

# Accountable Now

GLOBAL STANDARDS LOCAL TRUST



## European Environmental Bureau Independent Review Panel Feedback

Accountability Report 2014  
Review Round November 2016



# European Environmental Bureau

## Feedback from the Independent Review Panel

### Review Round November 2016

02 January 2017

Dear Jeremy Wates,

Thank you for submitting your Accountability Report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to continuously strengthen your accountability to communities, local partners, supporters, staff, donors, or other key constituencies. Our key focus is on accountability to those you serve. It is against this background that we critically discussed your report and came to the individual assessment below. Before we share this with you, however, we want to highlight a few issues of concern that we found throughout most of the nine reports assessed in the last review round.

### Closing the feedback loop with stakeholders (NGO2, NGO9)

A [recent study](#) on 40 international civil society organisations' (CSOs') accountability practices - conducted by the *direct impact group* on behalf of Accountable Now - revealed that only three out of these 40 CSOs responded with an appropriate answer to a complaint test within three weeks.

This is alarming. All Members of Accountable Now should have a fully functioning feedback mechanisms in place. However, when checking your reports we found a consistent lack of reporting filed complaints per type, quantity, and region as well as a total lack of information on how they were resolved. We believe this is not an acceptable level of accountability. CSOs should not only have a mechanism in place but should first be capturing complaints with the appropriate level of detail and then monitoring their resolution and agreeing what actions need to be taken to ensure the same issues do not arise.

[Feedback Labs](#), with whom Accountable Now collaborated on the [Digital Accountability project](#), also serve as a valuable source of information on how to close feedback loops.



## Collaboration with partners, communities and networks (NGO6, EC7 & SO1)

As part of the [10 Accountability Commitments](#), Accountable Now Members commit to working in genuine partnership with local communities and partners. With increased globalisation of information, more empowered citizens engage and civic space is challenged, it becomes ever more important to help local communities and partners to thrive. However, we found that coordination with local communities is still an overall weakness area among the Accountability Reports we received. Some “common” ICSO practices can have intended or unintended consequences on local communities. We would thus like to particularly highlight a lack of contributions to building local capacity and resources. Do you take into account local market conditions and think about working alongside local organisations building their capacity? We suggest that ICSOs should start to consider their impact on the sustainability and independence of local civil society in all their work (such as planning, budgeting, economic impact, etc.).

## Adding to what people do to improve their lives (NGO3)

To state the obvious, impact measurement is important. However, many evaluations mentioned in received Accountability Reports focus on collecting relatively large amounts of data on people reached, however, this does not tell us much about the improvement in their lives. Moreover, we should critically ask ourselves: What is the ICSO’s credit in this improvement and what positive impact is actually due to the people and beneficiaries themselves?

While we are of course aware that resources are limited, there is clearly no substitute for a robust and honest impact evaluation of our programmes and activities.

## Organisation-specific feedback to the EEB:

The European Environmental Bureau’s (EEB) third accountability report is quite comprehensive and is a slight improvement in comparison to previous reports. However, it is disappointing that few of the measures recommended by the Independent Review Panel in its 2014 review (and committed to by EEB) have been implemented. The reason repeated many times for this inaction was the priority of organising EEB’s 40<sup>th</sup> anniversary celebrations. However, some of the commitments required quite trivial effort – such as to share the 2014 report and Panel feedback with EEB’s members – and yet were not met.

It is appreciated that the organisation has followed up on some previous Panel feedback (e.g. anti-corruption policy or anti-discrimination policy) and has published membership with Accountable Now, the previous logo and the EEB’s reports on their [website](#) (at the bottom). This visualisation strengthens the EEB’s commitment to accountability more



prominently in its digital communication. All Members are now asked to upload the **new Accountable Now logo**. Additional information on EN29 is appreciated but not assessed by the Panel.

In terms of **institutional commitment**, it has to be stressed that the report was handed in almost six month late (i.e. 18 months after the end of the financial year 2014). The Independent Review Panel appreciates the reasoning outlined in the attached letter to them and understands the challenges of reporting – in particular for a smaller organisation such as EEB. However, in fast digitalised times, it is rather unprofessional to have a report assessment on a year almost two years after the end of the financial year. On the other hand though, it is appreciated that the EEB is making attempts to spread awareness among its members about the work of Accountable Now and presents a solid commitment on behalf of the Secretary General. It is yet to be seen how this rolls out in practice.

