# Accountable Now

GLOBAL STANDARDS LOCAL TRUST



## Educo Independent Review Panel Feedback

Accountability Report 2016
Review Round October 2017



### Educo Feedback from the Independent Review Panel

**Review Round October 2017** 

16 November 2017

Dear José M. Faura,

Thank you for submitting your Accountability Report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to continuously strengthen 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 <u>recent study</u> 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.

<u>Feedback Labs</u>, with whom Accountable Now collaborated on the <u>People-Powered Accountability project</u>, also serve as a valuable source of information on how to close feedback loops.

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

As part of the <u>12 Accountability Commitments</u>, 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 Educo:

Educo's sixth report is on the whole comprehensive, engaging, and indicative of a collaborative reporting process, with strong narrative-based **evidence** and illustrative case studies from various Country Offices provided throughout. The report refers to a wide array of policies, all of which appear to be highly appropriate. The report, however, gives much less attention to how those policies are working in practice and management's efforts to monitor and ensure their compliance. For example it is stated that: "all our programs and projects should include a strategy for child participation"; but what is the practice? Similarly, that "...all Educo's local partners are expected to comply with the minimum requirements established in our Partnership Policy and Guide"; but is there monitoring to establish whether this is followed?

Executive Director José M. Faura's opening statement demonstrates strong institutional commitment to accountability, from selecting accountability as one of five domains of change that Educo will focus on in the coming years, to identifying the reporting process itself as an opportunity to reflect on and adapt the organisation's work and accountability.

Educo's efforts to make their accountability report widely accessible by creating an infographic-based Executive Summary, publishing this earlier in the year, making both the summary and full report available in three languages, and disseminating the reports through a number of channels, is identified as a **good practice** (3.5). So



is the creation of child-friendly versions of various institutional documents, as mentioned in the Executive Director's statement in 1.1.

The Panel furthermore appreciates that Accountable Now membership, the logo and accountability reports are also published on Educo's website - however, the link to the report leads to the Spanish language report from 2013.

In fact, a number of links to documents provided led to Spanish language versions. If certain documents are not available in English, it would be helpful to clarify this. Furthermore, providing links to policies and other key documents referred to – although they may have been linked in previous years' reports or earlier in the same report – would increase the reader-friendliness of the report.

The Panel is pleased to see that the majority of its feedback has been taken on board and responded to. A remaining area of **weakness** is relatively low performance appraisal rates (though these have increased since the last report) and a lack of evidence that the mechanisms for human resources management and staff development work well in practice (LA12).

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 any comments or amendments by 30 November 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,

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## Cover Note on Educo's Accountability Report 2016

**Review Round October 2017** 

#### PROFILE DISCLOSURES

#### I. Strategy and Analysis

1.1 Statement from the most senior decision-maker

Fully addressed

Educo's Executive Director José M. Faura again provides an inspiring opening statement that demonstrates the importance Educo places on accountability. It is pleasing to see that quality, accountability and learning are among the five domains of change that Educo will be prioritising over the coming years. The Panel looks forward to more details on how this is done in future reports. The Executive Director mentions that the process of gathering data and information for Educo's accountability report leads to reflection and adaptation within the organisation about their work and accountability – it is satisfying to see that the reporting process is valued in this manner.

The incorporation of stakeholder feedback through Child Rights Situation Analyses (CRSAs) and other feedback mechanisms in Educo's planning and strategic decision making is commendable. Educo ensures accessibility to their target group by creating child-friendly versions of various institutional documents, which the Panel identifies as a **good practice**.

By joining Keeping Children Safe and the UN Global Compact, and integrating the issues these platforms advocate for into their organisational strategy, Educo plans to further strengthen the efficacy of their accountability mechanisms.

As in previous years, Educo has provided a clear and engaging Executive Summary of their accountability report, which supports the Executive Director's statement that Educo is dedicated to promoting and circulating their report amongst different stakeholders.



