



**Accountable
Now**

GLOBAL STANDARDS LOCAL TRUST



ARTICLE 19 Independent Review Panel Feedback

**Accountability Report 2016
Review Round February 2018**



ARTICLE 19

Feedback from the Independent Review Panel

Review Round February 2018

23 March 2018

Dear Thomas Hughes,

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.

ARTICLE 19's fifth accountability report was received positively by the Panel, and **institutional commitment** to accountability is evident. However, more new information and examples from the reporting period would have been appreciated, particularly to strengthen the evidence base. ARTICLE 19's Mx Method approach to sex, sexuality and gender equality (NGO4) in its strategy, operations and internal processes is identified as a **good practice**. Mechanisms for feedback and complaints (NGO2) and the size and composition of workforce (LA1) remain **areas for improvement**.

It is appreciated that ARTICLE 19 presents Accountable Now membership on their [website](#), including the accountability commitments. ARTICLE 19 is asked to update this information to our new name throughout (instead of INGO Accountability Charter or Accountable Now) and update references to the new [12 Accountability Commitments](#). All full members are also requested to publish our logo on their website.

In light of the recent, highly publicised allegations of NGO staff malpractice, we are aware that many of our members are working hard to review their relevant policies and procedures regarding whistleblowing, management and/or independent investigations of alleged malpractice. We ask that all members discuss these matters fully in their 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 13 April 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,

Mihir Bhatt

John Clark

Louise James

Jane Kiragu

Nora Lester Murad

Saroeun Soeung



ARTICLE 19's Accountability Report 2016

Review Round February 2018

PROFILE DISCLOSURES

I. Strategy and Analysis

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| 1.1 | <p>Statement from the most senior decision-maker</p> <p><i>Fully addressed</i></p> <p>The opening statement from CEO Thomas Hughes highlights the importance of accountability and impact to ARTICLE 19's work. Reference is made to two new systems that help review ARTICLE 19's progress against strategic objectives and deliverables – are these the Camms Cycle and Access Dimensions referred to in the previous report? Some updates on their use would better illustrate how they contribute to internal accountability and transparency.</p> <p>The statement is largely identical in content to those in previous reports (this may explain the reference to Accountable Now by its former name, the INGO Accountability Charter). The Panel would like to see some reference to relevant initiatives, successes or learnings from the reporting period to further illustrate how accountability shapes strategy and decision making.</p> |
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II. Organisational Profile

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| 2.1 – 2.7 | <p>Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience</p> <p><i>Fully addressed</i></p> <p>The Panel repeats its feedback on the last full report from 2014: in 2.3, the first and second paragraphs under geographical structure does not add much value to the report, and duplicates indicator 2.5. The Panel suggests that these paragraphs are removed in future – and that only any relevant changes are highlighted – to create a more concise report.</p> |
| 2.8 | <p>Scale of organisation</p> <p><i>Fully addressed</i></p> <p>ARTICLE 19 provides comparable data for the last six years. The Panel repeats its question about whether ARTICLE 19 works with volunteers and the nature and extent of such work.</p> |



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| 2.9 – 2.10 | <p>Significant changes / Awards received</p> <p><i>Fully addressed</i></p> <p>The Panel congratulates ARTICLE 19 on the two awards received by their staff members in 2016.</p> |
| III. Report Parameters | |
| 3.1 – 3.4 | <p>Reporting period / Date of most recent report / Reporting Cycle / Contact person</p> <p><i>Fully addressed</i></p> <p>The Panel would like to remind ARTICLE 19 that it is on a bi-annual reporting cycle as of 2015.</p> |
| 3.5 | <p>Reporting process</p> <p><i>Fully addressed</i></p> <p>The Panel commends ARTICLE 19 for taking its feedback into consideration when planning the reporting process, and for creating structured project management systems for the creation of the report. Consultation with stakeholders and incorporation of their feedback into the report is also noted positively.</p> |
| 3.6 – 3.8 | <p>Report boundary / Specific limitations / Basis for reporting</p> <p><i>Fully addressed</i></p> <p>The Panel notes that ARTICLE 19's size and limited resources means that they do not have the data needed to report fully on every indicator. The report does not include activities of partner organisations not directly managed by ARTICLE 19, nor the financial details of ARTICLE 19 Mexico which is legally an independent entity.</p> |
| 3.10 – 3.11 | <p>Reporting parameters</p> <p><i>Fully addressed</i></p> <p>No significant changes are reported.</p> |
| 3.12 | <p>Reference table</p> <p><i>Fully addressed</i></p> <p>A reference table is not necessary since ARTICLE 19 follows the standard report format.</p> |



