 2015. However, the Panel does not find the TDHIF's website very clear with regard to filing potential complaints.	