Regarding the letter to the Panel that was shared along with this report, it should be stated that the reporting and vetting process for Accountable Now Members will be revised in 2017 to reflect the [Global Standard for CSO Accountability](#) with a focus on feedback received from partners, staff, beneficiaries etc. The new format is envisaged to be more easily applicable – in particular for smaller CSOs. However, the EEB's next report on 2015 (which was due on 31 December 2016) will still have to follow this current model and the Panel will have to be consistent in their assessment of all Members' reports.

Overall, a lack of **evidence** is still visible throughout the report. Descriptive statements will sound much more powerful if supported by practical examples, which could be related to reporting indicators. Some examples include: (a) reporting the percentage of national entities which comply with certain standards, (b) leveraging existing surveys that provide relevant hard data, (c) thorough globally set parameters, evidenced by random national level controls or d) illustrative case studies.

While it is of course accepted that satisfying responses are copied from previous reports, if the review process is to be at all meaningful we strongly request you to add information where the Panel had already asked for more details in the past (e.g. LA12, SO1). If the EEB considers such Panel requests to be unreasonable or represent unwarranted management effort, this should be raised with the Panel, rather than simply ignored. Main **weaknesses** include: Missing assurance mechanisms that member organisations also comply with the EEB's commitments to accountability (3.8), evaluation of the EEB's Board performance (4.10), feedback and complaints handling (NGO2), as well as calculating their greenhouse gas emissions (EN16). As in the previous year, the Panel has summarised these issues in the enclosed **Improvement Analysis**. This document provides a baseline for you to summarise progress made in these areas. The EEB is encouraged to complete, adjust, and complement it from their perspective.



Finally, it is appreciated that the EEB refers to previous promises from the Gap Analysis throughout the report. While many focus areas could not be delivered as promised due to the work around the 40<sup>th</sup> anniversary celebrations, the Panel will track progress in the next report.

Our intention is that this feedback letter, and any response you may wish to provide, is made publicly available on the Accountable Now website along with your report - as it is the case with all previously reviewed reports. However, should there be errors of fact in the feedback above or in the note below; we would of course wish to correct these before publication. Please share these comments or amendments by 31 January 2017.

If you have any other feedback or comments on our work, please share them with us by sending them to the Accountable Now Secretariat.

Yours sincerely,

Mihir Bhatt

Rhonda Chapman

John Clark

Louise James

Jane Kiragu

Nora Lester Murad

Michael Roeskau

Saroeun Soeung



# Cover Note on the European Environmental Bureau's Accountability Report 2014

Review Round November 2016

## PROFILE DISCLOSURES

### I. Strategy and Analysis

1.1	<p><b>Statement from the most senior decision-maker</b></p> <p><i>Fully addressed</i></p> <p>The report's opening statement by Jeremy Wates, the Secretary General, demonstrates a strong commitment to accountability for the EEB itself and to influencing the environmental policy of the European Union to become also more transparent and accountable.</p> <p>"Transparency is a core value of the EEB." The organisation furthermore demonstrates why accountability is central to their theory of change and defines it as a reporting tool to their members and the general public as well as stimulating membership engagement. In the latter case: How is accountability utilised among management decision-makers? In terms of institutional commitment, it is also commendable that the EEB constantly keeps their own standards of transparency and accountability under review and that they have promoted Accountable Now with their members at their AGM 2014.</p> <p>The EEB has finalised their new long-term strategy beyond 2014 in the reporting year. The Panel looks forward to progress updates in the coming years.</p> <p>Finally, the Panel appreciates the openness that the EEB is still in the process to develop a more rigid and accessible evidence base. This will be a great step towards greater people engagement and impact measurement.</p>
-----	---

### II. Organisational Profile

2.1 - 2.2	<p><b>Name of organisation / Primary activities</b></p> <p><i>Fully addressed</i></p>
2.3	<p><b>Operational structure</b></p> <p><i>Fully addressed</i></p>



