Intemón Oxfam response to GRI comments:

Comment: In the report that was submitted to the Secretariat there was no information for components 2.1 and 2.2. This information was included in the second report that the organisation submitted.

RESPONSE TO COMMENT: the information concerning the components 2.1 and 2.2 under the Profile Section was in the first report, but the rows related were hidden. It was a simple mistake.

COMMENTS ON THE INFORMATION PROVIDED IN THE REPORT

“1.1 Strategy and Analysis/ Statement from the most senior decision-maker of the organisation.”
Comment: Missing information the on position of the author of the statement; on views on performance with respect to goals/ objectives; and an outlook on main challenges to come.

RESPONSE TO COMMENT
Key events during reporting period
In the 09-10 exercise the most relevant elements have been the following: the Single Management Structure (SMS) project, the response to the earthquake emergency in Haiti, the management control, the economic crisis and the review of the Intemón Oxfam organizational model.

The Single Management Structure project responds to the belief of all members of the Oxfam confederation joining our work under a single strategy and management structure in each country will result in a greater impact, ie contribute best to create a fairer world without poverty.

On January 12, 2010 an earthquake struck Haiti leaving 2 million people affected. The response from IO is the largest and more complex of our history. The objective was focused on the humanitarian needs related to water, sanitation and hygiene in Haiti and organize humanitarian corridor from Santo Domingo (Dominican Republic). 70,000 people are being attended by IO and 195 (between nationals and expatriates) have been mobilized to do it. Communication and advocacy were integrated from the outset as fundamental elements of our response. Impacts have been positive. As OI we have reached 20% of the affected population with quality work especially in the field of water and sanitation

Regarding management control, it seems important to emphasize once again the effort we have done to improve procedures, management and quality of information. Although there is still work to do.

The economic crisis is still leading in Spain and greatly affects our current and future context. It is a deep crisis and at the moment there is no clear horizon of recovery in the medium and long term. This crisis has been an opportunity to make an important reflection on the growth that has been occurring in Intemón Oxfam in recent years.

In this sense the Board of Directors has been working very strongly in the review of institutional organizational model. During the exercise 09-10 the discussion has been focused on the determination of nuclear activities and the organizational model in order to move towards the effectiveness, efficiency, flexibility, change and innovation. We expect to have a lighter structure appropriate to the real business needs and quickly and easily adaptable.

Main challenges for the 10-11 period.
During the 2010-2011 exercise, according to our Action Plan 09-11 and to the context analysis, we will pay particular attention to the analysis of the impact of the crisis upon the most excluded sectors; to support for the main social movements that may arise as a reaction to the crisis; and to analysing the different impacts that the situation has upon men and women as well as on humanitarian crises. Our added value as an organisation is to insist upon the consequences of the crisis upon Southern countries, while at the same time acknowledging their impact on Spanish society. We are faced with a receptive and favourable context in which to explain and to justify our working model.

From an internal point of view, the current economic environment reaffirms and speeds up the need for the implantation of some changes and confirms the priorities of our institution. The aim is to undertake a more thorough thought process in order to determine our core activities and the associated work and organisational models that will allow us to satisfactorily adapt to the context. In any case, there are three key domains that we do not want to abandon: the maximisation of the impact of our actions upon the target population, the strengthening of the Intermón Oxfam brand, and the quality and control of our management.

In terms of programmes and campaigns, Intermón Oxfam will continue working around five external goals: Economic Justice, Essential Services, Humanitarian Aid, Women’s Rights and Citizenship and Governance. Internally our activity will revolve around the following 3 items: Identity and institutional growth, People and processes and Impact, accountability and learning. These are the 8 axes included in our Strategic Plan 2007-2017. In relation to the last axe, we underline five main objectives for the biennium 09-11:

- Defining and improving the bases of the assessment and evaluation system, on an institutional level as well as concerning fair trade programmes, campaigns and activities.
- Implementing tools for the analysis of the progress made on the fulfilment of results and impacts to which we contribute for each of the external axes.
- Promoting the necessary changes to culture, responsibilities, systems and tools in order to integrate learning in the assessment and evaluation processes at institutional, departmental and personal levels.
- Implementing the institutional transparency and accountability policy.
- Ensuring that IO’s assessment, evaluation and learning process at institutional and departmental levels is in accordance with the requisites proposed by OI concerning assessment, evaluation and learning.

This Report should be read together with our Annual Report 2009-2010 (see http://www.intermonoxfam.org/es/page.asp?id=60).

As we mention in the following pages, this has been our first GRI report. Our commitment is to improve the quality and the quantity of information to provide in the next reports. We think it will be very useful for us in terms of improving the areas evaluated.