II. Organis	sational Profile
2.1 – 2.7	Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience
	Fully addressed
2.8	Scale of organisation
	Fully addressed
	A detailed breakdown of the scale of the organisation is provided, including staff numbers, target population reached, supporters, and finances. The geographical spread of Educo's work would also be of interest.
	A direct link to Educo's financial statements would have been useful – the link provided leads to Educo's homepage – as for the last full report.
	The Panel considers that staff levels appear high relative to overall income (about 31,000 EUR per employee). Does the budget for this reduce capacity for Educo's programmes and reach?
2.9	Significant changes
	Fully addressed
	Educo has consolidated its membership of the ChildFund Alliance over the past two years. ChildFund Alliance also joined Accountable Now in 2017, aiming to streamline its accreditation process and align its members' standards with those of Accountable Now. The Panel hopes this allows Educo to report to both organisations with a single report.
2.10	Awards received Fully addressed
	Educo is congratulated on its receipt of Quality Mark 1 certification by People in Aid in 2015, and various other recognitions of their work in several countries in 2015-16.
III. Report	Parameters
3.1 – 3.4	Reporting period / Date of most recent report / Reporting cycle / Contact person  Fully addressed



3.5	Reporting process
	Addressed
	Educo's reporting process remains meaningful and timely, with a detailed outline provided. It is stated that a survey of all offices is conducted to ensure the report covers the global organization; please report what percentage of the Country Offices supplied the requested information. The publishing of the reports in Spanish, English and French, along with its wide dissemination including links in corporate signatures and a dedicated blog post, remains a <b>good practice</b> . The Panel also commends the incorporation of relevant feedback on the report into Educo's annual planning.
3.6	Report boundary
	Fully addressed
3.7	Material content limitations
	Fully addressed
	The Panel is pleased to note that the data used to calculate Educo's carbon footprint now includes all Country Offices in addition to the Head Office and Delegations in Spain.
3.8	Basis for reporting
	Fully addressed
	As in previous years, the Panel appreciates Educo's coordination of data and information collection from programme countries, across key departments. The adaptation of the timeline to allow the Executive Summary to be published earlier in the year, and therefore disseminated more broadly, is noted positively.
3.10 – 3.12	Changes in reporting parameters / Reference table
	Fully addressed
	N/A
IV. Missior Engagem	n, Values, Governance, and Stakeholder nent
4.1	Governance structure
	Fully addressed
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	Detailed information about Educo's governance structure, responsibilities of the Board, decision making processes, and its thorough risk management (external and internal) is provided.
4.2	Division of power between the governance body and management  Fully Addressed
4.3	Independence of Board Directors
	Fully addressed
	The composition of the Board of Trustees is outlined, and it is clarified that José Faura is the only trustee to hold a position in the organisation.
4.4	Feedback from internal stakeholders
	Addressed
	Educo's internal stakeholders have a number of avenues for providing feedback: the Board and Executive Director meet twice a year, the Auditing and Compliance Unit presents recommendations to the Board, and the global Complaints and Feedback Policy outlines mechanisms for further feedback – a link to the policy would be useful to see the details of these mechanisms.
	Educo's 2014 consultation with internal stakeholders on issues of governance, accountability and human rights culture is again mentioned. The Panel repeats its question from the last report about whether this consultation will occur periodically.
	The inclusion of teams from all Educo's programme countries in developing the organisation's Theory of Change in 2015 is noted positively.
4.5	Compensation for members of highest governance body
	Fully addressed
	Educo's salary scales are set in line with professional categories that guarantee both internal and external equity. Educo is reviewing whether it will public salary information in light of the organisation's new Open Information Policy. The Panel looks forward to further developments in the next report and notes that