	<p>The General Assembly “elects a Board comprising one representative of an EEB member organisation from each Member State where the EEB has one or more full member organisations”. Their <a href="#">website</a> lists 37 Board members as of September 2016; the response to 4.3 mentions 27 members in 2014. The Panel assumes that this variance is due to the merging with the other NGO network of accession countries. Please specifically explain how this large governance structure optimally supports the effectiveness of your organisation. Do the 2 co-presidents and 5 vice-presidents in effect comprise an executive board or “Cabinet” to promote efficiency of this body?</p>
2.4 - 2.7	<p><b>Headquarter location / Number of countries / Nature of ownership / Target audience</b> Fully addressed</p>
2.8	<p><b>Scale of organisation</b> Fully addressed</p> <p>The EEB can be commended for an increase in income by almost 37% from 2013 to 2014.</p>
2.9	<p><b>Significant changes</b> Fully addressed</p> <p>In 2014, the new Global Policies and Sustainability Unit was established, created through the integration of the Alliance of Northern Peoples for Environment and Development (ANPED) into the EEB. This has enabled the EEB to strengthen its capacity and role also outside the EU.</p> <p>Also in 2014, full membership was extended to other countries located in the Europe or being in formal partnerships with the EU (e.g. Ukraine or Moldova).</p>
2.10	<p><b>Awards received</b> Fully addressed</p>
<p><b>III. Report Parameters</b></p>	
3.1 - 3.4	<p><b>Reporting period / Date of most recent report / Reporting Cycle / Contact person</b> Fully addressed</p>
3.5	<p><b>Reporting process</b> Fully addressed</p> <p>The EEB described in its previous report an exemplary robust collective reporting process. Once finalised, the report will be uploaded to their</p>



	<p>website and will be disseminated to EEB members so that a dialogue will remain open with them to encourage engagement with the accountability commitments and to promote enhanced accountability in their own operations.</p> <p>It would be interesting to learn what feedback the EEB received on the 2014 report from its board, members or other stakeholders and how the Panel's feedback letter has shaped developments within the EEB as part of the reporting process.</p>
3.6 - 3.7	<p><b>Report boundary / Specific limitations</b></p> <p><i>Fully addressed</i></p> <p>The report does not attempt to cover the activities of the member organisations except insofar as they are relevant to the functioning of the EEB's activities as a federation.</p>
3.8	<p><b>Basis for reporting</b></p> <p><i>Addressed</i></p> <p>Since formally associated entities have not reported in full, the EEB does not have any systematic assurance that national and regional entities comply with the accountability commitments. However, it is appreciated that the EEB has at least "indirectly" drawn their members' attention to Accountability Now. The Panel welcomes the stated intention that the Accountability Report will be shared with members.</p> <p>The EEB states that it would not be feasible at the moment to carry out any compliance assurance with members since the EEB statutes do not provide the mandate. While this is understood from a legal perspective, the Panel would like to stress again that: For Accountable Now commitments to be fully embedded into the culture, functions and processes of an organisation, it is important to ensure that EEB's members are involved in this commitment. What steps has the EEB taken to encourage its members to uphold the same quality standards - be it those from Accountable Now or from others initiatives? At a minimum, the Panel suggests, EEB members should all have a clear and open process to receive and handle complaints and investigate possible incidents of corruption, as should the EEB itself. What sanctions can the EEB take against members who do not commit to such quality standards? Please provide progress in the next report.</p>
3.10 - 3.12	<p><b>Changes in reporting parameters / Reference table</b></p>



	<i>Fully addressed</i>
<b>IV. Mission, Values, Governance, and Stakeholder Engagement</b>	
4.1	<p><b>Governance structure</b></p> <p><i>Addressed</i></p> <p>This response covers EEB’s governance structure. As mentioned above in 2.3, the report would benefit from displaying evidence on how exactly this large governance structure (comprising one representative per EEB member country; 27 Board members in 2014 and currently 37) is effective in supporting and implementing the organisation’s goals. How do Board members divide power and responsibilities among them? 4.2 mentions a Management Committee (for oversight of financial management) and “time-limited task forces to work on specific issues”. Which task forces existed in 2014 and how has this supported the overall governance structure of the EEB?</p> <p>Moreover, the EEB is again asked to provide information if an effective risk management is in place that ensures identification of risks and compliance in the different jurisdictions.</p>
4.2 – 4.3	<p><b>Division of power between the governance body and management / Independence of Board Directors</b></p> <p><i>Fully addressed</i></p>
4.4	<p><b>Feedback from internal stakeholders</b></p> <p><i>Fully addressed</i></p> <p>The report mentions the annual staff retreat providing an opportunity for EEB staff to come up with recommendations to the Board via the Secretary General or to set up staff-led working groups on concern areas.</p>
4.5	<p><b>Compensation for members of highest governance body</b></p> <p><i>Partially addressed</i></p> <p>The Panel is still looking forward to the review of the EEB’s salary scale – including senior staff pay scales which is not published at the moment but aims to strike a balance between public expectations of not-for-profit organisations and the necessity to attract good personnel and senior staff.</p>
4.6	<p><b>Conflicts of interests</b></p> <p><i>Fully addressed</i></p> <p>The EEB has taken on board previous Panel feedback and provides much more information concerning conflicts of interests. It is appreciated that</p>