IV. Mission, Values, Governance, and Stakeholder Engagement

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| 4.1 | <p>Governance structure</p> <p><i>Fully addressed</i></p> <p>Information on the governance structure, including the Board and its committees, is provided. However, information on the level of authority, and on risk management processes, is missing in this year's report and we assume remains as it was in the previous report.</p> |
| 4.2 – 4.3 | <p>Division of power between the governance body and management / Independence of Board Directors</p> <p><i>Fully addressed</i></p> <p>More information on how the Board and Executive Director work together and support each other would be welcome in the next report. For example, how does the Board evaluate the Executive Director, and with what frequency is this done?</p> <p>The Panel would also like to know who recruits and evaluates regional directors and whether regional offices have their own Boards.</p> |
| 4.4 | <p>Feedback from internal stakeholders</p> <p><i>Fully addressed</i></p> <p>General information about mechanisms for internal stakeholders to provide recommendations is shared. We found the illustrations used in the last report helpful and look forward to learning about similar examples in the next full report, and to seeing the beneficiary feedback policy on ARTICLE 19's website.</p> |
| 4.5 | <p>Compensation for members of highest governance body, senior managers and executives</p> <p><i>Partially addressed</i></p> <p>Members of ARTICLE 19's highest governance body are not compensated and work on a voluntary basis.</p> <p>No information was provided in this report about the salaries of senior managers and executives. The Panel notes that ARTICLE 19 reviewed its salaries in previous years in a benchmarking exercise, and would have liked to hear about recent developments in this report.</p> |



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| 4.6 | <p>Conflicts of interests</p> <p><i>Addressed</i></p> <p>The answer given is the same as in the previous reports, and the Panel repeats its request for more detail demonstrating how this policy is applied in practice.</p> |
| 4.10 | <p>Process to support highest governance body's own performance</p> <p><i>Addressed</i></p> <p>The Panel is pleased to hear that a governance manual defining board responsibilities, term limits, appointment procedures and performance evaluation is being created. Completion was expected in late 2017, and the Panel would like to see details in the next report.</p> <p>The undertaking of a skills audit in 2016 is noted positively. How do the new candidates appointed to the Board in 2016 fill the gaps identified in the audit?</p> |
| 4.12 | <p>Social charters, principles or other initiatives to which the organisation subscribes</p> <p><i>Fully addressed</i></p> <p>Membership of the International Aid Transparency Initiative (IATI) is not mentioned in this report – though it appears that ARTICLE 19 was still a member in 2017.</p> |
| 4.14 | <p>List of stakeholders</p> <p><i>Fully addressed</i></p> <p>An extremely comprehensive list of stakeholders is provided.</p> |
| 4.15 | <p>Basis for identification of stakeholders</p> <p><i>Addressed</i></p> <p>The answer provided is the same as in the previous full report. The Panel therefore repeats its previous request for an explanation of how stakeholders are systematically identified and prioritised. A previous report had mentioned a strategic planning process to clarify stakeholder analysis and influence mapping criteria, and the Panel had requested updates in this regard.</p> |