Ariane Arpa – Director General

“2.3 Organisational Profile/Operational structure of the organization, including national offices, sections, branches, field offices, main divisions, operating companies, subsidiaries, and joint ventures.

Comment: The website referred to does not exist in English. Missing information on reference regarding where to find the report referred to.

RESPONSE TO COMMENT:
We consider in this case the language of our website is not a criteria to qualify our transparency, accountability and the social responsibility.

However, here we attach more information about our structure.
Intermón Oxfam is a foundation governed by a Board of Trustees (see page 20 in our Report 2009-2010, available in English in our website), whose responsibility is to ensure the fulfillment of the organization’s objectives and above all, the consistency with the mission it has set. The Board of Trustees is composed of 15 members from various professional sectors and different regions of Spain.

They carry out their tasks on a fully voluntary basis, motivated by their solidarity and commitment to the objectives of IO. They are periodically renewed. The Board of Trustees selects one person to take responsibility for the General Management, which accounts for the executive leadership of Intermón Oxfam.

The Board of Directors is an executive organ of Intermón Oxfam and is composed by the people holding leadership positions in each department and in General Management (see page 20 in our Report 2009-2010).

The management team consists of those responsible for the different areas and departments of IO. These people hold leadership positions and manage their teams in order to achieve corporate goals.

The operating team consists of all those who have a stable commitment with Intermón Oxfam. We make up the different work teams: a) staff: someone who freely lends their professional services in exchange for salary; b) volunteers: someone who dedicates part of their time to collaborate with Intermón; c) occasional volunteers, these are people who collaborate occasionally in activities that do not require a stable commitment or integration in the organization; d) interns and trainees, someone who carries out activities related to what they are studying or have recently studied with the aim of acquiring practical training.

Intermón Oxfam is made up of 9 departments, counting General Management: Human Resources, International Cooperation, Fair Trade, Campaigns and Education, Communication and Marketing, Social Responsibility, Administration, Finance and I.T., and Territorial Department.

As it is mentioned in the 2.4 indicator, the main offices are in Barcelona, Madrid and Valence (Spain). There are 7 headquarters in Spain, 46 retail shops and 51 committees. Intermón Oxfam operates in 46 countries including our fair trade activity. See more detail in Report 2009-2010 (http://www.intermonoxfam.org/cms/HTML/espanol/60/101201_Memoria_2009-2010_INGLES.pdf, pages 16, 17 and 24).

“2.8 Organisational Profile/ Scale of the reporting organization.”
Comment: Missing information on scope/ scale of activities.

RESPONSE TO COMMENT:
Intermón Oxfam works in 46 countries including fair trade activity and cooperates in 93 programmes (2009-10) (43 Africa, 44 America and 6 in Asia) distributed between the following goals:
- 29 Economic Justice programmes (31% programme budget),
- 6 Essential Services programmes (5%),
- 33 Humanitarian Action programmes (36%),
- 10 Women’s Rights programmes (9%) and
- 15 Citizenship and Governance programmes (19%).

Our work reached 2.5 million people living in poverty and injustice.
In the fair trade area, Intermón Oxfam has invested more than 1.6 million euro in handicraft and food.

Concerning education, young people and activists:
- 1,379 schools and 2,120 teachers have joined Intermón Oxfam Educational programme for a global citizenship. The proposal Conectando Mundos (Connecting Worlds) had the participation of students in primary and secondary education in 17 different countries.
- 238 mobilization activities have been carried out, with the participation of 93,146 boys and girls, apart from the 3,500 digital activities in DaleLaVueltaAlMundo.org.
- 276 acts have been promoted in the street to raise public awareness about climate change and the Millennium Development Goals, where 80,988 people have collaborated.
- And 23 titles have been published, which expect to generate a positive debate on current subjects.

“3.5 Report Parameters/ Process for defining report content.”
Comment: The organisation here mentions to have reported on 10 indicators but the report contains information on 12. Missing information on the process for defining report content.

RESPONSE TO COMMENT
This is our first GRI report. We have tried to follow the NGO Working Group recommendations. Once we analysed the indicators, we chose those with whom we felt more comfortable to begin this process. However, in order to get better the level of our GRI reports, our commitment is to improve the quality and the quantity of information to provide in the next reports. The content has been worked by the Intermón Oxfam accountability team, together with people working in other departments.

We are very satisfied of preparing our first GRI Report. We think it will be very useful for us in terms of improving the areas evaluated.

We have chosen 12 indicators from the level C.

“4.15 Governance, Commitments and Engagement/ Basis for identification and selection of stakeholders with whom to engage.”
Comment: Missing information on how stakeholders are identified and selected.