	the Board has furthermore adopted an anti-corruption policy in 2014 (more further down under SO3) which was also submitted to the Panel.
4.10	<p><b>Process to support highest governance body's own performance</b>  <i>Partially addressed</i></p> <p>As already highlighted in the last feedback letter, it is recommendable that the EEB initiated a proposal to evaluate the functioning of the Board. The Panel recommends including clear progress and performance results in order to effectively support and empower the individual's work and commitment. The footnote on page 15 states that first amendments have taken place in 2015 and the Panel expects speedy progress.</p> <p>Moreover, information on term limits is again omitted in this report.</p>
4.12	<p><b>Social charters, principles or other initiatives to which the organisation subscribes</b>  <i>Fully addressed</i></p> <p>The EEB does not adhere to any other initiatives.</p>
4.14 - 4.15	<p><b>List of stakeholders / Basis for identification of stakeholders</b>  <i>Fully addressed</i></p> <p>Does the EEB also interact with the business sector and industry?</p>

## PERFORMANCE INDICATORS

### I. Programme Effectiveness

NGO1	<p><b>Involvement of affected stakeholder groups</b>  <i>Addressed</i></p> <p>The answer demonstrates a good feedback culture – both with internal and external stakeholders – although not formalised. It is again commendable that the EEB organised 26 meetings for Working Groups in 2014. In this regard, is there any particular evidence demonstrating sense of stakeholder ownership the EEB could share? And what examples could be listed for the “clear evidence that stakeholder engagement processes have positively affected EEB decision-making”?</p> <p>The Panel is disappointed with a lack of action on previously identified commitments but appreciates the honest reflection upon undelivered promises</p>
------	--



	<p>such as the outstanding upgrade on the Extranet facility, unfinished visual representation of EEB membership or that the accountability report was not shared with members. Developments thereof will be assessed by the Panel in the EEB's next report.</p>
NGO2	<p><b><i>Mechanisms for feedback and complaints</i></b>  <i>Partially addressed</i></p> <p>The EEB has not yet established or published a formal feedback and complaints handling mechanisms but is aware of the shortcoming – in particular since this is also a minimum requirement of Accountable Now membership. The EEB had prioritised the formal set-up in previous reports and is urged to come to results. Thus, the Panel expects this to be in place by the next report as well as a report on steps taken to require all EEB members to have a complaints process in place. The EEB is advised to contact other Accountable Now Members (e.g. Oxfam GB or Sightsavers) that can assist in developing such mechanisms. SOS Children's Villages has also just recently set up a solid framework in this regard.</p> <p>In the meantime, the newly adopted anti-corruption policy (shared with the Panel) also includes a section on complaints. This covers the scope for internal and external complaints, timelines, and responsibilities. The Panel strongly encourages the EEB to track complaints received and evaluate them in a way to institutionalise lessons learnt from these.</p>
NGO3	<p><b><i>Programme monitoring, evaluation and learning</i></b>  <i>Partially addressed</i></p> <p>The answer given is again rather general. It is indicated that MEL occurs at staff level (meetings between each policy officer and their supervisor), at membership level (various working group meetings), and in annual activities' reports. However, there is no concrete system in place to entirely focus on monitoring and evaluating programmes, to respectively and specifically address burning issues in order to drive positive change.</p> <p>The EEB had promised to include overarching KPIs in their strategic plan 2015-2020 as well as to annually assess and evaluate these KPIs going forward. Due to other priorities, this endeavour could not be achieved, but the Panel will thoroughly track necessary progress in the next report.</p>
NGO4	<p><b><i>Gender and diversity</i></b>  <i>Addressed</i></p>