PERFORMANCE INDICATORS

I. Programme Effectiveness

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| NGO1 | <p><i>Involvement of affected stakeholder groups</i></p> <p><i>Addressed</i></p> <p>The author of this section appears to have misunderstood what information is sought - namely how stakeholders influence your organisation's strategy and activities. Apart from the final paragraph, the response to NGO1 is largely irrelevant, and mostly just addresses M&E. A more comprehensive strategic approach to involving stakeholders at various levels of the organisation would be appreciated in the next report, as well as examples of how stakeholder engagement has shaped decision making, policies, or processes. E.g. examples from the 2014 report of how feedback highlighting the importance of multi-stakeholder cooperation is shaping ARTICLE 19's work on protecting civic space, (even when encroached upon) or having managed a greater gender balance of participants in workshops in Brazil by taking into account the specific needs and schedules of women.</p> |
| NGO2 | <p><i>Mechanisms for feedback and complaints</i></p> <p><i>Partially addressed</i></p> <p>ARTICLE 19's complaints and feedback process for stakeholders, partners and staff is outlined.</p> <p>However, the written complaints policy which was mentioned in the 2014 report and was expected to be published on the website in 2015 is not linked, and is expected to go online in early 2018. A complaints mechanism is one of the minimum requirements for Accountable Now membership, and the Panel urges ARTICLE 19 to make the policy and mechanism publicly available as soon as possible.</p> <p>The same applies for the Whistleblower Protection policy, although this information should be reported under indicator NGO9, as mentioned in the Panel's feedback on the 2014 report.</p> <p>Again, no information has been provided in the 2016 report about the number of complaints, their categories and whether they were resolved satisfactorily for both parties and when not where the matter rests. The Panel repeats its request for this information, along with evidence that the complaints policy has led to positive management response, in the next report.</p> |



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| NGO3 | <p>Programme monitoring, evaluation and learning</p> <p><i>Addressed</i></p> <p>Unfortunately, a description of ARTICLE 19's monitoring and evaluation systems is not provided. Their M&E toolkit is mentioned, as well as cross-organisational communities of best practice, but the Panel would like to know how MEL systems feed into strategic and operational processes, how programmes are adjusted according to results, and how MEL has shaped management decisions.</p> |
| NGO4 | <p>Gender and diversity</p> <p><i>Fully addressed</i></p> <p>ARTICLE 19's Mx Method approach to sex, sexuality and gender equality in its strategy, operations and internal processes is explained. The Panel commends this approach for going beyond the obvious barriers experienced by women and LGBTQI persons, to consider less well known or understood factors and explore creative solutions. Several examples are provided, which is helpful in demonstrating what the Mx Method looks like in practice. The Panel identifies the method as a good practice.</p> <p>ARTICLE 19 also has ethical engagement principles for working with persons in vulnerable situations, focusing on minimising harm in the activities it offers, and works towards achieving gender balance amongst participants. The Panel would welcome figures on this – how often is the 50% target met?</p> <p>Whilst it is stated that other forms of diversity, such as race, age, ability, nationality, ethnicity or religion are also considered, more information is requested in future full reports on how those factors are addressed comprehensively in strategy and operations, whether there are targets, and progress on meeting these.</p> <p>Finally, ARTICLE 19 includes clauses in all contracts with partners, requiring non-discriminatory and gender perspectives in all their activities. The Panel commends this, especially the requirement for reporting on how this has been achieved.</p> |
| NGO5 | <p>Advocacy positions and public awareness campaigns</p> <p><i>Fully addressed</i></p> <p>ARTICLE 19 has made efforts to strengthen and coordinate its campaigns planning, promoting the campaigns role to manager level and separating it from communications, to foster coordinated and strategic global</p> |