RESPONSE TO COMMENT
Partners: Programmes defined and supported by Intermón Oxfam are multi-actor process. They define complex process of social and political change, which means that to influence them, multiple strategies are required, from advocacy, mobilization or raising awareness about Rights, to cultural changes. No single organisation can carry out a complete strategy. This leads us to work in partnership and to establish alliances with other organisations to achieve a greater impact collectively.

Program's strategies set up the adequate partners frame to run these strategies. The selection of this partners frame is done attending the following basic criteria:
- Role impact and analysis: Which are the added value and the capacity of each partner of the program to contribute to change achievements (in people’s life and in policies, practice, ideas and beliefs) as program targets?
- Coherence of partner and IO in vision, principles and approach. Which is the common understanding about situation, commitment and appropriation of the changes agreed in the program? Quality of the build up relationship.
- Partner reliability in terms of operation, organization, skills, representation, management, legal and financial, etc.
Criterions to select **people living in poverty for whom and with whom we work** depend on the type of programme. In any case criterions are agreed with partners involved in the programmes.

**Producer groups:**
The fair trade (FT) purchasing policy set up three sequential conditions for producer groups:
- **Necessary condition:** Producer groups we buy from must perform FT principles.
- **Sufficient condition:** FT items purchased ought to be easy to sell. That means that the articles selection has to match market requirements.
- **Excellent condition:** When possible, and if the benefit of the IO partnership trade activity is over 5% of the sale, FT purchasing will be guided towards producer groups doing better as they transform sales into development opportunities for their members. This condition, that is a compulsory condition to be applied only in good economic situations and desirable for the rest, shows the preference of buying from producer groups in less developed countries, having a more committed mission with rural, craft of workers families as well as women development or environmental preservation.

**Members and donors:** According to the Data Protection Act it is required to be adult or have parents or tutor authorisation to became IO donor and receive our communications.

Funding activities are developed directly into Spain country. In a reactive way some people could donate by internet.

** Relevant donors, corporations and foundations.** Donations coming from enterprises not observing our social responsibility code (http://www.intermonoxfam.org/es/page.asp?id=1731) are not accepted (this is some thing we are not able to check so this can be only our appreciation or its declaration). For important donations, we use the OI screening procedure (a standard criteria giving us good path about the acceptation decision).

**Staff:** Human resources requirements shall be met by ensuring that we dispose of the best person for the Institution; someone who identifies with and is committed to the mission, values and culture of IO and ensuring that they can accept the responsibility of the post. The Institution shall dispose of people whose skill profile enables them to develop the functions of the job and with the potential, versatility, commitment and identification with the Institution which are needed to ensure the promotion, continuity and achievement of the Organisation’s current and future objectives.

**Volunteers:** A volunteer is a person who willingly gives some time to collaborate with IO and does not get any kind of compensation for it. This way this people confirm their social commitment and contribute to the achievement of our mission and objectives.

Our volunteers are people who:
- Feel motivated by social help, international solidarity and the wish of changing the world.
- They feel very closed to our mission and share our values.
- They assume a steady commitment and dedication as well as a clear responsibility.
- They become members of our team, either in local offices, committees, fair trade shops or departments.
- They are trained in our institutional topics so they can do good work and better contribution to the IO mission.
- They have experience, expertise and interest in the works they will do for IO.
- They share reflections and internal debate spaces and act as awareness agents outside.

The incorporation of volunteers to the various teams depends upon the execution of definite activities. Prior to the incorporation, therefore, one must find out which new activity shall be
started or which activity requires new people. Based upon the analysis of volunteer requirements, a profile must be defined and a recruitment procedure must be started. The incorporation implies a selection process which ensures that the volunteer is adapted to the required post and/or functions, as well as allowing the organisation to verify motivation and possibilities of future integration.

“NGO1: Involvement of affected stakeholder groups in the design, implementation, monitoring and evaluation of policies and programs.”
Comment: Missing more detailed information on the processes of involving stakeholders at all stages; on how decisions are communicated to stakeholders; and on how feedback from stakeholders has reshaped policies/procedures.

RESPONSE TO COMMENT:
When defining a new program or priority in a country, we always involve a wide range of local organizations, authorities, representatives from the communities where we intend to work. We organize workshops and discussions to identify needs, best approaches, relevant actors and adequate practices. This type of participatory approach is also applied at the formulation stage of each individual proposal or project. Monitoring and evaluation is done in a way that also integrates our stakeholder opinions, demands and informs the next set of proposals and projects.