	<p>As in their last reports, the EEB states that it takes gender and diversity into account when hiring or when organising conferences. A policy on non-discrimination was adopted in 2014 and shared with the Panel. What are the concrete tools used for analysis, or the actions taken to achieve gender and diversity goals? The EEB came close to its target of gender parity among conference speakers; however, improvements can still be made (e.g. 40th anniversary conference). What other actions are planned to achieve “enhanced coordination with EU-level gender, youth, development and diversity groups”?</p> <p>The organisation still considers that gender and diversity do not play a big role in programme and policy design and implementation; however, the issue was part of collaborations (e.g. Spring Alliance or Rio+20 outcome).</p>
NGO5	<p><b><i>Advocacy positions and public awareness campaigns</i></b></p> <p><i>Addressed</i></p> <p>While some progress can be seen (e.g. capacity building for NGOs tackling waste issues in Poland), the general approach is similar to previous reports: The EEB provides information as to how it formulates positions and how it communicates them. However, it does not provide information on how the organisation ensures that its public criticisms are fair/accurate, how corrective actions are taken, or how it exits public awareness campaigns.</p> <p>The EEB is commended on its comprehensive working groups and its extensive and very useful online library. However, while it is good to publish information online, engaging stakeholders in the formulation of policy positions should be a two-way process. When developing the new strategic approach for external and internal communications, the Panel recommends including forms of meaningful dialogue with stakeholders.</p>
NGO6	<p><b><i>Coordination with other actors</i></b></p> <p><i>Addressed</i></p> <p>Equally to its last reports, the organisation further recognises the need for coordination and gives concrete examples and illustrative evidence of how it collaborates with others. What does it mean when the EEB says that they ensure that “as far as possible” its positions are consistent with those of actors holding “broadly similar” values?</p> <p>As also previously noted, the EEB is strongly encouraged to provide information on internal policies or processes to prevent duplication, to promote learning from the work of other actors, or to coordinate with others.</p>



II. Financial Management	
NGO7	<p><b>Resource allocation</b></p> <p><i>Partially addressed</i></p> <p>The EEB notes that the initial allocation of resources is made via the Annual General Meeting and provides further information on the processes in place to track allocation and use of funds. However, the EEB is asked to provide a link to their latest independently audited accounts in its accountability reports. Is there a reason why the EEB has moved away from private sector funding?</p>
NGO8	<p><b>Sources of Funding</b></p> <p><i>Fully addressed</i></p> <p>While the EEB is commended on having attracted significant foundation funding, the Panel questions why it should no longer be advisable to also explore private sector funding?</p>
III. Environmental Management	
EN16	<p><b>Greenhouse gas emissions of operations</b></p> <p><i>Partially addressed</i></p> <p>The EEB has undertaken first steps towards developing a detailed and comprehensive policy to limit the organisation’s environmental impact. This includes the staff working group Greening the EEB with the aim to strengthen and make more explicit internal policies and measures for assessing and limiting the EEB’s ecological footprint. The Panel finds it surprising that an environmental CSO network still does not have such policies in place and looks forward to adoption of the final policy.</p> <p>As in previous years, the organisation states that direct and indirect emissions are not yet calculated. However, staff is now required to report on their greenhouse gas emissions when travelling which is part of the groundwork for future years. Due to the nature of the EEB’s work and mission, the Panel urges the EEB to provide figures in the next report.</p>
EN18	<p><b>Initiatives to reduce emissions of operations</b></p> <p><i>Addressed</i></p> <p>The EEB shares some common practices of how its offices attempt to reduce greenhouse gas emissions and has followed up on its own targets (setting up a staff working group, measures to calculate emissions, eco-procurement for events, more web-conferencing). However, concrete figures and data are necessary to underline these achievements. Greenpeace implemented a new greenhouse gas emissions management tool (“CloudApps Sustainability”) in 2014 which enables their national and regional offices to receive detailed</p>



