Amnesty International
Independent Review Panel Feedback
Accountability Report 2015
Review Round November 2016
Dear Salil Shetty,

Thank you for submitting your Accountability Report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to continuously strengthen your 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 Digital 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 Amnesty International:

Amnesty International’s ninth report is very good, comprehensive and includes several Good Practice examples. The report features strong institutional commitment via the opening statement by Salil Shetty, Secretary General of Amnesty International, which highlights how the Global Transition Programme deepened their understanding of the link between impact and accountability.

In terms of the reporting boundary, Amnesty reports on behalf of the whole movement which is facilitated by their Core Standards and Standard Action Reports. The report is generally based on very strong evidence including on the engagement of and coordination with stakeholders, workforce, gender diversity, complaints, expenditures and CO2 emissions.
Amnesty continues to demonstrate **Good Practice** in the areas of the reporting process (3.5) for their systematic and comprehensive collection of information from their national entities, assigning areas of improvement for senior directors and integrating these areas in the Minimum Standards for project development and in the Impact and Learning System. The Panel commends Amnesty for clearly describing the content and nature of mechanisms for internal stakeholders to provide recommendations or direction to the highest governance body (4.4) and for transparently and thoroughly outlining the process of compensation for members of the highest governance body, senior managers and executives (4.5).

Amnesty has taken a proactive approach to developing and embedding participatory practices throughout all aspects and phases of their work to ensure involvement of affected stakeholders groups (NGO1), and their self-reflection and analysis of trends demonstrates their understanding of needing to implement such practices in an iterative manner. Advocacy positions and public awareness campaigns (NGO5) demonstrate the strength of Amnesty’s approach and programmes and the high degree of stakeholder engagement in developing their strategy, advocacy positions and campaigns including exist strategies.

Amnesty is also praised for their local hiring procedures (EC7) for recruiting 93% of their directors locally which is paramount to ensure the healthiness of the local economy. Also, one area that has high potential for good practice is programme monitoring, evaluation and learning (NGO3) with the new Impact and Learning System requiring external feedback from their partners to monitor and evaluate progress and impact.

Amnesty’s **weakness areas** include mechanisms for feedback and complaints (NGO2) and the Panel urges Amnesty to have a dedicated page for complaints on their website and would like to understand the reason why the page was removed. Gender and diversity (NGO4) continues to be a weakness as the number of entities that have plans in this area is very low. Also, global talent management (LA12) continues to be a weakness as only 54% of staff across national entities received performance reviews. Nevertheless, the Panel welcomes the appointment of a Learning and Development Manager in 2016 and looks forward to progress in this regard. Amnesty has substantial mechanisms to raise grievances (NGO9) but unfortunately there is no evidence provided that concerns raised were resolved satisfactorily. These areas are highlighted in this year’s **Improvement Analysis** which serves as the baseline for the next year’s interim accountability report.

In their redesigned website, Amnesty still has a [dedicated page](#) for the INGO Accountability Charter which is featured prominently under the ‘How we’re run’ section but unfortunately the (new) [Accountable Now logo](#) has not been uploaded to the website despite this having been raised by the Panel in their last feedback letter.

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 25 January 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
Cover Note on Amnesty International’s Accountability Report 2015
Review Round November 2016

PROFILE DISCLOSURES

I. Strategy and Analysis

1.1 Statement from the most senior decision-maker

*Fully addressed*

The report features a strong opening statement by Salil Shetty, Secretary General of Amnesty International, which highlights how the Global Transition Programme deepened their understanding of the link between impact and accountability. The statement refers to the new Impact and Learning System which invites feedback from external stakeholder groups.

II. Organisational Profile

2.1 - 2.7 Name of organisation / Primary activities Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience

*Fully addressed*

As a worldwide movement of voluntary membership, Amnesty is comprised of independent legal entities, the International Secretariat, international network, affiliates and members. The International Secretariat fulfils research, advocacy, campaigning and communication roles and coordinates global and regional work.

