15 June 2012

Dear Salil Shetty,

We are writing to you as members of the Independent Review Panel of the INGO Accountability Charter, in order to give you feedback on the Report which you submitted for the reporting deadline in April 2012.

We would like first of all to thank you for your participation in this exercise and to recognise the commitment to accountability that this demonstrates.

Our approach to assessing the reports which we have received has been to focus on three dimensions in particular:
- How **complete** is the report in relation to the guidelines used?
- How strong is the **evidence** given for the self-assessment that each organisation has conducted?
- What evidence is there of **institutional commitment** to greater accountability and to using the reporting process to advance it?

On **completeness**, we acknowledge the demanding nature of many GRI requirements and recognise that not all of them are as material as others. In particular for smaller organisations, some requirements may be overly demanding. Nevertheless they give good guidance and we have attached a note that goes through the shortfalls against the reporting template in detail. In addition we have highlighted below areas where we felt, in particular, that your organisation could improve as well as other areas which we considered as strengths in your report.

On **evidence**, we looked in particular for references not only to relevant policy documents, but also to examples where the self-assessment was supported by specific action (for example, drawn from operational activities, whether successful or unsuccessful). It is important for us to see that the accountability commitments that you made when signing the Charter, lead to informed corrective action and ultimately improve the quality of your work.

On **institutional commitment**, we looked for evidence of top-level ownership of the report (for example in the opening statement signed by the Chief Executive); of using the report as a means of identifying areas of relative strengths and weaknesses in the organisation (as opposed to a box-ticking exercise); and of a systematic concern with accountability, including recognition of areas for further work. We would hope that progress in such areas would be high-lighted in future reports.

Since we first started assessing the reports we have noticed a **marked improvement in quality** and an improved commitment to accountability. However we have highlighted some common **areas for improvement,** in particular the indicators related to the environment (EN16, EN18), diversity and ethnicity (NGO4, LA13), how findings from programme evaluations have influenced internal learning and future decisions (NGO3), training in anti-corruption policies (SO3) and complaints handling mechanism in place (NGO2).

With regard to the **complaints handling mechanism**, we would like to remind Members that it is now a mandatory requirement for Charter Members to have such a mechanism in place. This is at the core of good accountability.

Regarding **diversity and ethnicity**, we would like to encourage Members to think about who is likely to be excluded from their work and programmes.

With regard to the generally weak reporting on **anti-corruption policies**, we would like to encourage Members to use the Anti-Bribery Checklist and Anti-Bribery Principles and Guidance for NGOs produced by Transparency International available under the following web-links: http://www.transparency.org.uk/attachments/046_NGO_Anti-bribery_Principles_and_Guidance.pdf and http://www.transparency-se.org/TI-ABC-20-point-anti-bribery-checklist.pdf In case of specific interest you may also contact Stan Cutzach at Transparency International under scutzach@transparency.org

In many reports Members just noted that they have the relevant policies in place but we feel that **more examples** of the policies in practice would be useful. Only when it is supported by evidence does the policy come to life and its usefulness can then be assessed.

Finally a word on the presentation. We value **succinctness and accessibility**. In some reports access to relevant information is made difficult by a lot of immaterial information being given at the same time. Please try and include only the essential information.

An interesting way of improving accessibility was chosen by some organisations, who integrated the accountability report into their annual report and gave links to the relevant indicators in a GRI table. To ensure a greater link between the **Charter commitments** and GRI reporting (focussing on transparency) we would like to emphasise our support for the Charter Board decision that all future reports should have a clear link between the Charter principles and the reported actions.

Please note that as a Panel we feel that part of our role is to encourage organisational improvement. To that end we are enclosing, for your information some examples of what we believe to be **Good Practice** in responding to some individual indicators, based on the GRI framework. This document consists of examples from all reports reviewed thus far and has been sent as an attachment to you per email. We would like to encourage you to look at this document as we feel this will be a good learning exercise for all Members to learn from each other.