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| | <p>campaigning. A global campaigns workshop brought together ARTICLE 19's different offices to share thoughts on global campaigns.</p> <p>A campaigns model and engagement approach is still being developed, and was planned to be completed in 2017 – the Panel looks forward to further details in the next report.</p> <p>Information about stakeholder participation in advocacy, processes for corrective action, and exit strategies was missing in this report, and the Panel requests details in the next report.</p> |
| NGO6 | <p>Coordination with other actors</p> <p><i>Addressed</i></p> <p>Partnerships are key to ARTICLE 19's work, and partners are included in project start-up meetings as well as quarterly and annual reviews. ARTICLE 19 also works in consortiums to leverage expertise and knowledge, and the organisations' efforts and successes are built upon together.</p> |
| II. Financial Management | |
| NGO7 | <p>Resource allocation</p> <p><i>Fully addressed</i></p> <p>The report explains how ARTICLE 19 ensures effective resource allocation and tracking. The percentage of funds spent in different geographic areas is also provided.</p> <p>A link to the annual audited accounts is provided but this was faulty, and a search of the website did not immediately reveal where this information is published. A functioning link is requested.</p> |
| NGO8 | <p>Sources of Funding</p> <p><i>Fully addressed</i></p> |
| III. Environmental Management | |
| EN16 | <p>Greenhouse gas emissions of operations</p> <p><i>Fully addressed</i></p> <p>Data on greenhouse gas emissions for the past five years is provided. The total emissions has reduced by over a third since 2014, which the Panel commends. It would have been interesting to know what categories the emissions fell into (e.g. travel, energy/water use) and where the reductions were made.</p> |



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| EN18 | <p>Initiatives to reduce emissions of operations</p> <p><i>Fully addressed</i></p> <p>The response is mostly the same as that provided in the 2014 report, noting the need to balance reduced staff travel with the importance of staff interacting with stakeholders. Trains will be taken when feasible (and when cheaper than flights).</p> <p>The environmental policy which was planned for completion in 2015 is now planned to be published online in early 2018. The Panel requests a link to this policy in the next report.</p> |
| EN26 | <p>Initiatives to mitigate environmental impact of activities and services</p> <p><i>Addressed</i></p> <p>The Panel notes that the response to this question is identical to the one from the 2014 report. As such, the Panel repeats its feedback to that, but in order for the reporting process to be meaningful, suggests that ARTICLE 19 focus on new material in the next report.</p> <p>ARTICLE 19's efforts to reduce greenhouse gas emissions by reducing travel and opting for train and public transport over flights and cars are noted positively. Procurement procedures also consider the environmental impact of the supplier.</p> <p>Environmentally friendlier alternatives are also considered when planning projects. Some concrete examples would be appreciated in the next report. Are environmental assessments conducted prior to carrying out activities? Information on the main impacts (apart from travel) of programmes and activities are also of interest to the Panel.</p> |
| <p>IV. Human Resource Management</p> | |
| LA1 | <p>Size and composition of workforce</p> <p><i>Partially addressed</i></p> <p>The answer provides a breakdown of the workforce according to contract type and gender. The respondent appears to have misunderstood the question about responsibility levels; the intent is to ask the gender and diversity breakdown between management and other staff.</p> <p>A breakdown by region was not provided. Why is this, and is it foreseen to provide this information in the next report?</p> <p>Figures on different responsibility levels and gender would be helpful in illustrating the gender divisions at managerial level.</p> |