	many AN members provide information about the remuneration of their top managers.
4.6	Conflicts of interests Fully addressed
	Educo's By-Laws, Code of Good Governance and Ethical Code protect against conflicts of interest – links to these policies, as were provided in previous reports, would be welcome for easier reference. The latter two codes are global in scope, and therefore do not need to be adapted to local contexts.
	The Panel welcomes the update to Educo's Ethical Code, stipulating that the entire team should be committed to complying with the Code, and the possibility of disciplinary and/or penal measures for non-compliance.
4.10	Process to support highest governance body's own performance
	Results of the last self-evaluation by Educo's Board in 2015 would have been welcome, including any changes that were implemented as a result. The next evaluation is planned for 2018, and the Panel would like to see its results as well as the planned baseline for defining areas of improvement and setting objectives. The panel notes that the report still uses confusing language, referring to two self-evaluations within the "mandate" of the board, when in practice the rotation of board members means that there is no such period implied by this term.
4.12	Social charters, principles or other initiatives to which the organisation subscribes  Fully addressed
4.14-15	List of stakeholders / Basis for identification of stakeholders
	Fully addressed
	As in previous years, a detailed overview of Educo's stakeholders and their identification, selection, and categorisation is provided.



### PERFORMANCE INDICATORS

#### I. Programme Effectiveness

#### NGO1 Involvement of affected stakeholder groups

Fully Addressed

Educo's Child Participation Standards stipulate that all programmes and projects include a child participation strategy and a monitoring mechanism. The Child Rights Situation Analyses calls for a highly participatory approach to the identification of new programme proposals and Country Offices' action plans. Educo includes diverse groups of children in the planning of its projects, including the most vulnerable, with the consultation format taking the form of workshops and focus group discussions. Useful case studies of how these processes have shaped projects in Bangladesh, Nicaragua and the Philippines are provided. The Panel would like to know if all CRSAs are published and noted that while some can be accessed via the relevant country page of Educo's website, others (such as Philippines) cannot.

#### NGO2 | Mechanisms for feedback and complaints

Fully Addressed

Educo's Complaints and Feedback Policy is being rolled out across Educo's Country Offices, with a Global Implementation and Monitoring Committee coordinating the policy's implementation – first for internal and in a second phase for external stakeholders. The Panel asks how many Country Offices have implemented the policy so far, and looks forward to reading about further progress in the next report.

Educo received 112 complaints in 2016 versus 20 in 2015, with the increase being mainly attributable to the installation of new suggestion boxes and mailboxes in schools and Children's Homes. The Panel wonders whether there is a common theme to the complaints and would welcome a breakdown of their nature and country of origin.

Interesting case studies are provided, and the Panel congratulates Educo on its participation in creating ChildFund Alliance's Child-Friendly Accountability Initiative. The Panel would appreciate a link to this document, and looks forward to more information in the next report about how the initiative is being implemented by Educo in El Salvador.



NGO3	Programme monitoring, evaluation and learning
11000	Addressed
	Project monitoring, evaluation and learning is based on a participatory approach, and guided by Educo's International Development Projects Manual. It does not appear, however, that this manual has been published (unless it is not available in English). If the manual is published, it would be good to provide a link to this document; if not yet published, the panel suggests it would be a good practice to make it available to external stakeholders.
	While the policy regarding evaluations and their use to inform improvements in project planning and implementation is welcome, the panel would be interested to know whether evaluations are routinely or selectively made available to interested stakeholders. For example, the report refers to the external evaluation of the Burkina Faso programme, but this did not appear to be on the website.
	In 2017-18, Educo's Monitoring, Evaluation and Learning Unit aims to homogenise the MEL tools used in different countries and consolidate a culture of evaluation. The Panel looks forward to more information about how this is working in the next report.
NGO4	Gender and diversity
	Addressed
	Addressed  Educo has been working on a Non-Discrimination, Diversity and Inclusion Policy since 2013. It is now expected to be designed in the latter half of 2018, and the Panel would like to know why the process has been delayed and when the policy will begin to be implemented.
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conceptualisation of projects, a shared commitment to contributing resources, and mutual accountability.

