

To the Independent Review Panel of
Accountable Now

22 September 2017



Dear Members of the Independent Review Panel,

Many thanks for your feedback letter regarding our submission of the Accountable Now Report for 2015-16.

We agree with the identified overall trends and challenges and wish to add that our [new Strategic Plan 2017-2022](#) includes a third Strategic Goal on empowering a more accountable, effective and innovative civil society. In this regard, one of the aims is that more civil society actors will be testing new tools and approaches that could transform the ways that they work, including the use of citizen-generated data and constituency feedback loops; thus, also supporting indicator NGO2. Better collaboration shall ensure that Southern, smaller and informal civil society formations will have better access to resources that support their resilience (NGO6). Overall, we hope to support building greater levels of public trust in civil society – also by showing the positive impact that CIVICUS has on people’s lives (NGO3).

We exist to
strengthen citizen
action
and civil society
around the world

We aim to implement your recommendations in next year’s report and provide more details on the following pages about our actions already taken or planned for the identified improvement areas. I am particularly pleased that CIVICUS was praised for its efforts to increase local hires (EC7) as a commendable example of good practice.

We are delighted to be engaged in Accountable Now’s [pilots around people-powered decision-making](#) with our Youth Action Team. Moreover, I look forward to continuing our collaboration on dynamic accountability and transparency issues affecting civil society with you. We are especially excited about the new reporting framework of Accountable Now and will report based on the new indicators going forward. Many thanks for your support.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "D. Sriskandarajah".

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IMPROVEMENT ANALYSIS CIVICUS RESPONSE SEPTEMBER 2017

FEEDBACK AND COMPLAINTS HANDLING (NGO2)

The Panel appreciates that CIVICUS actively invites feedback from a multitude of stakeholders, through various means (e.g. the Annual Constituency Survey, event feedback forms, and project evaluations). The results of the Annual Constituency Survey (the [link](#) provided is to the 2015 survey, rather than 2016) are published in CIVICUS' Annual Report. It is noted positively that findings from these feedback channels are incorporated into annual planning processes, internal reviews and external evaluations.

Reference is made to managers "following correct procedure" in dealing with external complaints "as per CIVICUS' code of conduct". A link to the relevant document would be appreciated.

However, there is still no formal feedback and complaints handling mechanism in place, which is mandatory for all Accountable Now Members (see [membership criteria](#)). A formal policy and well evidenced practice on this indicator is also the basis to qualify for the biannual reporting cycle. Work on an external complaints policy began in spring 2016 and is expected to be implemented "in time for the launch of the 2017-2022 Strategic Goals" (when this will be, was not indicated). It will be interesting to see how this mechanism is promoted. Other Accountable Now Members such as Sightsavers have recently introduced commendable Feedback and Complaints Policies. It is suggested to get in touch with them for peer advice.

A complaints logging mechanism, referred to in CIVICUS' previous report, due to launch by end-June 2016 as part of the new CRM, was not mentioned in this report. The Panel would appreciate further information on this.

ACTIONS TAKEN

CIVICUS is aware that a well set-up complaints and feedback mechanism is a great tool for management and Board, and we are taking steps to develop this. For example, as part of an in-house brown bag lunch on data collection, the newly established Monitoring, Evaluation, Learning and Accountability Cluster trained staff on [how to close feedback loops](#) based on approaches from Keystone Accountability and Feedback Labs.

With regard to CIVICUS' policies and procedures for receiving and responding to external feedback and complaints received, CIVICUS staff has drafted a **Feedback Response Policy** (to be published online), a **Feedback Response Procedure** including a



logging mechanisms (for internal use), as well as on **online form for submissions**. This includes clear timelines, responsibilities and escalation steps. The policy and form will be translated into French and Spanish, too. Accountable Now's webinar on feedback (June 2017) and the reference to Sightsavers' example have been helpful in this process. However, these policies and documents have not been approved or implemented yet. We aim to have these in place in 2018, ideally before CIVICUS submits its next Accountable Now report.

As part of CIVICUS' new Strategic Goals, one of the aims is that more civil society actors will be testing new tools and approaches that could transform the ways that they work, including the use of citizen-generated data and constituency feedback loops; thus, contributing to the Accountable Now indicator NGO2.

Unfortunately, a link to the Code of Conduct cannot be shared publicly since this is an internal document, but we would be happy to share this document confidentially to the Panel.

GENDER AND DIVERSITY (NGO4) & DIVERSITY OF BOARD AND SENIOR LEADERSHIP (LA13)

It is positively noted that all CIVICUS' public positions are grounded in a gender and diversity policy (which unfortunately has not been linked again). CIVICUS' Gender Working Group, launched in 2015/16, is stated to guide and input into CIVICUS' work on gender. More specific examples of this beyond the networking opportunities and safe space listed, and initial results/value add of the group's work, would be of interest to the Panel.