Organisation-specific feedback to Amnesty International
*The report is of very good quality, it is positive that you have taken into consideration the feedback from the previous round. The report is very **complete**, however in terms of **evidence**, we feel more examples should be provided. There is a clear **institutional commitment;** which is shown in the opening statement and also by the seriousness with which this report has been written. We see your global sustainability programme of work as comprehensive and ambitious, and we look forward to hearing more about its development in future reports (indicator EN18). Although it is positive that your organisation offers anti-corruption training, we have noted that only a small percentage of staff attended this training.*
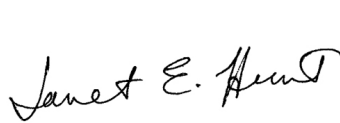
*We see your answers on the following indicators as **Good Practice**, in particular for other large organisations:*
- *1.1: Statement from the most senior decision-maker of the organisation about the relevance of sustainability to the organisation and its strategy*
- *Section 2: Organizational Profile*
- *EN18: Initiatives to reduce greenhouse gas emissions and reductions achieved.*
- *LA13: Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.*
- *Scope of the report: we appreciate that your report covers the international organisation in its entirety.*
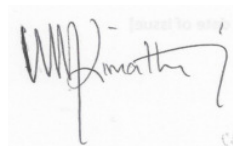
Our intention is that this letter, and any response that you may wish to provide, should be made publicly available on the Charter website, along with your organisation's report. You can find the reports that were reviewed previously on the Charter website under the section Charter Members/Member Reports. However, should there be errors of fact in the feedback above or in the more detailed note below on conformity with the reporting framework, we would of course wish to correct these before publication.

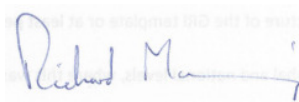Should you have any comments we would appreciate a response by **13 July 2012**.
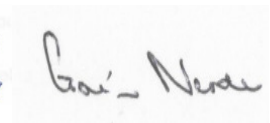

Yours sincerely,

| Janet Hunt | Wambui Kimathi | Richard Manning | Gavin Neath |

1st Review Round 2012
Note on Accountability Report

Organisation: Amnesty International
Reporting period: Calendar Year 2010

What GRI reporting level did the organisation report on?
☐   A
☐   B
☒   C

Did the Secretariat contact the organisation for further information before forwarding the report to the panel?
☐   Yes
☒   No
Comment: -

COMMENTS ON THE INFORMATION PROVIDED IN THE REPORT

Profile (recommended 28)
Number of Profile components the organisation reports on in total: **28**
Number of the recommended Profile components the organisation reports on: **28**
Number of additional Profile components the organisation reports on: **0**

Profile	Comments
Strategy and Analysis	
1.1*	*Comment from previous report: Missing information on key events/ achievements/ failures; performance with respect to goals, objectives, standards and/or targets; and an outlook on future challenges. Missing information regarding the author of this statement.* Comment from this report: Fully addressed. The organisation indicates which feedback from last year has not yet been taken into consideration and the reasons for this. Some of the events mentioned are outside the reporting period.
Organisational Profile	
2.1*	Fully addressed
2.2*	Fully addressed
2.3*	*Comment from previous report: Missing information on field offices and main divisions.* Comment from this report: Fully addressed.
2.4*	Fully addressed
2.5*	Fully addressed
2.6*	Fully addressed
2.7*	Fully addressed
2.8*	*Comment from previous report: Missing information on number of employees and volunteers.* Comment from this report: Partially addressed. No additional information on the number of employees and volunteers was

	provided under this component in this report. However, these figures can be found under indicator LA1.
2.9*	Fully addressed
2.10*	Fully addressed
Report Parameters	
3.1*	Fully addressed
3.2*	Fully addressed
3.3*	Fully addressed
3.4*	Fully addressed
3.5*	Fully addressed
3.6*	Fully addressed. The organisation indicates that unless stated otherwise the report covers the entire organisation.
3.7*	Fully addressed
3.8*	Fully addressed
3.10*	Fully addressed
3.11*	Fully addressed
3.12*	Fully addressed
Governance, Commitments, and Engagement	
4.1*	*Comment from previous report: Missing information on further committees under the highest governance body.* Comment from this report: Fully addressed.
4.2*	Fully addressed
4.3*	Fully addressed
4.4*	Partially addressed The report does not identify topics raised via the mechanisms mentioned during the reporting period.
4.14*	Fully addressed
4.15*	Fully addressed

