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. 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 10 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 ARTICLE 19:**

ARTICLE 19’s fourth accountability report is comprehensive and concise interim report, based on the Improvement Analysis as part of the previous Feedback Letter from the Independent Review Panel. All issues raised in the recent Improvement Analysis are covered and the report demonstrates interesting examples of good accountability practice.

Overall, it is clear that ARTICLE 19 takes the Panel feedback seriously and tries to incorporate it into ongoing and new initiatives or reviews. The Panel welcomes the strengthened commitments, and points to a few areas in which stronger actions might be considered, in particular: in anti-corruption trainings, complaints handling (e.g. number / types of complaints received and the resolution thereof), or publishing all relevant policies on ARTICLE 19’s current website.

Strong and forward-looking institutional commitment is highlighted in the opening statement demonstrating how the new six-year strategy (“Expression Agenda”) as well as new project and financial management tools deepen ARTICLE 19’s commitment to accountability. New tools for project and financial management are expected to lead to stronger evidence base for future reports.

It is appreciated that ARTICLE 19 prominently presents Accountable Now Membership on their website. However, following Accountable Now’s rebranding in 2016, the organisation is asked to update this information to the new name (instead of INGO Accountability Charter). Moreover, all Full Members are also requested to publish the new logo, too. This visualisation would clearly strengthen
ARTICLE 19’s public commitment to accountability – also for stakeholders to hold them directly accountable towards the commitments made.

Overall, the Panel looks forward to receiving ARTICLE 19’s next full Accountability Report on 2016.

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 1 July 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
Michael Roeskau
Saroeun Soeung
### PROFILE DISCLOSURES

#### I. Strategy and Analysis

1.1 **Statement from the most senior decision-maker**

   *Fully addressed*

   Thomas Hughes, ARTICLE 19’s CEO, provides convincing and ambitious insights in his opening statement on the relevance of accountability to the organisation’s work. Accountability guides the organisation’s decision-making and strategic thinking as they use the power of access to information to hold decision-makers to account for their actions. While parts of this statement are very similar to the previous year, the Panel is pleased particularly by the following areas by which ARTICLE 19 strengthens its accountability towards external and internal stakeholders:

   1) The cloud-based project management, planning and tracking system (“CAMMS Sycle”) will allow for total organisational visibility to review progress against strategic objectives – including the so-called business intelligence suite which will be accessible to donors for them to directly review progress.

   2) The financial management suite “Access Dimensions” will allow all finance staff to view all accounting and budgeting information in real time for all offices (vs. quarterly reporting).

   3) The approach to online platforms for policy development which increases accountability to stakeholders who can directly comment and receive responses on ARTICLE 19’s policy documents.

The Panel encourages ARTICLE 19 to share these useful practices and lessons learnt with the wider Accountable Now membership – e.g. via a webinar session or [blog text](#).

Finally, the Panel is interested to learn more about the development of the independent platform used to submit feedback to the UN...
Office of the High Commissioner for Human Rights. How will this work in practice to hold states accountable for their actions?

**Material Changes**

The Panel would like to congratulate ARTICLE 19 on its new six-year strategy; the Expression Agenda (see video [here](#)). This was developed in 2015 and encompasses five themes, all cross-cut by ARTICLE 19’s new approach to sex, gender and sexuality (the Mx Method): Civic Space, Digital, Media, Protection, and Transparency. In particular, the first and last theme are crucial when strengthening accountability and legitimacy. Moreover, the Panel looks forward to hearing more on the new system for monitoring progress in the 2016 report.

**Evidence**

ARTICLE 19 is sure that current developments with regard to the new project management process will help to coherently and more timely identify, track and analyse the degree to which the organisation involves the people it serves (e.g. target groups, change agents, and partner institutions). Thus, they are confident to provide better evidence in the future which is also better shared among offices throughout the organisation. However, the Panel underlines that it is not only necessary to involve people but to also ensure positive and sustainable change with and for them. The mentioned impact focus will thus be relevant in future Panel assessments.

The Panel appreciates the described plans to create an integrated approach to HR and project management and looks forward to progress and implementation in the next report.

**PERFORMANCE INDICATORS**

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**V. Responsible Management of Impacts on Society**

| SO1 | Managing your impact on local communities
| Addressed |

The Panel well understands that due to the nature of ARTICLE 19’s high-level policy and advocacy work, it can be challenging to clearly illustrate and evidence the direct impact access to information can have on the lives of individual people. It is appreciated that the organisation continuously improves its ability to do this systematically, e.g. through the described developing case study approach (“pathway to change”) or regular contextual analyses (PESTLE). Based on these developments, the Panel looks forward to hearing more in future reports on how specifically ARTICLE 19 assesses the degree to which their work has made direct or indirect impact (i.e. changes in freedom of expression or enhanced access to information due to their activities).

In addition, previous reports have provided interesting case studies of impact at the community level. The Panel invites ARTICLE 19 to share similar examples for 2015 in this interim report.

| SO3 | Anti-corruption practices
| Addressed |

As also described for NGO9, ARTICLE 19 is currently developing a new integrated HR approach, including introducing anti-corruption training as part of inductions and capacity building for staff. Please provide an update in the next full report – in particular, whether the low number of 1.6% of staff having received external training in 2015 could be improved. Such training should be mandatory for almost all staff. It is positively noted that anti-corruption trainings in Senegal were successful. Information on how these anti-corruption trainings have so far improved ARTICLE 19’s resilience to fraud and bribery (with regard to the new financial management system) would also be appreciated.

Moreover, has ARTICLE 19 increased its low target (coverage of just 8% of staff in 2015)? The Panel urges ARTICLE 19 for more immediate action.

The Panel recognizes that ARTICLE 19 is in the process of website redesign, and hence there is currently no link to Accountable Now, fraud and bribery policies. The Panel would urge a more positive commitment to this disclosure than the latest report suggests (namely that these reports “can be made available in future”).

Finally, ARTICLE 19 demonstrates illustrative examples and evidence how staff concerns raised (i.e. reimbursement for travel expenses or expectations from interns) were resolved satisfactorily.