The theme of CIVICUS' 2016 State of Civil Society report was inclusion, but unfortunately this report is not linked. An inclusion audit on all CIVICUS' internal policies and practices, including gender, was conducted and recommendations will be adopted in 2017 – a link to the audit's findings would be appreciated in the next report, as well as an update on implementation of the recommendations.

A new Youth Action Team (YAT) has been created to mainstream youth issues into CIVICUS' activities and provide strategic advice. This is an interesting initiative, and the Panel looks forward to a reflection on the YAT's achievements in this regard, with the inclusion of the first YAT introspective report in CIVICUS' next Accountability Report.

Unfortunately, some other points from the Panel's last feedback were also missing:

- Has CIVICUS set itself any targets for gender and diversity issues?
- Could CIVICUS link to the Gender and Diversity Scorecard mentioned in the 2013-2014 report?

Furthermore, it was again unclear what CIVICUS does to drive overall inclusion in their work beyond gender and youth. The Panel echoes its previous suggestion to implement systems to identify stakeholders that are potentially excluded from CIVICUS'



work due to e.g. disability, ethnicity, poverty, or illiteracy.

CIVICUS presents the composition of their workforce and Board according to age, gender and work base. Figures for Board Members are included in this report. However, information would be appreciated on other groups that might be excluded in the workforce and governance body (e.g. religious minority groups, people with disabilities). Furthermore, a written component to accompany the figures provided would allow CIVICUS to address the questions in the reporting guidelines more fully – particularly reflections on which groups should be represented in the workforce to improve its legitimacy and effectiveness, and the setting of targets for future improvements.

ACTIONS TAKEN

Gender equality, inclusion and participation are central to CIVICUS' values. One of the aims of CIVICUS' new Strategic Goal #3 is to increase the number of effective national civil society platforms across the globe by supporting the design and implementation appropriate diversity and inclusion policies and practices.

For our part, in the [2016 State of Civil Society Report](#), CIVICUS made the commitment to promote inclusiveness and confront marginalisation by starting with an internal audit of CIVICUS' internal policies and procedures. As a result, we engaged an external consultant to conduct a **Diversity and Inclusion Audit** that reviewed our policies and practice across a range of diversity criteria. Again, although this is an internal document, we would be pleased to share the report with the Panel. We also have an active internal **Gender Working Group** (GWG) that is helping to bring an intersectional lens and gendered perspective in the organisation's activities.

In response to the Audit findings, CIVICUS' new cluster structure and the management forums have created opportunities for more people in junior ranks to play leadership roles and act as spokespeople for CIVICUS. Going forward, other audit recommendations will be addressed in a planned manner and is one of the focus areas of a newly created Capacity Development Cluster Lead position. These recommendations include how we increase regional, linguistic and educational background diversity in our recruitment strategy. CIVICUS also strengthened our internal gender work, convening representatives from each programme stream and team to implement our vision of mainstreaming inclusion throughout the organisation.

As mentioned in the report, [CIVICUS' Youth Working Group](#) was launched in August 2016 grouping all CIVICUS members under 30 and youth organisations. During the 2016/2017 reporting period, the Youth Working Group grew to over 900 members, with about 20% being CIVICUS members. The intention of the group is to offer a dedicated space online to members to discuss important issues and to provide opportunities for young activists to strengthen their networks and create possibilities of partnerships and increase their knowledge about the sector. The agenda of this group is steered by the [Youth Action Team](#) (YAT), a group of eight young members from different regions and



backgrounds who are mandated to advise CIVICUS on how to meaningfully mainstream youth voices across the work of the alliance. During 2016-17, the YAT participated in advocacy initiatives at the United Nations Human Rights Council 33rd session and the OHCHR Forum on Democracy, Human Rights and Rule of Law. There were also immense networking opportunities through a Mentorship programme designed early in 2017 that saw over 270 members from over 70 countries participate in this non-formal learning exchange.

Also, as previously mentioned, several youth members were supported to attend international high level conference and civil society dialogues as an effort to empower youth voices in decision-making process and partnership-building opportunities like the Africa Youth Movement Global Conference (March 2017), Oceans Conference (June 2017), SPEAK! Design Thinking workshop (July 2017), and Environment Human Rights Defenders training (August 2017). Another example for the inclusion of youth voices into CIVICUS work, is also exemplified by the YAT which provided substantive feedback on the Strategic Goals 2017-2022.

As for diversity factors beyond gender and age, the Inclusion Audit suggested: "In order to be best practice organization, CIVICUS should introduce a written policy covering people with disabilities and workplace accommodations into its policy manual. This would serve to both reinforce a culture of inclusion and minimize potential inconsistencies in making accommodations that are currently done on an ad-hoc basis." Moreover, it was recommended to develop talent sourcing strategies to effectively recruit talent from under-represented regions as well as talent with diverse educational backgrounds and language skills outside of "UN languages".