The International Secretariat works through a distributed model of 14* regional offices and a range of national entities in 69 countries (*11 of the regional offices are currently operating and offices in Tunisia and East Jerusalem are to open before the end of 2016 and in Jakarta in early 2017). The International Secretariat has presence in Geneva, New York, Washington DC, Madrid, Paris and Oslo. The Global Strategy 2016-2019 was adopted by the International Council and includes one goal on holding human rights abusers accountable.

2.8 Scale of organisation

*Fully addressed*
Amnesty reports a total of 7.8 million members with 52% coming from Europe. Amnesty attributes a decrease in their membership growth rates to the Americas mainly Brazil and Mexico (after a 2014 peak) and notes that South Africa and Ghana amongst the top ten fastest growing entities. The Panel commends Amnesty for increasing their reach to women to 52% (compared to 40% in 2014). Amnesty reduced the number of published reports (104 reports in 2015 compared to 140 reports and 131 shorter documents in 2013) because of the renewed focus on outcomes rather than outputs and the more strategic usage of other tools such as statements, online actions and advocacy missions. Moreover, Amnesty gives examples from their SOS Europe campaign and the Urgent Action Reports (UAs) to demonstrate how the new structure is enabling agility and effectiveness in response to emerging human rights issues.

2.9 **Significant changes**  
*Fully addressed*

Amnesty continues with their Global Transition Programme which is envisaged to end in early 2017. Amnesty further reports on changes within the Secretariat which includes establishing a new global Directorate for Engagement and Fundraising.

2.10 **Awards received**  
*Fully addressed*

The Panel praises Amnesty for being awarded the best non-profit website as part of the User Experience UK awards.

### 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*

Amnesty reports on behalf of the whole movement and is again commended for a systematic and comprehensive collection of information from their national entities’ reporting mechanisms (Standard Action Reports and Core Standards). Senior directors are assigned areas of improvement and meet twice every year to discuss progress. At the same time, areas of improvement are integrated in the decision making process by including them in the Minimum Standard for project development and in the Impact and Learning System. Findings of the Panel’s last feedback was presented as part of the State of the Movement Report in 2015 and
were also shared with the entire movement at several online and offline occasions. Amnesty’s approach continues to be considered by the Panel as Good Practice.

| 3.6 – 3.7 | **Report boundary / Specific limitations**  
Fully addressed |
|-----------|--------------------------------------------------|

| 3.8 | **Basis for reporting**  
*Fully addressed*  
Standard Action Reports (SARs) are submitted by national entities and continue to be one of the main sources for this report. The current report is based on SARs from 68 entities (compared to 64 in 2013) which represent 99% of the movement’s entities. Financial data in this report is generated from the quarterly financial updates by Amnesty’s national entities. Amnesty states that the SARs are also used for governance purposes and is to be commended for a reporting process where the single report (SAR) serves multiple purposes and thus limits the imposition of reporting to the regional and national entities. |

| 3.10 – 3.12 | **Changes in reporting parameters / Reference table**  
*Fully addressed* |

### IV. Mission, Values, Governance, and Stakeholder Engagement

| 4.1 | **Governance structure**  
*Fully addressed*  
The highest levels of accountability reside in the International Council and the International Board. The International Secretariat and International Board carried out a self-assessment during the reporting period, the results of which were shared with the movement. An external verification of the Core Standards has been piloted in 2015 and the findings were used to introduce some correctives measures in some entities such as clarifying the role of the Director in relation to the elected Board, developing Human Resources policies and procedures and global risk management. Since the governance structure of Amnesty is based on the democratic principle, voting rights have been subject to intensive debate and a final decision on the adopted voting system will be made in the International Council Meeting in 2017. |

| 4.2 | **Division of power between the governance body and management / Independence of Board Directors**  
*Fully addressed* |
Good information is provided on the Amnesty website.