“NGO3: Systems for program monitoring, evaluation and learning (including measuring programme effectiveness and impact), resulting changes to programs, and how they are communicated”.
Comment: Missing information on how results from the mechanisms contribute to internal learning; on adjustments/changes that have been made; and on how these have been communicated.

RESPONSE TO COMMENT:
Information gathered from the MEL (monitoring, evaluation and learning) system, together with the learnings and experience of Programme Managers, is reflected into Program Annual Reports. An analysis of these Annual Programme Reports allows us to produce biennial Thematic Reports (one for each of our main strategic change goals; ie Economic Justice, Essential Services, Humanitarian Action, Women’s Rights and Governance and Citizenship). These Thematic Reports are key institutional documents to provide examples of good practices, areas of improvement, lessons learnt from each type of activity we undertake. Recommendations from these reports are then integrated in our planning for next biennial cycle, and our performance monitoring system (ABORÀ) verifies that each Programme Manager integrates in his/her planning, activities geared towards quality improvement following the Report recommendations.

“NGO4: Measures to integrate gender and diversity into program design, implementation, and the monitoring, evaluation, and learning cycle.”
Comment: Missing information on policies related to all types of diversity; and on actions taken in programmes to achieve gender and diversity goals.

RESPONSE TO COMMENT
Policies related to all types of diversity. According to our Social Responsibility Policy, Intermón Oxfam wishes to publicly assume its role as holder of duty in the promotion and respect of the rights of individuals and communities. In these sense Intermón Oxfam promotes the principle of non-discrimination:

We reject all types of discrimination for racial, sex, linguistic, religious, political, sexual, health (AIDS, handicaps, illnesses), or any other reasons. At IO we believe in people and in all that concerns their acknowledgement and respect. IO’s wish for its team to made up by men and
women without any discrimination for reasons of age, gender, sexual orientation, religion, language, ethnicity, nationality, social class, physical or mental health.

We value, respect and promote diversity, and attempt to act in an impartial and non-discriminatory manner in all our activities. To this end, we dispose of policies that promote diversity, equality and gender equality, impartiality and non-discrimination in all our activities, whether internal or external.

Actions taken in programmes to achieve gender and diversity goals. We include gender and diversity approach from the early stage of program definition through to implementation and monitoring. Mainstreaming gender into our program work is one of our institutional challenges and we are intending to increase resources and expertise towards this goal in the future months.

“NGO5: Processes to formulate, communicate, implement and change advocacy positions and public awareness campaigns.”
Comment: Missing information on the process for corrective adjustment of advocacy positions; on corrective actions taken; and on the process for exiting a campaign.

RESPONSE TO COMMENT:
Process for corrective adjustment of advocacy positions and public awareness campaigns
Intermón Oxfam follows the procedure established by Oxfam international, as largely our policy positions and campaigns are established and decided at Oxfam International level. For national policy issues or campaigns, our Policy teams or external actors raise concerns, we consult internally and externally as needed, and reformulate the policy that is then approved by the respective policy lead and advocacy director. Adjustments to campaigns are made more regularly and organically through the permanent campaigns management team, where progress is regularly assessed, changes in the context analysed and corrections proposed and agreed. Where a significant or sensitive course of direction is implied, the campaign lead raises this with the Campaigns and Policy Director in Intermón Oxfam for approval, who in turn may take it to the Intermón Oxfam Board of Directors if necessary because the shift implied is fundamental and raises communication, reputation or other risks.

Corrective actions taken at national level in Spain - examples
Cross-campaigns:
- We increased investment in digital campaigning and moving away from offline stunts due to the important changes in the way citizens relate and act (more online, less offline).
- Due to the important cuts on ODA proposed by the government we shifted our main campaign focus from OI’s agriculture campaigning to a national campaign to influence the Parliament to reduce those cuts in the final version of the budget.

Aid work
- We shifted energy to more national level campaigning when the Spanish Government announced important cuts in their ODA in May 2010, away from the global aid effectiveness agenda.
- We shifted emphasis from quantity of aid to quality of aid and strengthening the capacities of the aid system, in light of economic crisis and aid environment in Spain
- We shifted from focusing mainly in demanding more aid to focus on building public support in Spain for an FTT, given the financial crisis and budgetary constraints of the country.

Water Fund
- Our position was that Fund for Water and Sanitation in Latin America set up by the Spanish Government should not receive funding because of concerns about the tender
process and the impact of the projects. Once these concerns were adequately addressed, our position has shifted to advocate for the Fund to continue being funded.

Migration Campaign-Abriendo Mundos
- The campaign had an important focus on training migrant women working as domestic workers. We shifted the focus towards training and empowerment seminars for the women regarding advocacy and claiming their rights as the government hardened migration policies, in order for the women to be able to participate in debates and claim changes.

