

15 June 2012

Dear Jeremy Hobbs, Robert Fox, Ariane Arpa, Barry Coates,

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 Oxfam

To all four Oxfam Organisations

As mentioned last year, we see that reporting on a national as well as an international level is a reasonable approach for your organisation as some of your national entities are quite large and diverse. However we would recommend that you compile one joint report for the entire organisation in the foreseeable future to make the information more accessible and meaningful with regards to the entire movement.

To Oxfam International

*The report is very good, very **comprehensive** and informative. We see clear signs of **institutional commitment** and appreciate the visibility given to the Charter in your report. We understand that you cannot fully report on local hiring or fundraising (indicators EC7 and PR6). However the indicator NGO2 on mechanisms for feedback and complaints is an area for improvement as more information on your complaints handling mechanism could be provided. With regards to **evidence**, the report includes a lot of examples which is positive. However it would be good to have more information on your formal policies. If you do not want to integrate these into your annual report, you can reference them with a hyperlink.*

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
- NGO1: Processes for involvement of affected stakeholder groups in the design, implementation, monitoring and evaluation of policies and programs.
- LA13: Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.
- Format of the report: The fact that the accountability report is merged with the annual report allows more visibility for the accountability report.

To Oxfam Canada

The report is very good, **comprehensive**, and shows good **institutional commitment** to accountability and transparency. Good **evidence** is included in the report. The mechanisms for feedback and complaints (indicator NGO2) are well reported on, however more examples would be useful. It is positive that 100% of your staff has attended an anti-corruption training course. It would be good to get some more information on what such a training course includes. The provision of the number of complaints for breaches of standards for fundraising (indicator PR6) is honest and open.

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

- 4.15: Basis for identification and selection of stakeholders with whom to engage.
- NGO2: Mechanisms for feedback and complaints in relation to programs and policies and for determining actions to take in response to breaches of policies.
- NGO3: System for program monitoring, evaluation and learning, (including measuring program effectiveness and impact) resulting changes to programs, and how they are communicated.
- LA10: Average hours of training per year per employee by employee category

To Intermón Oxfam

The report has improved from the previous round. It is **comprehensive** and includes more **evidence** and good examples. We see good signs of **institutional commitment**, in particular commitment to stakeholders. Some of the sections are quite long and too much information is provided. We recommend keeping your report more concise. We welcome the creation of an ombudsman and look forward to hearing more about how it works in practice in future reports.

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

- 2.9: Significant changes during the reporting period regarding size, structure, or ownership
- NGO5: Processes to formulate, communicate, implement, and change advocacy positions and public awareness campaigns
- NGO8: Sources of funding by category and five largest donors and monetary value of their contribution.
- EC7: Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.

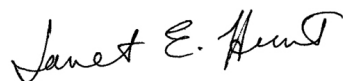
To Oxfam New Zealand

The report is considerably improved from the previous round. Good progress has been made towards **completeness**. You have supplied much more **evidence**, however more examples could be provided to support your accountability commitments. We appreciate that you have taken into consideration our feedback from the last round and see some **institutional commitment** in this report. However the opening statement could be stronger, more strategic and show a stronger commitment to accountability. You indicate that your organisation does not have a specific anti-corruption training programme in place because this has not been identified as a significant issue. However your organisation works in countries where corruption has proven to be a problem. We therefore encourage you to implement such a policy and training programme.

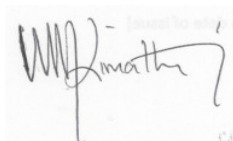
Our intention is that this letter, and any response that you may wish to provide, should be made publicly available on the Charter website, along with your organisation's report. You can find the reports that were reviewed previously on the Charter website under the section Charter Members/Member Reports.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

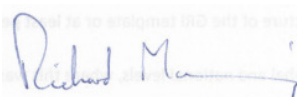
Yours sincerely,



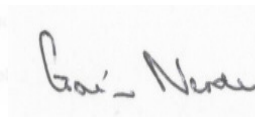
Janet Hunt



Wambui Kimathi



Richard Manning



Gavin Neath