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<th>4.4</th>
<th>Feedback from internal stakeholders</th>
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<td><strong>Fully addressed</strong></td>
<td>Amnesty continues to be commended for having the Board accessible to Members and for guaranteeing several internal spaces for interaction with the Board which is essential for their democratic set-up. Amnesty clearly describes the nature and content of engagement with constituents and notes that 17 resolutions were presented for decision and discussion. The Panel considers this as <strong>Good Practice</strong>.</td>
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<th>4.5</th>
<th>Compensation for members of highest governance body</th>
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<td><strong>Fully addressed</strong></td>
<td>A clearly described, transparent and thorough process illustrates how the organisation's salaries are being set. The International Board’s Remuneration Committee reports the information required by the International Council with regards to transparency of compensation and the data is compiled in-line with the UK’s National Council for Voluntary Organisations recommendations. Amnesty followed-up on the feedback of the Panel on the last full report and shared a linked to their annual statutory accounts including senior management remuneration. The Panel considers this as <strong>Good Practice</strong>.</td>
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<th>4.6</th>
<th>Conflicts of interests</th>
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<td><strong>Fully addressed</strong></td>
<td>The conflict of interest and conflicts of duty policy applies to all decision-makers within Amnesty International, including the International Board. The avoidance of any conflict of interest is a compliance requirement of the Core Standards adopted at the 2013 International Council Meeting. This policy has been in force for ten years and is part of leadership induction programmes.</td>
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<tr>
<th>4.10</th>
<th>Process to support highest governance body’s own performance</th>
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<td><strong>Fully addressed</strong></td>
<td>The Panel takes positive note of the refined Competency Assessment Framework set up to ensure the right mix of skills of the International Board which guided co-opting a Board Member with expertise in digital engagement. The Panel further acknowledges the self-assessment of Board Members and the collective goals set for the next two years on impact, governance reform, growth and the Global Transition Programme.</td>
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4.12 **Social charters, principles or other initiatives to which the organisation subscribes**

Not addressed

The Panel would appreciate more explanation from Amnesty on why this is not addressed.

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<th>4.14 – 4.15</th>
<th><strong>List of stakeholders / Basis for identification of stakeholders</strong></th>
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<td></td>
<td>Fully addressed</td>
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**PERFORMANCE INDICATORS**

**I. Programme Effectiveness**

**NGO1**

**Involvement of affected stakeholder groups**

Fully addressed

Engagement of rights holders and human rights defenders takes place through online and offline meetings, project planning and project review discussions. The Panel notes that 79% of all projects report involving rights holders mainly through consultation during project planning or implementation and with a lesser frequency (22%) in the whole project cycle (compared to 17% in 2013). Amnesty has taken a proactive approach to developing and embedding participatory practices throughout all aspect and phases of their work, and their self-reflection and analysis of trends demonstrates their understanding of needing to implement such practices in an iterative manner. They demonstrate that they are collecting organisation-wide data to inform their approaches, and indicate that participation has generally increased since 2011. They have a good understanding of where practice and analysis needs to be deepened and improved such as understanding the link between stakeholder participation and impact, and the nature of participation at different phases of work.

The Panel notes positively Amnesty’s observation that there is a positive trend towards a more participative culture across their range of activities and provides examples of **Good Practice**. However, the Panel is interested in the reasons for the disparity of levels of participation reported here with the high level of stakeholder engagement (91%) by national entities as reported in the Interim Accountability Report 2014.

The Panel further commends Amnesty for their diversified capacity building approaches with on content-appropriate participatory approaches, and appreciated the inclusion of examples, particularly the example from Amnesty...
India on how participation of communities on the local level can maximise impact.

**NGO2**  
**Mechanisms for feedback and complaints**  
*Partially addressed*

Amnesty is commended for providing this overview about filed and resolved complaints and the summary of nature of complaints received. However, the Panel would welcome information on the geographic distribution and nature of unresolved complaints in addition to the quality assurance and timeliness of resolved complaints. Also, the Panel would like a more detailed breakdown of the complaints received by Members/supporters/volunteers as the percentage of resolved complaints seems the lowest since 2011 (63%). Is the apparent low level of complaint resolution in 2015 (compared with previous years) due to some 2015 complaints are still under consideration?

The Panel considers this as a weakness area urges Amnesty to dedicate a complaints page on the redesigned website that links to the Complaints policy and would like to understand the reason why the complaints page was removed from the website. Having a well-known and functioning complaints mechanism is paramount to ensure accountability – and the only minimum standard for Accountable Now membership. The Panel understands how complaints handling can be resource intensive but the Panel deeply believes that this should be handled differently and not by removing the complaints page until things are clarified. Moreover, as requested in the 2013 Accountability Report, the Panel would be interested in evidence that overall assessment of received complaints has led to corrective decisions or improvements in the quality of Amnesty’s work.