	<p>reports on their current and historic emissions and to receive a benchmark of their Environmental Performance against other offices. CBM has also developed an easy-to-calculate CO2 footprint. The Accountable Secretariat will be happy to connect the EEB with other Members for support. Finally, what is the baseline for reduction targets and in how far have other initiatives led to reduction targets?</p> <p>While EN29 is not part of the official Panel assessment, the EEB is commended for having a shared bike policy in place to reduce CO2 emissions.</p>
EN26	<p><b><i>Initiatives to mitigate environmental impact of activities and services</i></b>  <i>Addressed</i></p> <p>The EEB confirms that it generally does not measure the main environmental impacts of the organisation's programmes, projects, or activities, nor does it conduct an environmental assessment prior to carrying out activities.</p> <p>The EEB's office procurement guidelines will only be finalised in 2015, which will also include asking all suppliers for their sustainability policy in the early stages of tendering. The staff working group also aims to finalise the Greening EEB Meetings guidelines in 2015. Similarly to EN16, with the EEB being an environmental organisation, it is recommendable to initiate a more targeted approach to minimising environmental impacts in certain activities and services.</p>
<b>IV. Human Resource Management</b>	
LA1	<p><b><i>Size and composition of workforce</i></b>  <i>Fully addressed</i></p>
EC7	<p><b><i>Procedure for local hiring</i></b>  <i>Fully addressed</i></p>
LA10	<p><b><i>Workforce training</i></b>  <i>Fully addressed</i></p> <p>It is very commendable that the EEB has undertaken a staff survey in 2014 to identify training needs and shares results in this report. As a consequence, a training session on presentation skills was delivered to 18 out of 29 staff. How does the EEB track if these trainings are successful?</p> <p>The Panel will track future improvements in regard to training hours per staff in coming years (i.e. up to four training days per year by 2016).</p>
LA12	<p><b><i>Global talent management</i></b>  <i>Addressed</i></p>



	<p>The response is the same as in the previous report although the Panel had already asked for further information whether really 100% of staff have received performance reviews with their supervisors in the reporting period. Is there evidence that these development reviews work well in practice?</p>
LA13	<p><b><i>Diversity of workforce and governance bodies</i></b>  <i>Fully addressed</i></p> <p>The EEB adopted a non-discrimination policy in 2014, which was shared with the Panel. While the Board tends to be rather male, the majority among staff are female. Has the EEB set any internal improvement targets in regard to its overall diversity? Is the annual assessment of diversity planned for 2015 instead?</p>
NGO9	<p><b><i>Mechanisms to raise grievances</i></b>  <i>Addressed</i></p> <p>The EEB's newly adopted anti-corruption policy also includes a complaints mechanism. When will Board members and the Secretary General elaborate on the three identified points in the policy? Generally, more details will be appreciated in the next report. For example: Which "relevant standards" are adhered to? How does EEB ensure that grievances raised with the respective supervisor are resolved satisfactorily?</p>
<p><b>V. Responsible Management of Impacts on Society</b></p>	
SO1	<p><b><i>Managing your impact on local communities</i></b>  <i>Addressed</i></p> <p>The answer is the same as for 2013. Some additional information and examples on how exactly the EEB is responsible for and assesses a positive contribution to society, in terms of impact activities, as well as the types of positive feedback from partners received will be appreciated in the next report.</p>
SO3	<p><b><i>Anti-corruption practices</i></b>  <i>Addressed</i></p> <p>The EEB adheres to a strict zero-tolerance policy on corruption. The organisation commendably took note from previous reports and its Board adopted an anti-corruption policy in 2014, which was shared with the Panel. Is there already evidence that this policy is well known and used by staff?</p>
SO4	<p><b><i>Actions taken in response of corruption incidents</i></b>  <i>Fully addressed</i></p> <p>The EEB states that no incidents of corruption or fraud happened in 2014. The new policy lays out theoretical actions in response to any incidents – e.g.</p>



	suspension or removal of the employee or forwarding any allegations to the authorities for further investigation.
<b>VI. Ethical Fundraising</b>	
PR6	<p><b><i>Ethical fundraising and marketing communications</i></b></p> <p><i>Fully addressed</i></p> <p>Similarly to the last report, it is stated that the EEB is “regularly critical” of European Commission decisions. While dependency on the EC core grant is continuously decreasing since 2011, the response could still benefit from evidenced statements in support of this regular criticism.</p> <p>It was decided to no longer pursue the revision of ethical fundraising guidelines with regard to private sector funding since efforts are rather increased to attract foundation funding.</p>