Accountable Now

GLOBAL STANDARDS LOCAL TRUST

Transparency International
Independent Review Panel Feedback

Accountability Report 2015
Review Round July 2017

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Feedback from the Independent Review Panel
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07 September 2017

Dear Robin Hodess,

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 recent study 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.

Feedback Labs, with whom Accountable Now collaborated on the *People-Powered Accountability* project, 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 12 Accountability Commitments, 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 Transparency International:

Transparency International's interim report demonstrates a continued **institutional commitment** to accountability, with a strong statement from Interim Managing Director Robin Hodess, and a number of new strategies and systems introduced in 2015 to improve TI-S' accountability practice. However, it was unclear whether some of these were the same as those mentioned in TI-S' last report (e.g. the impact monitoring approach and Code for Ethical Advocacy).

Some of the Panel's feedback on the 2014 report appears to have been taken on board, with TI-S having developed a new impact monitoring approach, and expressing their aim of using data more systematically in future reports. While no improvements have been made regarding environmental sustainability (EN16 and EN18) in this reporting period, TI-S reaffirmed its ambition to tackle these issues and introduce an overarching environmental policy in 2017. The Panel understands that TI-S was not able to demonstrate significant improvement in this report due to reduced capacity surrounding leadership changes, and looks forward to more progress in the next report.

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 22 September 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,

Mihir Bhatt   Rhonda Chapman   John Clark   Louise James

Jane Kiragu   Nora Lester Murad   Saroeun Soeung

Cover Note on Transparency International's Accountability Report 2015
Review Round July 2017

PROFILE DISCLOSURES

I. Strategy and Analysis

1.1	*Statement from the most senior decision-maker*
	Fully addressed
	The statement from Interim Managing Director Robin Hodess demonstrates a continued strong **institutional commitment** to accountability within TI-S.
	A number of new strategies and systems were implemented in 2015, with aims of strengthening internal accountability. The new *Strategy 2020* stresses the importance of impact monitoring and commits to publicly disclose all monitoring and evaluation results against the strategy, which is a commendable undertaking. The Panel is pleased to note that the strategy also has strong commonalities with Accountable Now's accountability commitments.
	An external review of the TI Secretariat in 2015 triggered a major reorganisation, and the aim to redefine responsibilities to strengthen internal accountability is noted positively.
	Beyond internal accountability, TI also undertook a number of activities which raised awareness of the importance of transparency, integrity and accountability externally.

Material Changes

In 2015, US-based Friends of Transparency International was integrated into TI's audited financial statements and will be part of TI-S' future accountability reports. This is part of an update to TI-S' accounting policies, including consolidation of financial statements.

A TI-wide Chapter Financial Risk Assessment tool was also introduced in 2015, which improves internal movement accountability, promotes financial compliance, and supports good governance.

It was stated that a Code for Ethical Advocacy and Value for Money approach were adopted to strengthen the TI-S accountability framework. The Panel would like to know whether there are any changes to the Code of Ethical Advocacy compared to the one in place at the time of the previous report.

The Panel would also welcome a brief update on any recent changes or challenges at TI-S, for example in governance.

Evidence

TI-S is open about the room for improvement in using data more systematically and broadly in their reports, and the Panel's advice to do so will be taken on board in TI-S' future reports.

TI-S has also taken steps to improve evidence of impact, adopting a new impact monitoring approach in 2015 (again, the Panel was unsure whether this is any different to the one identified as a good practice in TI-S' last report). The approach consists of an analytical impact matrix and in-depth impact reviews. The Panel looks forward to more information about how this system has been used in practice, in TI-S' next report.

Work with National Chapters

TI-S states that they promote accountability across their network as a core priority via internal governance processes, regular financial reporting, and in externally facing activities.

In their previous feedback letter, the Panel had asked TI-S to clarify how it ensures its accountability commitments become more relevant at the National Chapter level. While details on progress on this matter were not given in this interim report, TI-S said they would provide such details in their next report on the year 2016. That report will also include information about TI-S' updated accreditation framework which aims to ensure adequate complaint mechanisms at Chapter level. The Panel looks forward to receiving this information.

The interim report does clarify the Panel's question about how complaints received at Chapter level against TI-S are forwarded to the Secretariat. Although TI-S states that this is an unlikely occurrence, one instance of this in 2015 led to a new policy allowing arbitration when TI-S and its affiliates are in conflict on advocacy positions. The Panel is interested in hearing in the next report about how this policy, as well as an explicit process for channelling complaints from Chapters to the Secretariat, have functioned in practice.

PERFORMANCE INDICATORS

III. Environmental Management

EN16 & EN18	***Greenhouse gas emissions of operations and initiatives to reduce emissions***
	Partially addressed
	The Panel had questioned the increase of greenhouse gas emissions by one third in 2014, and highlighted the need for an overarching environmental policy. TI-S has not been able to tackle these issues in the past year, but reaffirms their ambition to do so in 2017.