In addition, the Panel notes the negative feedback on the fundraising approach of Amnesty USA on the Great Nonprofits platform and it appears there was no response to address the persisting issues over a two-year period. The Panel requests Amnesty to investigate this issue and to report on how it was addressed by Amnesty USA in the next report.

**NGO3**  
**Programme monitoring, evaluation and learning**  
*Fully addressed*

The Panel welcomes the newly established Impact and Learning system to accompany the Strategic Goals, with a focus on impact, outcome mapping and stakeholder engagement. The new system features the feedback of internal and external stakeholders including partners and links project level programming and financial forecasting. This will help Amnesty assess their contributions towards the five Strategic Goals on a quarterly basis in order to be able to decide on corrective actions in a timely manner. Also, projects are
to complete an annual impact review along with partners in order to identify their most significant change which will be used to inform regional and global impact assessments. External independent evaluations continue to be undertaken of the major focus work areas which fed the discussions of the Management Team Week in 2015.

The Panel welcomes sharing the lessons learnt from the evaluations internally with staff via meetings and externally as planned via the SPARK blog. The Panel looks forward to the main findings of the evaluation of the global Integrated Strategic Plan 2010-2015 and to more progress on this issue which is of high potential to be Good Practice.

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<th>NGO4</th>
<th>Gender and diversity</th>
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<td>Partially addressed</td>
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<td>The Panel welcomes Amnesty’s Strategic Goal 2 ‘Securing Equal Rights For All’ and appreciates their work to address gender and diversity through the ‘My Body My Rights’ global campaign and the different streams of related work at the national level including in Norway, Ireland and Morocco.</td>
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<td>The Panel recognises Amnesty’s self-awareness about the need for more progress in this area and commends their reflection and identification of steps to improve gender and diversity approaches throughout their programs. Amnesty also notes a need to better integrate gender and diversity practices in their organisational culture, and reports a slight reduction from 26% in 2013 to 24% in 2015 of national entities without measures or plans in place. However, beyond establishing a Working Group and submitting to standards awards, Amnesty has not identified the internal steps to address the issue.</td>
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<td>The Panel considers this as a weakness area and urges Amnesty to review and identify steps to strengthen their approaches and to hopefully identify steps or targets to be able to report against in future reports. The Panel looks forward to more updates on the Equality, Diversity and Inclusion (EDI) Working Group and to the results of the assessment by the National Equality Standards Award.</td>
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<th>NGO5</th>
<th>Advocacy positions and public awareness campaigns</th>
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<td>Fully addressed</td>
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<td>This demonstrates the strength of Amnesty’s approach and programmes. They describe a very thorough process of internal and external stakeholder engagement, both online and offline, in developing their global strategy 2016-2019. Exit strategies are developed for project work including for the two Global Campaigns of the previous operational plan 2014-2015. For new and controversial issues, the whole movement is engaged and decision is made at</td>
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the International Board level which was the case with Amnesty’s position on the decriminalisation of sex work policy. The Panel considers this as **Good Practice**.