GREENHOUSE GAS EMISSIONS (EN16)

CIVICUS has provided a more detailed explanation of their greenhouse gas emissions. Whilst the emissions for this reporting period were even higher than in the last report, the majority of these (89%) were due to long distance travel to the International Civil Society Week in Colombia. The use of solar power supply for 50% of the average work day is commended.

The Panel would again appreciate in the next report an overview of carbon footprint development over years in a way that depicts developments more clearly (e.g. in a table). Oxfam International provides a good example in [their reports](#).

ACTIONS TAKEN

CIVICUS considers "going green" vital to our ethos. As such, an **Environmental Management Framework** has been drafted which was referenced in our latest Accountability Report. To further refine the framework, CIVICUS' intention still is to embark on a participatory staff-led process but this has not happened yet.



Due to the reshaping process that took place as a staff priority within CIVICUS in early and mid-2017, discussion on drafting of the new environmental policy has been delayed for the year as the staff retreat focus has been on the new structure. In addition, CIVICUS is currently in the nominations process of supplementing the rotating Board of Directors with new members. Once these new members have been appointed (in early December 2017 at the International Civil Society Week), and the committees have been updated accordingly, the Operations Committee will be available to lead and advise the process of improving upon the existing environmental policy.

Similarly, the separate development of a **travel policy** (which will include measurement and control of the environmental impact of travel and events generated by CIVICUS) is in the pipeline and will be taken to the Board of Directors for approval in 2018. The environmental policy must be approved by the new Board before it can be referred to or included in staff policies. In the meantime, we often arrange conferences that bring together people from all over the world because convening is a central component to the work that CIVICUS engages in. Our “going green” ethos requires an understanding of the impact on the planet that these events have and as such we try as far as possible to mitigate this harm by organising ‘paperless’ events, contributing to carbon off-setting programmes, and holding alternative local and/or virtual events when possible. In addition, all CIVICUS-led events must adhere to the following **set of principles**: Sustainability, inclusion, diversity, equality, participation, and transparency.

Finally, **several measures have been taken in 2017 to lower the organisation’s environmental footprint**: When designing the new head offices located in Johannesburg, much care was taken with elements such as motion-sensor lights that switch off when rooms are empty to save electricity; a central water dispenser that regulates the boiling and cooling process using less electricity; preferential usage of local suppliers and manufacturers for office furniture where possible; close proximity to public transport for staff members; and so forth.

As for the future, we will ensure to provide a tabled an overview of our carbon footprint development over years in a way that depicts changes more clearly.

ANTI-CORRUPTION POLICIES (SO3)

As in the previous year, CIVICUS states that the two relevant documents are their Fraud Prevention policy and Information Privacy policy, but links are still missing to these documents (or to the Staff Handbook in which they appear). Evidence that these policies are known by staff and work in practice is required for the next report – this is critical in view of CIVICUS’ stated mission around giving a voice to communities.

CIVICUS also states in SO4 that they are informed by their external auditors annually on the latest fraud and corruption schemes as well as by their bankers on phishing schemes etc. Does this equal a systematic risk analysis on where CIVICUS’ work might be exposed to corruption? CIVICUS is advised to look internally at potential bad practices as corruption is an internal threat as well as an external one. Also, the Panel



refers CIVICUS to a [recent blog post on Accountable Now's website](#) which outlines the significant role of leadership in fighting corruption in the sector.

ACTIONS TAKEN

Unfortunately, links to the **Fraud Prevention Policy**, **Information Privacy Policy**, and the staff handbook cannot be shared externally. However, this is an excerpt from the Fraud Prevention Policy:

CIVICUS recognises a zero-tolerance policy regarding fraud and corruption. This policy covers everyone who works for or on behalf of CIVICUS. Additionally, this policy covers all CIVICUS vendors, customers and partners to the extent that any CIVICUS resources are involved or impacted. Fraud is defined as an intentional deception, misappropriation of resources or the manipulation of data to the advantage or disadvantage of a person or entity. The general offence of fraud is broken into three sections:

- *Fraud by false representation;*
- *Fraud by failing to disclose information; and*
- *Fraud by abuse of position.*

All matters raised by any source will be taken seriously and properly investigated, and should be reported to the Line Manager in the first instance.

All staff are required to familiarise with these policies and procedures as part of their induction process. Moreover, all staff must sign an updated **Conflict of Interest Declaration** on an annual basis and are thus regularly reminded of this issue and potential risks due to corruption and fraud.

Our auditors systematically analyse potential risks on where CIVICUS' work might be exposed to corruption. Following up on their recommendations, we have revised some of our policies to comply with the **UK Bribery Act**.