*: Recommended Profile components

Indicators (recommended 18)
Number of indicators the organisation reports on in total: **18**
Number of the 18 recommended indicators the organisation reports on: **18**
Number of additional indicators the organisation reports on: **0**

Indicators	Comments
Program Effectiveness	
NGO1*	*Comment from previous report: Good Practice* Comment from this report: Fully addressed The organisation indicates that it has put together a working definition of active participation in order to provide a benchmark against which the integration of active participation in all of their work can be assessed.
NGO2*	Fully addressed
NGO3*	*Comment from previous report: Missing information on adjustments made as a result of mechanisms in place and on how this has been communicated.* Comment from this report: Fully addressed Some concrete examples of adjustments would strengthen this section. The

	organisation indicates that it is still working on Key Performance Indicators mentioned in the previous report and that it will report on the progress in the next report.
NGO4*	*Comment from previous report: Missing information on policies/ norms/ standards related to diversity; on tools for diversity analysis; and on measures to integrate these issues into programmes. The organisation indicates that it is working on a road map to ensure competency with addressing diversity.* Comment from this report: Partially addressed More information is provided in this report than the previous one, including information on the steps the organisation is taking to improve diversity. However, the report does not identify standards or norms. The organisation has now adopted the Gender Action Plan and Road Map for Diversity mentioned in its previous report.
NGO5*	*Comment from previous report: Missing information on the process for corrective adjustment of advocacy positions; on corrective actions taken; and on the process for exiting a campaign.* Comment from this report: Partially addressed This report includes more detailed information on the process for corrective adjustment of advocacy positions than the previous one. However, it does not provide information on the process for exiting a campaign. In addition, concrete examples of corrective actions taken are not provided.
NGO6*	*Comment from previous report: Missing information on requirements to identify potential duplication of the efforts of the work of others; on processes to promote learning from the work of others; and on the process to identify opportunities for partnerships with other organisations.* Comment from this report: Partially addressed More information is provided in this report than the previous one, including information on requirements to identify potential duplication of the efforts of the work of others and on the process to identify opportunities for partnerships with other organisations. However, the report does not provide information on formal processes to promote learning from the work of others.
Economic	
NGO7*	Fully addressed The organisation reported on the new Resource Allocation Mechanism developed in 2010 and 2011.
NGO8*	Fully addressed
EC7*	*Comment from previous report: Missing information on the proportion of senior management in significant locations of operation from the local community.* Comment from this report: Partially addressed More information is provided in this report than the previous one. However, the numbers provided are vague.
Environmental	
EN16*	*Comment from previous report: Missing information on standards used for calculation; and on emissions divided in direct and indirect emissions. The organisation indicates that only parts of the organisation were able to provide this data for the reporting period and that only office energy use and business travel was tracked.*

	<u>Comment from this report:</u> Fully addressed The organisation indicates that not all the national entities reported on their emissions.
EN18*	<u>*Comment from previous report:*</u> *Missing information on reductions achieved. The organisation indicates that it plans to launch a global environmental sustainability policy in 2011.* <u>Comment from this report:</u> Fully addressed As mentioned in the previous report, the organisation is designing a global sustainability programme of work which is comprehensive and ambitious.
Labour	
LA1*	<u>*Comment from previous report:*</u> *Missing information on exact number of employees, on employees broken down by contract type, full-/part-time status and regional base; and on total number of volunteers, on volunteers broken down by contract status, working frequency and contract type. The organisation indicates that it plans to start collecting more detailed information on staff and volunteers during 2011.* <u>Comment from this report:</u> Partially addressed More information is provided in this report than the previous one, including more detailed information on staff. However, it does not provide much information regarding volunteers. The organisation indicates that it plans to start collecting more detailed information on volunteers in 2012.
LA10*	<u>*Comment from previous report:*</u> *The organisation states that it does not collect this data on a global level and therefore only reports for the international secretariat. The organisation reports on training programmes in place.* <u>Comment from this report:</u> Partially addressed More information is provided in this report than the previous one. However, the information is not broken down by employee category/volunteer and the hours of training for the whole organisation are not included. The organisation indicates that it will start collecting training hours globally in 2012.
LA12*	<u>*Comment from previous report:*</u> *The organisation states that it does not collect this data on a global level and therefore only reports for the international secretariat. This data will be collected globally starting in 2011.* <u>Comment from this report:</u> Fully addressed
LA13*	<u>*Comment from previous report:*</u> *Missing information on the total number of employees in each employee category; on the percentage of employees broken down in minority groups; and on percentage of individuals in governance bodies broken down in age/ minority groups. The organisation states that the information provided for gender and age for board members and staff is based on parts of the organisation.* <u>Comment from this report:</u> Fully addressed