Educo's partner organisations are expected to meet the highest accountability standards, and the minimum requirements are outlined, but the Panel wonders how this is assessed or ensured. Are there signed agreements, or other mechanisms in place? For example, does Educo take steps to monitor whether partners act by the minimum requirement for "transparent management" or encourage compliance? What happens if/when they don't?

#### II. Financial Management

#### NGO7 Resource allocation

Fully Addressed

Educo's allocation and tracking of resources is outlined in detail, with resource allocation linked to a number of strategic and financial plans, and monitored through various tools and reports. The Management Control Unit verifies the proper use of resources (beyond the economic) and compliance with policies.

#### NGO8 | Sources of Funding

Fully addressed

#### III. Environmental Management

#### EN16 Greenhouse gas emissions of operations

Fully addressed

The Panel congratulates Educo on including emissions data from the entire organisation and covering all "scopes"/types of emissions for the first time in 2016. 62% of emissions are related to transport, travel and paper, compared to 44% in 2014 – is this due to the inclusion of offices beyond Spain in this calculation in 2016, or increased travel, or a combination of the two? Will there be actions taken to reduce organisational travel?

Similarly, the Panel would like to know whether the 2014 figures will no longer be used as a baseline, as they did not cover all scopes for all countries. Will 2016 be used as the new baseline?

The Panel welcomes Educo's initative to analyse various software tools for calculating carbon footprint.



## EN18 & Initiatives to reduce emissions of operations / Initiatives to mitigate environmental impact of activities and services

Addressed

Educo introduced its <u>Environmental Policy</u> in 2015, and an Implementation and Monitoring Committee has been established to disseminate the policy, monitor its implementation, and circulate good practices and lessons learned. Educo is still in the initial phase of implementing the policy, but a number of examples from 2015 and 2016 of actions to reduce environmental impact have been provided. The Panel commends these actions and looks forward to reading the results of the policy's actual implementation in future reports.

One question from the previous feedback letter remains – are there plans to set any concrete reduction targets?

#### IV. Human Resource Management

#### LA1 Size and composition of workforce

Fully Addressed

#### EC7 **Procedure for local hiring**

Fully addressed

Educo is committed to hiring local staff as far as possible, with next preference given to those from neighbouring countries.

A new International Mobility Guide is referred to, which has replaced the Expatriate Policy. A link to this guide would be welcomed.

Local hiring conditions are determined with reference to compensation studies, enabling Educo to align with local contexts.

#### LA10 Workforce training

Fully addressed

A comprehensive description of workforce training is provided, including Educo's definition of training, how training needs are identified, and how effectiveness of training is ensured. The average training hours per employee is displayed, separated by professional category and Country Office. There appears to be a surprising variation in the provision of training to both managerial (from zero to 208 hours per manager) and non-management staff (from zero to 116 hours per staff member); the Panel asks for an explanation of the causes of this variation?



#### LA12 Global talent management

Addressed

The Panel notes that the percentage of Educo staff undergoing formal review processes increased in 2016, to 50%. Are there plans to further improve in this area and how?

A new human resources management system was introduced in Educo's Asian Country Offices, and the system is planned to be implemented in all offices by 2018. The Panel would still be interested in initial outcomes and results from the pilot initiative.

The question from last year's feedback letter also remains: does Educo include a human-rights based approach in its reviews? Are questions about participation, empowerment and inclusion integrated into Educo's performance appraisals?

The Panel commends the integration of the Development Room online learning platform into Educo's professional development initiatives, and would be interested in knowing how broadly it has been used and whether positive outcomes have been seen.

#### LA13 Diversity of workforce and governance bodies

Fully addressed

In 2016, Educo introduced a monitoring tool to gather information about their human resources in all Country Offices. As of 2017, the tool includes indicators on all equity and diversity criteria, including professional category, level of responsibility, nationality, age, gender, disability, and type of contract and working day. The Panel welcomes this development.

