

Dear Jane, John, Louise, Michael, Rhonda and Sarouen,

Many thanks for the helpful feedback shared by the review panel on ARTICLE 19's most recent INGO Accountability Charter report, in your letter of 16 December 2015. Overall, we warmly welcome your overall recognition of our 'very high level of transparency and accountability' to our key stakeholders. Working with others to continually improve their commitment and practice in this area is at the heart of our organisational mission, so it is gratifying to receive external independent validation and commendation of our own good practice on this.

We also agree with the panel's proposal to move to reporting fully against the Charter commitments on a two-yearly basis from now on, with 'light touch' updates as mentioned in the interim year. Detailed comments and further information on the improvement analysis areas mentioned are included in the attachment, along with an updated version of the report originally submitted which reflects some of these additional changes. However, we would also like to take this opportunity to provide additional feedback and information on relation to some of the general points raised in your accompanying letter.

### **On getting fit for the digital age**

One notable example of how we are effectively engaging stakeholders in our work through digital platforms has been the process that we went through to [develop the protest principles](#), with an open, online consultation to engage a broader array of stakeholders and experts. A wide online consultation process on our draft principles on freedom of expression/information and persons with disabilities has also enabled feedback from a variety of experts, civil society and people with disabilities to be considered. We are planning similar e-consultation approaches for some key pieces of work in future.

Another significant development at a programmatic level was in Bangladesh, where we [launched a twelve-point Charter of Rights for the protection of Online Expression](#) in July 2015, demanding that laws and restrictions in relation to freedom on the internet should comply with international standards. This was one of the outcomes of a yearlong initiative focused on direct engagement with bloggers and online activists, and has gained wide recognition and media interest. The Charter highlights rights for bloggers, including protection from violence and harassment, non-disclosure of sources, and the refusal to register with government or any other oversight body. It encourages bloggers to self-regulate, developing codes of conduct or abiding by those already-formulated by traditional media.

In the medium term, we are also planning on giving access to our key strategic supporter and donor audiences through a 'business intelligence system' to keep regularly updated on our progress towards achieving our strategic outcomes. In terms of 'fitness' of our own digital and technological infrastructure, we have also already completed the transition of our Brazil office to full open source and securer digital tools as a 'test case', have also introduced new applications/methods for secure chat and document collaboration across all our offices, and also switched to secure hosting for our email server and satellite websites.

We will look at the Digital Accountability project to see if there are applicable lessons to be learned for our own engagement.

### **On globalisation/national level accountability**

In relation to effective and independent oversight, it is worth mentioning that independent regional boards already exist for ARTICLE 19 in Central America (Mexico-based), East Africa (Kenya-based) and South America (Brazil-based), which have not been explicitly mentioned in the 'governance structure' sections of our recent annual reports. This move towards a more federated approach has increased the accountability of our regional offices to their regional boards, rather than to the international one. We also foresee the creation of advisory boards for our South Asia (Bangladesh-based) and West Africa (Senegal-based) regions during 2016.

DEFENDING FREEDOM  
OF EXPRESSION AND INFORMATION

### **On inclusion and diversity**

We fully concur with the comments you make about the importance of taking a broadly inclusive and holistic review of diversity, and our organisational approach continues to do this. Our new organisational strategy does place significantly renewed emphasis and more explicit focus on women, girls, and sexual and gender groups, than was previously the case, as previously it was included as an outcome grouped in an overly broad category of 'groups at risk'. In 2016, the further development and roll-out of our unified approach gender – the 'Mx' methodology, conceived over the past year - will include an organisational review, the creation of guidelines, checklists and monitoring tools, and documentation of internal policies and practices.

Disability has been part of ARTICLE 19's programmatic work since 2012 and continued to be also in 2014/15 both globally and at country level. In June 2014, ARTICLE 19 hosted a two-day expert roundtable on our principles on free speech and persons with disabilities (PwD). Following this, in November 2014, ARTICLE 19 was invited to participate in the first international conference on the role of ICTs for PwD, in New Delhi, India. We were a key partner of UNESCO in this conference and organised a panel on FoE and PwD and succeeded to strengthen our work with civil society on rights of PwD. In Kenya, we completed a brief on the status of implementation of the right to FoE/I for PwD which we used as advocacy tool with key actors. In 2015, we also published a [report on disability and access to information in Lebanon](#) highlighting experiences from disabled persons' organisations which struggle to access government information on education, health and budgets.

ARTICLE 19 has also drafted principles on FoE/I and persons with disabilities, based on findings from expert meetings and desk research. A wide online consultation process has allowed feedback from experts, civil society and PwDs to be considered. The final version of the principles will be launched in 2016 and will be accessible in different formats.

In addition, we are in the process of transitioning to a more systematic approach as we have included disability in our new strategy as part of "Civic Space", one of our five core strategic thematic priorities. Participation and Equality and Non-discrimination are two of the three global outcomes under this theme, and one of our global activities over the next two years will be to ensure that minorities and marginalised communities (religious, LGBT, disabled, gender) particularly in Indonesia, Malaysia, Tunisia and Myanmar will be better able to challenge incitement. As part of our strategy, our regional offices and programme will include how they plan to achieve these outcomes in their two-year operational plans and report on them on a quarterly basis. Our progress against achieving these outcomes will be assessed using evidence gathered throughout the year and regularly reviewed across the organisation.

In terms of our own recruitment policies, an appreciation of the benefits of diversity is at the core of our staffing policy of recruiting locally for all our regional offices, which builds a naturally diverse workforce given that this is where the majority of our employees are based. However, we accept that there is still room for improvement and increased focus in ensuring that local minorities and disadvantaged people are more consciously recruited.

### **On website visibility**

The suggestion for improved visibility on our website in terms of referring to the Charter has been actioned with addition of text and a link [here](#). Inclusion of the Charter logo at this point requires outsourced support and will be incorporated in future into our planned website redevelopment.

We look forward to our follow-up meeting with representatives from the panel on 21 March. In the meantime, many thanks in advance for reviewing this response to your feedback.

Yours sincerely,



Thomas Hughes  
Executive Director