Society	
SO1*	*Comment from previous report: Missing more detailed information on programmes in place for assessing impacts of operation prior to, while operating and while making decisions to exit a community; on how data is collected and community members selected for such programmes; on the number of operations to which the mechanisms apply; on whether the mechanisms have been effective; and on how feedback has led to further community engagement.* Comment from this report: Partially addressed More information is provided in this report than in the previous one. However, it does not include information on the number of operations to which the mechanisms apply, on whether the mechanisms have been effective, or on how feedback has reshaped policies/programmes. The organisation indicates that it is developing an impact assessment toolkit and that it is seeking to improve the planning and implementation of its exit strategy.
SO3*	*Comment from previous report: The organisation states that it does not collect this data on a global level and therefore only reports for the international secretariat. This data will be collected globally starting in 2011.* Comment from this report: Partially addressed The organisation provides a percentage but it does not break down the figure per management and non-management employees.
Product Responsibility	
PR6*	*Comment from previous report: Missing information on the frequency with which the organisation reviews compliance with its standards.* Comment from this report: Partially addressed The report does not include information on the codes or standards applied across the organisation however, it is mentioned that national entities are encouraged to adhere to local standards. The organisation indicates that it will review its global fundraising policies and procedures in 2012.

*: Recommended indicators

Organisation's commitments for the future
- **1.1** and **NGO3**: "One of the areas we have not addressed is key performance indicators (KPIs) and corresponding targets for the Integrated Strategic Plan (see 2.2 below). We have drafted these KPIs and are in the process of defining global targets for the rest of the Integrated Strategic Plan in place until end 2015. We are planning to roll this out in 2012 and we will report our progress on this in our next report to the Charter."
- **NGO1**: "As part of its on-going efforts to greater stakeholder engagement, we will be looking into more participatory research methods as well as developing and adapting general participatory methodologies and tools for mobilization of rights holders."
- **NGO4**: "We will be hiring a project manager in 2012 to coordinate the implementation of both the Gender Action Plan and the Roadmap for Diversity."
- **NGO7**: "The International Executive Committee will undertake an interim evaluation in early 2013 of this resource allocation mechanism to ensure it is operating as planned"
- **EN18**: "We, as a movement, are currently designing a global sustainability program of work. We are aiming to (1) gain an accredited carbon reduction, energy efficiency award; (2) demonstrate commitment to efficiencies, reductions and awareness with new annual goals; and (3) build staff awareness and involvement in sustainability issues."

- **LA1**: "We did not collect volunteer/intern composition information (full-time vs. part-time, length of service) last year as we focused on staff composition first. We will collect volunteer/intern composition information in 2012 for our next GRI report."
- **LA10**: "We currently do not collect training hours globally and plan to start doing so in 2012 for our next GRI report."
- **SO1**: "We will be developing an impact assessment toolkit, which outlines our principles and methodologies to measure and improve the impact of our work." "One area of work where we need to improve on is regarding the planning and implementation of exit strategies. We have started to think about these in advance of a campaign or project coming to an end; and in fact it is an aspect that project plans now have to detail before the project even starts."
- **PR6**: "We also decided to review our global fundraising policies and procedures and this is a priority for 212".