

15 June 2012

Dear Katsuji Imata,

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](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](mailto: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 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 CIVICUS

*The report has improved from the previous round and is of good quality particularly considering the size and resources of your organisation. In terms of **completeness**, it is acknowledged that you attempted to address all the required indicators. Regarding **evidence**, we would welcome more concrete examples. We can see in the opening statement that your organisation is **committed to accountability** and the reporting process, which is positive. It is positive too that you have a whistleblower policy in place, however we would like to remind you that Charter Members are now requested to have a complaints handling mechanism for internal and external complaints. We have noted that you do not have an anti-corruption policy and we would recommend introducing one. Where policies are required it is not sufficient to note that compliance is achieved without a policy in place. It is important that any practice is not reliant on certain people in the organisation, but on institutional commitment which is captured in written processes.*

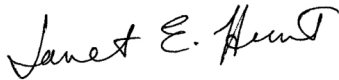
*We see your answers on the following indicators as **Good Practice**, in particular for other small organisations:*

- *NGO4: Measures to integrate gender and diversity into program design and implementation, and the monitoring evaluation, and learning cycle.*
- *NGO7: Resource allocation*
- *NGO8: Sources of funding by category and five largest donors and monetary value of their contribution.*

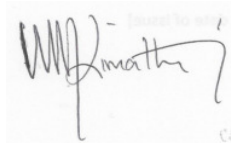
Our intention is that this letter, and any response that you may wish to provide, should be made publicly available on the Charter website, along with your organisation's report. You can find the reports that were reviewed previously on the Charter website under the section Charter Members/Member Reports. 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**.

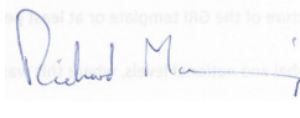
Yours sincerely,



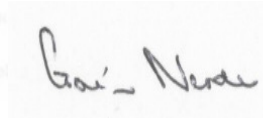
Janet Hunt



Wambui Kimathi



Richard Manning



Gavin Neath

## 1<sup>st</sup> Review Round 2012 Note on Accountability Report

Organisation: CIVICUS  
Reporting period: January- December 2011

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: 29

Number of the recommended Profile components the organisation reports on: 28

Number of additional Profile components the organisation reports on: 1

Profile	Comments
<b>Strategy and Analysis</b>	
1.1*	<i>Comments from previous report: Missing information on performance with respect to goals/ objectives/ standards/ targets.</i>  <u>Comments from this report:</u> Fully addressed
<b>Organisational Profile</b>	
2.1*	Fully addressed
2.2*	Fully addressed
2.3*	Fully addressed
2.4*	Fully addressed
2.5*	Fully addressed
2.6*	Fully addressed
2.7*	Fully addressed
2.8*	<i>Comments from previous report: Missing information on scope/ scale of activities.</i>  <u>Comments from this report:</u> Fully addressed
2.9*	Fully addressed
2.10*	Fully addressed
<b>Report Parameters</b>	
3.1*	Fully addressed
3.2*	<i>Comments from previous report: Information regarding date for most recent previous report is not correct.</i>  <u>Comments from this report:</u> Fully addressed

3.3*	Fully addressed
3.4*	Fully addressed
3.5*	<i>Comments from previous report: Good Practice</i>  <u>Comments from this report:</u> Fully addressed
3.6*	Fully addressed
3.7*	Fully addressed The organisation indicates that, due to its limited resources, it does not currently have all the information necessary to report fully on all indicators.
3.8*	Fully addressed
3.9	Fully addressed
3.10*	Fully addressed
3.11*	Fully addressed
3.12*	Fully addressed
<b>Governance, Commitments, and Engagement</b>	
4.1*	Fully addressed
4.2*	Fully addressed
4.3*	Fully addressed
4.4*	<i>Comments from previous report: Good Practice</i>  <u>Comments from this report:</u> Fully addressed
4.14*	<i>Comments from previous report: The organisation indicates that it does not have a complete list of stakeholders but is taking action to develop a strategy to complete one.</i>  <u>Comments from this report:</u> Fully addressed
4.15*	<i>Comments from previous report: The organisation indicates that it does not have a complete list of stakeholders but is taking action to develop a strategy to complete one.</i>  <u>Comments from this report:</u> 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
<b>Program Effectiveness</b>	
NGO1*	<i>Comments from previous report: Missing more detailed information on the processes for involvement of stakeholders in all parts of policies and programs, how this is communicated; and on how feedback from stakeholders has reshaped policies/ procedures.</i>  <u>Comments from this report:</u> Partially addressed More information is provided in this report than the previous one. However, it does not include evidence on how decisions and decision making processes are communicated or how feedback from stakeholders has reshaped policies/ procedures. There is no link provided to the Impact Planning and Learning Framework where this information might be provided.