Educo's Executive Committee now has more women than men (5-3), although the Board of Trustees is still rather imbalanced in terms of gender (2 women to 7 men).

#### NGO9 | Mechanisms to raise grievances

Fully addressed

Educo has introduced an International Human Resources Manual, defining the minimum standards for work conditions, rights and responsibilities. The Panel would like to see a link to this manual.

Educo's global Complaints and Feedback Policy (again, a link is requested) establishes mechanisms by which all stakeholders can raise complaints, opinions and feedback. The panel notes that the complaints policy specifies an appeals process (that also applies to



requests under its Open Information Policy) and would like to know if this has been invoked as yet, and if so to what effect.

In 2016, a number of participatory processes were carried out to generate communication between the organisation's teams and governing bodies, such as an international survey on Educo's organisational culture.

Educo has also created a Safety and Security Policy which will feed into a foundation-wide Security Guide and country level Country Protection Plans.

#### V. Responsible Management of Impacts on Society

#### SO1 Managing your impact on local communities

Addressed

A comprehensive description of Educo's policies and tools regarding impact on the wider community has been provided. The <u>Partnership Policy and Guide</u> stipulates that work with local partners should be collaborative and participative, with a focus on mutual accountability, proximity, sustainability and capacity building. The example of Educo's school sanitation project in Guatemala highlights how exit strategies including training can strengthen the capacities of participants so that results and impact remain sustainable.

Educo's Child Rights Situation Analyses are a positive example of how local stakeholders are consulted to ensure the local context is properly understood and to incorporate suggestions for project improvement into annual planning. Educo states that the feedback received is overall highly positive, and relates to processes, local coordination, and continuity and replication of projects.

The results of the Social Returns on Investment (SROI) study of Educo's Social Action Program have been outlined, though a link to the complete report mentioned would be welcome. The 2014-2015 study's results indicated a social impact valued at almost 6x the original investment, with positive impacts at the personal, school and social levels.

The Panel is interested in following these evaluations, and learning more about how recommendations will be implemented.

#### SO3 Anti-corruption practices

Addressed

The Panel welcomes the development of an <u>Anti-Fraud and</u> <u>Corruption Policy</u> as well as a <u>Whistleblowing Policy</u> in 2016. These



policies establish a zero-tolerance principle for fraud and corruption, and protect whistleblowers from reprisals. The Panel would like to know the timeline for the publication and implementation of these policies, as well as what plans there are to ensure proper implementation of the policies and train staff accordingly. The Panel looks forward to following any outcomes and results following the implementation of the policies.

Educo also has an <u>Ethical Code</u> which applies to the whole organisation as well as to dealings with external partners/stakeholders, as well as a new <u>Investment Policy</u> (this was linked in Spanish) committing to ethical conduct, transparency and accountability.

#### SO4 Actions taken in response of corruption incidents

Fully addressed

There were no cases of corruption detected in 2015 and 2016. Any cases that may occur would be handled under the procedures outlined in Educo's Anti-Fraud and Corruption Policy.

#### VI. Ethical Fundraisina

#### PR6 Ethical fundraising and marketing communications

Fully addressed

Educo's funraising activities are regulated by the principles set out in their Ethical Code, Child Safeguarding Policy an ode of Conduct and Policy for Collaborating with Businesses (Spanish). The design of a Donations Policy was postponed to 2018 due to focus on developing other internal policies in the reporting period.

Educo also complies with Spanish law on the Prevention of Money Laundering and Financing of Terrorism. Information about donations by private sector companies over 1000 EUR is published broadly, and the cost value of in-kind donations are determined when possible.

Educo received 15 complaints in 2016 and 10 in 2015 relating to fundraising campaigns, all of which were dealt with in line with their updated Procedure for Handling Complaints and Feedback.