Publication of public awareness and advocacy positions
- Our main positions (Posiciones IO) are published on our website (http://www.intermonoxfam.org/es/page.asp?id=3621). However, some more concrete positions about particular events etc. remain internal, appearing in abbreviated form in public policy materials (briefing notes, briefing papers, campaign reports, lobby letters, technical notes, and media notes) that contain broader content.

Process for exiting a campaign
We have asserted principles that exiting a campaign should be preceded by: clarity of timeline for achievement of objectives, an exit strategy built into original plan, clear communication of this, advance notice to partners and allies and a clear plan for campaign sustainability (i.e., ensuring Oxfam’s absence does not permanently damage the campaign because Oxfam is supporting others to carry forward the next stage). In the past few years we have exited two campaigns: the Spanish section of the Global Campaign from Education and the Spanish Clean Clothes Campaign. In both cases we applied the abovementioned principles and have successfully exited without damaging neither the campaign nor our relationship with our partners. However, the principles have not yet been mapped into a systematic process.

“NGO6: Processes to take into account and coordinate with the activities of other actors. How do you ensure that your organisation is not duplicating efforts?”
Comment: Missing information on processes to promote learning from the work of other actors; and on the process to take into account and coordinate with the activities of other actors.

RESPONSE TO COMMENT
In its programs support IO tries to coordinate with other actors and their activities in two ways:
- On the geographical region: To make sure that partners coordinate with other national and non national actors in their local area.
- By topics: For example, Intermón Oxfam is part of the sectorial groups organized by the ministries or by UN organizations (WASH sector, sector Food Security, Mesa Agraria in Ecuador, international NGOs Coordinators in nearly all countries where we are present).

Studies and systematizations are also promoted to allow practice comparisons with other organisations. Two examples: KIC, (Knowledge Infrastructure with and between Counterparts) a project related to gender focus incorporation into sustainable livelihoods programs in Ethiopia, Brazil and Nicaragua; and exchanges promotion between partners in Burundi and Tanzania about cereals banks.

“EC7: Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation.”
Comment: Missing information on the definition used for “senior level”.

RESPONSE TO COMMENT:
Senior level is considered from the Programme Manager category.
“EN16: Total direct and indirect greenhouse gas emissions by weight.”
Comment: Missing information on standards used for calculation.

RESPONSE TO COMMENT:
Oxfam International Carbon Standard.

Status Approved by the Executive Directors of Oxfam International:
- The approach of Oxfam International to calculate the emissions of each affiliate should be very pragmatic and aim to accommodate everyone.
- Within OI, some affiliates have quite sophisticated systems for carbon reporting; some less so, some have none. Rather than replacing individual systems, the paper and templates prepared by OI is about establishing a common format into which the affiliate results can be consolidated and reported for the Confederation as a whole.
- In proposing where to set the organisational boundaries, OI have kept these tight in pursuit of consistency across the confederation. For that reason, carbon arising from travel to work, for example, has not been included in the minimum reporting requirement. However the approach also provides for individual affiliates to track other emissions and report these locally.
- In time OI would expect us to make our approach more rigorous, for example incorporating carbon offsets if we feel that may be appropriate.

Organisational Boundaries:
- OI Confederation will use the operational control approach to account for emissions, from all offices, shops and other premises in its home countries.
- The inclusion of overseas offices will, initially, be optional.
- There will be no accounting for emissions from partner organisations.

Operational Boundaries:
- OI Confederation will report the largest sources of emissions with the simplest data collection;
- Direct Emissions - Fuel use (vehicles, generators, boilers and other end-use equipment)
- Indirect Emissions - Purchased electricity & Air Travel
- (The operational boundaries have been kept tight to ensure consistency over the confederation. Individual affiliates are free to track other emissions and report these locally as required)

Data Collection System:
- OI Confederation will use a version of OGB’s Carbon Data Collection System, tailored to the requirements of the Confederation.
- The base year will be April 2009-March 2010. Thereafter, data will be collected for the OI Confederation’s financial year, April –March.

“EN18: Initiatives to reduce greenhouse gas emissions and reductions achieved.”
Comment: Missing information on reductions in emissions during the reporting period.

RESPONSE TO COMMENT:
In March 2010 in Intermon Oxfam we implemented for first time a carbon footprint evaluation system following the OI guidelines and standards. The first carbon footprint audit we have implemented was the one that measured our emissions from April 2009 to March 2010. We do not have information about our CO₂ emissions before April 2009. Therefore, we do not have information related to reductions in emissions during the reporting period (July 2009-March 2010), which is the same one as the one referred to our first carbon footprint audit.