NGO2*	<p><u>Comments from previous report:</u> Missing information on mechanisms for assessing complaints and for determining what actions are required in response to complaints.</p> <p><u>Comments from this report:</u> Partially addressed More information is provided in this report than the previous one. The organisation indicates that it does not have a formal complaints handling mechanism because it only receives few formal complaints, however it has a whistleblower policy in place. The organisation is reminded that Charter Members are now requested to have complaints handling mechanism for internal and external complaints.</p>
NGO3*	<p><u>Comments from previous report:</u> Missing information on how the mechanisms in place are communicated; on adjustments made as a result of these mechanisms; and on how this has been communicated. The organisation indicates that it will be able to see the effects of its newly introduced framework during 2011.</p> <p><u>Comments from this report:</u> Partially addressed More information is provided in this report than the previous one. However, it does not include evidence regarding adjustments made as a result of these mechanisms or how these adjustments are communicated.</p>
NGO4*	<p><u>Comments from previous report:</u> Missing information on policies/ norms/ standards in place related to diversity; on tools for diversity analysis; and on actions taken to achieve diversity goals. The organisation indicates that further diversity issues, other than gender, have not been in focus.</p> <p><u>Comments from this report:</u> Fully addressed</p>
NGO5*	<p><u>Comments from previous report:</u> Missing information on the current process for arriving at advocacy positions; on the process for corrective adjustment of advocacy positions; on corrective actions taken; on where public awareness and advocacy positions are published; and on the process for exiting a campaign.</p> <p><u>Comments from this report:</u> Partially addressed More information is provided in this report than the previous one. However, it does not include concrete example of corrective actions and does not provide information as to where the campaigns and positions are published or the process used for exiting a campaign.</p>
NGO6*	Fully addressed
<b>Economic</b>	
NGO7*	Fully addressed
NGO8*	<p><u>Comments from previous report:</u> Good Practice</p> <p><u>Comments from this report:</u> Fully addressed</p>
EC7*	Fully addressed
<b>Environmental</b>	
EN16*	<p><u>Comments from previous report:</u> The organisation indicates that it does not collect this data and therefore cannot report on this.</p> <p><u>Comments from this report:</u> Partially addressed The report contains a very rough estimate of emissions. The organisation indicates that it has committed itself to calculating and monitoring emissions, which it started doing at the end of 2011.</p>

EN18*	<p><u>Comments from previous report:</u> <i>The organisation indicates that it just started working on this and therefore is not yet in a position to report on reductions.</i></p> <p><u>Comments from this report:</u> Partially addressed The organisation indicates that it has only just implemented a policy to monitor “trends” in emissions and that it plans to develop an approach to reducing emissions in the coming months.</p>
<b>Labour</b>	
LA1*	<p><u>Comments from previous report:</u> <i>Missing information on contract type and full-/part-time status for employees; and on full-/part-time status for volunteers. The organisation indicates that it does not collect data for employees broken down by region.</i></p> <p><u>Comments from this report:</u> Partially addressed More information is provided in this report than the previous one. However, it does not include information on contract type or full/ part-time status of employees and volunteers. The organisation indicates that it does not have a breakdown of the workforce from different regions.</p>
LA10*	<p><u>Comments from previous report:</u> <i>Missing information on average hours of training per year per employee. The organisation indicates that no formal training and development programme existed during the reporting period.</i></p> <p><u>Comments from this report:</u> Partially addressed As in the previous round, information regarding the average hours of training within each employee category is not included. The organisation indicates that in 2012 it will develop a new training programme which will enable better reporting on the average hours per training per staff.</p>
LA12*	<p><u>Comments from previous report:</u> <i>Missing information on the percentage of employees receiving a formal performance appraisal.</i></p> <p><u>Comments from this report:</u> Fully addressed</p>
LA13*	<p><u>Comments from previous report:</u> <i>Missing information on the total number of employees in each employee category; and on the percentage of employees and individuals in governance bodies broken down in minority groups/ age. The organisation indicates that it does only gather data for gender.</i></p> <p><u>Comments from this report:</u> Partially addressed More information is provided in this report than the previous one. However, the report does not provide details on the whole workforce. The numbers and percentages given regarding the gender breakdown of the Senior Management team do not match. The organisation indicates that it does not currently gather full data on staff.</p>

<b>Society</b>	
SO1*	<p><i>Comments from previous report: Missing information on programmes in place to define how data is collected and community members selected for the 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.</i></p> <p><u>Comments from this report:</u> Partially addressed More information is provided in this report than the previous one. However, it does not include information on how data is collected, whether the mechanisms are effective and how feedback has led to further community engagement. It is understood however that the organisation does not have direct contact with communities and therefore cannot necessarily provide in-depth information on this point.</p>
SO3*	<p><i>Comments from previous report: Missing information on the percentage of employees who have received anti-corruption training. The organisation indicates that it does not have an anti-corruption policy.</i></p> <p><u>Comments from this report:</u> Fully addressed The organisation indicates that it does not have a specific anti-corruption policy.</p>
<b>Product Responsibility</b>	
PR6*	<p><i>Comments from previous report: Missing information on the number of complaints submitted against the organisation. The organisation indicates that it does not adhere to any standards or voluntary codes related to this.</i></p> <p><u>Comments from this report:</u> Fully addressed The organisation indicates that it does not formally adhere to any standards or voluntary codes related to fundraising and marketing communications. However, they have developed a Resource Mobilisation Policy in line with the Charter, but no link or detailed information regarding this policy has been provided.</p>

\*: Recommended indicators

### Organisation's commitments for the future

- **NGO1:** "CIVICUS is careful to provide continuous such opportunities for input, and in 2012 will launch a Strategy and Leadership Survey to choose the criteria for a new Secretary General, as well as a broader global consultation to set the new 2013-2017 Strategic Directions."
- **NGO2:** "In 2012, CIVICUS plans to improve its ways of capturing qualitative and quantitative feedback, and is developing simple, light and cost-effective ways of taking the pulse of how its constituents experience CIVICUS as an organisation."
- **NGO4:** "At the end of 2011, CIVICUS began to widen its scope of work around diversity issues, and is looking forward in 2012 to strengthening its annual Youth Assembly, with the possible development of a youth initiative emerging from the 2012 Assembly which will encourage better inclusion and mainstreaming of youth in CIVICUS programming."
- **EN18:** "CIVICUS hopes in the coming months to develop an approach for reducing its emissions as well as monitoring them."
- **LA10:** "In 2012, CIVICUS will implement across the organisation as a new training programme the Culture of Learning strategy, which will develop new ways for staff to learn from each other within a tight financial environment. This should also enable better reporting for 2012 on the average hours of training per staff."