

20 December 2013

Independent Review Panel – Virtual Meeting 28-29 November Letter to the Members in this Review Round

Dear Agnès Callamard,

Thank you for submitting your accountability report to the Charter's Independent Review Panel for assessment. As in previous years we found that the quality of reports is generally improving, demonstrating greater institutional commitment and more evidence that mechanisms are working in practice. Before providing individual feedback on your organisation's report, allow us however to highlight three areas of general concern:

1.) *Embedding the Charter as a tool for organisational development (3.5)*

The disclosure profile 3.5 looks like a rather technical question on how the report is compiled and organisations tend to report accordingly. But it really asks for a process that is at the heart of what the Charter wishes to achieve: using the report as an opportunity for a cross functional systematic and critical reflection on how accountability is best implemented underpins the legitimacy and quality of your organisation's work. Accountability is all too often perceived as a defensive tool, when it is really a mechanism to pro-actively support organisational development. Please describe under 3.5 how you use the reporting process to embed accountability into your organisation. Against this background Members are also strongly encouraged to place the Charter logo prominently on their website and to further link to the Charter website, so that stakeholders know what to hold you accountable against.

2.) *Complaints Handling Mechanisms (NGO2)*

Having a fully functioning complaints handling mechanism in place is the only Minimum Standard for Charter Members so far. The Panel is very concerned about rather slow progress by many Charter Members to comply with this. We have therefore decided to ask the Charter Board to look into implementing a timeline and sanctions policy for compliance. In our view the leeway should be no longer than two to maximum three years after a Minimum Standard has been adopted. You find examples of well-functioning complaints handling mechanisms in the Good Practice document on the Charter website, capturing good examples from this and previous reporting rounds.

3.) *Succinctness and communication quality*

There is a danger that accountability standards develop a life of their own and become increasingly complex and detached. We have noted that Charter reports tend to get longer without necessarily providing more relevant information. It is important however to use these reports to actively communicate internally and externally how accountability is part of the DNA of your organisation and strengthens the quality of your work. In order for these reports to be read, we suggest that they should have a maximum of 40 pages. For each GRI indicator it is sufficient to report three things:

- a) Do you have policies and processes in place to address the issue?
- b) Do you have evidence that it is embedded in systematic practice?
- c) Is there evidence to show that this has led to improved quality of work?

Sometimes the Panel asks for more information. We are trying to do so only where it is necessary, and we encourage you to be as succinct as possible, and take the above three parameters as guidance. Also try to avoid repetition and where illustrations are given, please keep these brief. Organisations who wish to merge their accountability report with the annual report are encouraged to additionally provide a separate and more reflective addendum relating to the Charter if the annual reports do not embrace that due to a desire to be more promotional.

Organisation-specific feedback to ARTICLE 19:

*This is the first report of ARTICLE 19 which joined the Charter in July 2011 – already as a Full Member at the time. The report is good, especially for being the organisation’s first report. However, it has not been used to its fullest as an opportunity to critically examine the organisation’s quality assurance mechanisms and how to improve them. The opening statement is not signed by the CEO, which can be seen as a lack of institutional commitment. Two indicators – advocacy positions and public awareness campaigns (NGO5) and the organisation’s impact of operations on communities (SO1) – had been missing in the beginning, but were handed in upon request by the Charter Secretariat. The organisation is commended for a **good practice** approach to its local hiring procedures (EC7) and its thorough monitoring and evaluation framework at the strategic and operational (NGO3 - for small organisations). The whole report would have benefited however from being more succinct and less repetitive. Two important things are missing: All Charter Member organisations are asked to publish the Charter logo and a link to its website on their own websites and all Members are obliged to have a fully functioning Complaints Handling Mechanism in place. Please ensure to have both for the next report, since in particular the latter is a minimum requirement for Charter Membership.*

Our intention is that this letter, and any response you may wish to provide, is made publicly available on the Charter website, along with your report. You can find the reports that were previously reviewed on the Charter website. 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 corrections by 20 January 2014.

If you have any other feedback or comments on our work, please share with us by sending them to the Charter Secretariat. We would very much like to hear your views.

Yours sincerely,



Janet Hunt · Wambui Kimathi · Tony Tujan · Richard Manning · Louise James · Brendan Gormley