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<th>NGO6</th>
<th><strong>Coordination with other actors</strong></th>
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<td><strong>Addressed</strong></td>
<td>Amnesty gives examples on how they strive to coordinate with other actors on the global level via for e.g. co-chairing the <a href="#">Transparency, Accountability and Participation for 2030 Agenda Network</a> and on the regional level via engaging with regional inter-governmental mechanisms and bodies in Africa. Amnesty is increasingly playing a convening role for other local groups and almost all of their national entities (99% in 2015 compared to 86% in 2013) have processes in place to coordinate with other actors, including local partners. While only 22% of Amnesty entities involve partners in the complete project cycle, the Panel recognises this as improvement compared to 11% in 2013. The Panel praises efforts by Amnesty to improve/deepen their coordination and engagement with partners/stakeholders, which includes the development of the ‘Activism Manifesto’ for Amnesty International and undertaking trainings on the importance of participation. The Panel looks forward to the results of the assessment of the Global Transition Programme in relation to improved coordination of stakeholders.</td>
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<th>NGO7</th>
<th><strong>Resource allocation</strong></th>
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<td><strong>Fully addressed</strong></td>
<td>Amnesty’s main income stream comes from their members and individual donors. Controls are adopted by national entity boards in accordance with national legal requirements and internal policies. Copies of financial statements and auditors’ management letters are collected by the International Secretariat to ensure compliance of national entities. Amnesty followed-up on the Panel’s request and shared a link to their <a href="#">global financial report</a>. The Panel looks forward to more information on the roll-out of a common financial reporting mechanism across the entire organisation and how this has led to better resource allocation and/or controls.</td>
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<th>NGO8</th>
<th><strong>Sources of Funding</strong></th>
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<td><strong>Fully addressed</strong></td>
<td>The large majority of Amnesty’s income comes from small, individual amounts given by members of the public. Funding sources and income distribution remained consistent with a small growth in total income from 2014-2015. Five major donors with donations over €0.9m were recorded.</td>
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### III. Environmental Management

| EN16 | **Greenhouse gas emissions of operations**  
**Fully addressed**  
The Panel praises Amnesty for reducing their Scope 2 (office) CO\(_2\) emissions to near the 2011 levels. The International Secretariat (London office) accounted for around 52% of all reported Scope 3 (travel) emissions for 2015 which did not increase significantly as the International Council Meeting was held in Dublin, Ireland. However total emissions which increased from 2014-2015 were mainly travel related. The Panel looks forward to more progress in this regard. |

| EN18 | **Initiatives to reduce emissions of operations**  
**Addressed**  
Amnesty focuses on reducing their future emissions via the refurbishment of their London office which will be finished at the end of 2016 and which was submitted for a Ska Rating (aimed at limiting the impact of the refurbishment itself) – with a targeted Bronze award. Also, staff awareness including in the regional offices have commenced but there is still a need to have coherent, joined up guidance or policies. The Panel would have appreciated an update on the number of entities that has environmental impact plans (56 out of 61 had no such plan in 2013) and looks forward to more progress. |

| EN26 | **Initiatives to mitigate environmental impact of activities and services**  
**Fully addressed** |

### IV. Human Resource Management

| LA1 | **Size and composition of workforce**  
**Fully addressed**  
The answer provides very comprehensive insights for the last five years in a graphical overview. The number of volunteers continued to decrease (2,889 in 2015 compared to 4,455 in 2013 and 7,722 in 2011), and staff continued to increase (8.2% in 2015). The Panel would welcome more explanation why the number of volunteers decreased and is interested in whether Amnesty has any insights into or concerns about the decreasing number of volunteers, and the impact this has on activities. |

| EC7 | **Procedure for local hiring**  
**Fully addressed**  
Amnesty reports impressively that 93% of directors have been recruited locally and the Panel would like to understand whether this includes expats recruited locally. Amnesty is generally commended for seriously aiming at not
undermining the local public sector by their hiring practices via conducting local salary benchmarking exercises. This continues to be seen as **Good Practice**. The Panel looks forward to more updates on how moving employees on the same salary scale as part of their commitment to ‘One Amnesty’ is done in a way that does not harm the local economy.

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| **LA10** | **Workforce training**  
**Addressed**  
A comprehensive and succinct overview is provided on Amnesty’s training offers and the average hours of training that staff members receive. Online trainings are now key in order to accommodate the decentralised structure of Amnesty which was enabled by the development of an e-learning platform (Totara) and the Learning Management System (LMS), launched in May 2016 which will allow a better overview of all trainings provided. Training priorities included the Leadership Development Programme for middle-management and cultural awareness trainings.