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| EC7 | <p>Procedure for local hiring</p> <p><i>Fully addressed</i></p> <p>All senior managers have been hired locally, which the Panel commends. The 2014 report stated that all staff in regional offices were also hired locally. Is this still the case?</p> <p>An explanation of the broader approach is requested in the next report. The 2014 report had included a reference to the Recruitment Policy. How does ARTICLE 19 ensure that its hiring practices do not undermine local NGOs?</p> |
| LA10 | <p>Workforce training</p> <p><i>Addressed</i></p> <p>ARTICLE 19 provides training at individual, team, and organisational level, based on performance reviews as well as in response to the introduction of new technologies or processes. The Panel appreciates that soft skills training, covering communication, stress management, and security is also offered. Feedback is collected after each training, and the most recent training received positive feedback overall. Is there any further evidence that the training has led to improved results by staff?</p> |
| LA12 | <p>Global talent management</p> <p><i>Fully addressed</i></p> <p>All staff at the International and Tunisia offices receive regular performance and career development reviews. Information on the other offices was not available, but with the CAMMs system, ARTICLE 19 plans to carry out performance reviews for all staff by the end of 2018. The Panel looks forward to further information on this in the next report, including evidence that staff development is working well in practice (e.g. the 2014 report cited a number of promotions as a result of performance reviews and performance development plans).</p> |
| LA13 | <p>Diversity of workforce and governance bodies</p> <p><i>Addressed</i></p> <p>The gender breakdown of staff and the Board of Trustees is provided, and the Panel commends the fact that 69% of staff are female. 38% of Trustees are female. The Panel would be interested in the breakdown of the senior management team, as well as information on geographic representation and other factors such as age, minority group, etc.</p> |



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| | <p>Even if ARTICLE 19 is not able to gather comprehensive data on these other diversity issues, the Panel repeats its recommendation that ARTICLE 19 consider what groups they would like to be represented.</p> |
| NGO9 | <p>Mechanisms to raise grievances</p> <p><i>Addressed</i></p> <p>The answer was the same as that provided in the 2014 report, describing ARTICLE 19's grievance procedure for staff. Links to the grievance and code of conduct policies should be provided in the next report – the latter is available on the website and addresses fairly carefully staff grievance and whistle-blower processes.</p> <p>Evidence demonstrating that grievances were resolved satisfactorily was also missing, although some examples had been provided in the 2015 interim report. Reference to that response would be beneficial, as it had been rated as “Fully Addressed” by the Panel.</p> |
| <p>V. Responsible Management of Impacts on Society</p> | |
| SO1 | <p>Managing your impact on local communities</p> <p><i>Addressed</i></p> <p>The response provides a detailed overview of how ARTICLE 19 evaluates their successes in promoting local community voices, with a number of useful examples provided. There is also an example of how stakeholders were identified and engaged with positive results in Tunisia.</p> <p>Interview consent forms are used to protect vulnerable stakeholders, and feedback mechanisms as well as post-project evaluations allow ARTICLE 19 to evaluate their impact and redesign projects as needed. How much of the work is reported to local actors and communities, and how are voices amplified?</p> |
| SO3 | <p>Anti-corruption practices</p> <p><i>Fully addressed</i></p> <p>The Panel commends ARTICLE 19 on having trained around 80% of its workforce on anti-corruption, anti-fraud and anti-bribery issues – a significant improvement from previous years. Further training across all regional offices was planned for 2017. Information on whether these trainings have yielded positive results would be a helpful indicator of their effectiveness.</p> <p>Risks are logged in a risk register along with steps to address them, and a due diligence policy requires reviews of all partners before signing new contracts.</p> |



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| | A link to the anti-corruption policy is requested in the next report – this is planned to be published on the ARTICLE 19 website in early 2018. |
| SO4 | <p>Actions taken in response of corruption incidents</p> <p><i>Fully addressed</i></p> <p>No incidents of corruption were reported in 2016.</p> |
| VI. Ethical Fundraising | |
| PR6 | <p>Ethical fundraising and marketing communications</p> <p><i>Addressed</i></p> <p>The response is the same as that provided in the 2014 report, and the Panel repeats its recommendation that ARTICLE 19 creates policies to ensure that needs are adequately described, the dignity of affected people is protected, and funds are used in the designated way regardless of their source.</p> <p>The Panel would like to know what progress has been made with the fundraising strategy 2015-2020, as well as the Monitoring, Evaluation and Impact system (MEI).</p> <p>ARTICLE 19 received no complaints or breaches relating to its fundraising or communications activities in 2016.</p> |