While Amnesty states that personnel development needs are identified in annual appraisal and a systematic approach to determining training, the Panel still believes that the question from the last full report is valid: how training needs are systematically identified in regard to fulfilling Amnesty’s strategic goals and which percentage of the overall administrative budget is invested into training the organisation’s workforce? |
| **LA12** | **Global talent management**  
**Partially addressed**  
In 2015, 54% of staff across national entities and 93% at the International Secretariat received performance reviews (compared to 53% and 89% in 2013 respectively). The Panel would like to understand the reasons behind the disparity between the International Secretariat and the national offices and continues to consider this as a weakness area. Nevertheless, the Panel welcomes the appointment of a Learning and Development Manager in 2016 and looks forward to progress in this regard. Also, the Panel refers Amnesty to the **Good Practice collection** (pages 106-108) by Accountable Now Members on global talent management. The Panel notes no mentioning of the career development reviews in this report and wonders if this was integrated with the performance reviews. |
| **LA13** | **Diversity of workforce and governance bodies**  
**Fully addressed**  
Comprehensive information is given on the diversity in governance bodies which demonstrates statistical evidence that Amnesty’s workforce is overall fairly diverse in terms of gender, age and national origin. The Panel |
commends Amnesty’s self-reflection on the need to include more young people (below 25 years old) in their governance bodies who for e.g. represented only 9% of participants at the International Council Meeting and are only 14% of their current workforce. From 2016 onwards, the annual employee engagement survey will include diversity and inclusion related questions to better track the staff diversity on an annual basis. Amnesty achieved 70% on the National Equality Standard scheme and will be reassessed in September 2016. An Equality, Diversity and Inclusion (EDI) working group is engaging staff in preparation for this assessment.

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<th>NGO9</th>
<th><strong>Mechanisms to raise grievances</strong></th>
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<td><strong>Partially addressed</strong></td>
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<td>Amnesty has substantial mechanisms for formal and informal grievance including via the whistle-blowing policies and ample opportunities during directorate meetings, staff council and all staff meetings. From across the movement, there are examples of staff associations working with management, direct channels of feedback to the board, escalation in progressive levels from line manager to senior management and the board, annual appraisals, and satisfaction surveys. Grievance cases are monitored and are discussed annually by the Senior Leadership Team.</td>
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<td>Unfortunately though, there is no evidence provided that concerns raised were resolved satisfactorily and the Panel considers this a weakness area.</td>
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<th>SO1</th>
<th><strong>Managing your impact on local communities</strong></th>
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<td><strong>Fully addressed</strong></td>
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<td>Amnesty does not provide services to communities, and therefore the impact of its work requires a different understanding of impact. In order to understand the nature, scope and effectiveness of their interventions and impact on communities, they have adopted robust processes. One of the key ones is to assess and manage global risks through risk registers that are managed by the International Secretariat and the national entities and which are used to inform the Finance and Audit Committee and the International Board. The top five 2016 global risks concern fundraising, lack of coordination, low research quality, implications of the sex worker policy and loss of institutional knowledge. The Panel is interested in understanding how local-level risks on individuals or groups are identified and mitigated collectively with concerned stakeholders.</td>
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<td>Amnesty also utilises an interim and (upcoming) final assessment of their new Global Transition Programme to assess the effectiveness and efficiency of programs through the new regional structures. What wasn’t apparent to the</td>
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Panel was the nature of feedback received from communities as part of these processes, and how this informed Amnesty’s decision making.

| SO3 | **Anti-corruption practices**  
|     | *Fully addressed*  
|     | Amnesty reviewed and re-issued the original anti-bribery and corruption policy and uploaded new training and guidance materials. Amnesty continues their efforts to raise awareness in the area of anti-bribery and corruption via trainings relevant staff members and by delivering presentations at the International Chair’s Assembly and Directors’ Forum. Amnesty further continues to review and update the original risk assessment in the area of anti-bribery and corruption, including on a quarterly basis as part of the global risk management processes. |

| SO4 | **Actions taken in response of corruption incidents**  
|     | *Fully addressed*  
|     | No specific incidents were formally reported according to the anti-bribery and corruption policy during 2015. Amnesty gave an example on an alleged bribery case in Sierra Leone but an independent investigation said there was insufficient evidence to verify the allegations of bribery or corruption. |

| VI. Ethical Fundraising |  
| PR6 | **Ethical fundraising and marketing communications**  
|     | *Fully addressed*  
|     | No complaints have been received by the International Secretariat in 2015 on complaints or breaches in regard to fundraising or communication activities. The global fundraising strategy commenced in January 2016. The Panel would appreciate a link to the new policy in the next full report. |