**Review Round October 2013
Cover Note on Accountability Report
ARTICLE 19**

Reporting period: Calendar year 2012

PROFILE DISCLOSURES	
Profile	Comments
Strategy and Analysis	
1.1	<i>Partially addressed</i> The organisation's statement provides good and interesting information on ARTICLE 19's strategic priorities, goals and objectives. However, this indicator requests a strong and convincing senior management commitment to <i>accountability</i> as a guiding principle for quality assurance. That is missing and so is the signature by the CEO.
Organisational Profile	
2.1	<i>Fully addressed</i>
2.2	<i>Fully addressed</i> Relevant information about ARTICLE 19's primary activities is given. Further information on how these activities are optimally linked to achieving its mission is welcome in the next report.
2.3 – 2.6	<i>Fully addressed</i>
2.7	<i>Fully addressed</i> Relevant information about the target audience and affected stakeholders is given. More information on the selection criteria and the process works well in practice would be welcome in the next report.
2.8	<i>Fully addressed</i> It is positively noted that detailed information on the number of unpaid volunteers within the organisation is provided in indicator LA1.
2.9 – 2.10	<i>Fully addressed</i>
Report Parameters	
3.1 – 3.4	<i>Fully addressed</i>
3.5	<i>Fully addressed</i> Concerning the process for defining report content, more detailed information on how the report's content is compiled and who contributes in which way is to be found under the additional indicator 3.9. Further information on how ARTICLE 19 used the compilation of the report to involve all functions of the organisation in a systematic review of the organisations' accountability commitments and how they help drive the quality of its work would be welcome in the next report.
3.6 – 3.7	<i>Fully addressed</i>
3.8	<i>Partially addressed</i> Information about the basis for reporting on joint ventures etc. is given. Further information on which processes and systems are in place to ensure that regional and country offices fully comply with ARTICLE 19's commitments to the Charter.
3.9 – 3.12	<i>Fully addressed</i>
Governance, Commitments, and Engagement	
4.1	<i>Fully addressed</i> Some relevant information about the governance structure of the organisation is to be found under indicator 2.3. Article 19 is encouraged to state which

	authority rests explicitly with the local, national and global level.
4.2	<i>Fully addressed</i> Information about whether the Chair of the highest governance body is also an executive officer is given. More information on how the organisation ensures the effectiveness of its Board would be welcome in the next report.
4.3	<i>Fully addressed</i>
4.4	<i>Fully addressed</i> Information about mechanisms for internal stakeholders etc. to provide recommendations is given. It would be interesting to know for the next report how ARTICLE 19 ensures that the exchange of information is meaningful and leads to management positive response.
4.14	<i>Fully addressed</i>
4.15	<i>Partially addressed</i> No clear answer is given on <i>which basis</i> and <i>why</i> certain stakeholders are selected.

PERFORMANCE INDICATORS	
Program Effectiveness	
NGO1 – Stakeholder involvement	
	<i>Partially addressed</i> The report provides good examples of the organisation’s stakeholder involvement in key decision making processes. However, information on how the feedback from stakeholders meaningfully affected the decision making process or reshaped policies is missing.
NGO2 – Mechanisms for feedback and complaints	
	<i>Partially addressed</i> The organisation does not have a written policy on external Complaints Mechanisms in place although this is mandatory for all Charter Members, since it is regarded as a key tool to improve the quality of CSO work. This issue needs to be addressed urgently and progress reported for the next review round.
NGO3 – Programme monitoring, evaluation and learning	
	<i>Fully addressed</i> The organisation is commended for a thorough monitoring and evaluation framework at the strategic and operational level which can be seen as good practice for <i>small</i> organisations. More information would be welcome however on how the Results Based Management (RBM) system has led to positive management responses. It would also be interesting to learn more on how the organisation shares its learning with the rest of the sector. The whole section would benefit from being much shorter and more explicit.
NGO4 – Gender and diversity	
	<i>Fully addressed</i> Good information is provided on how ARTICLE 19 addresses and embeds gender and diversity issues into its work programmes and projects. However, links to the mentioned policies as well as indicating explicit targets for inclusion and how these targets can be achieved would have been helpful. There should also be recognition of the great variety of diversity issues like disability, ethnicity, age etc.
NGO5 – Advocacy positions and public awareness campaigns	
	<i>Partially addressed</i> The Charter Secretariat contacted ARTICLE 19 (05.11.2013) which admitted to have forgotten to report on this indicator and submitted an answer (15.11.2013). The answer provides information on how ARTICLE 19 arrives at public awareness and advocacy

<p>positions. Information on the process for corrective adjustments or for exiting a campaign is however missing. Evidence that stakeholders are content with the organisation's advocacy work is welcome in the next report.</p>
<p>NGO6 – Coordination with other actors <i>Partially addressed</i></p> <p>While some relevant information is given, it is not clear if ARTICLE 19 systematically conducts a situational analysis when entering new projects to determine: Who is already active in this context and what are the criteria for choosing strategic partners which optimally leverage the organisation's input? It would be interesting to know how ARTICLE 19 makes its programme plans well known to others to allow for optimal cooperation and how lessons learned are shared with others.</p>
<p>Economic</p>
<p>NGO7 – Resource allocation <i>Partially addressed</i></p> <p>More information on the concrete tracking system, its process and the standards that are applied across jurisdictions would be welcome. ARTICLE 19 is further asked to demonstrate in the next report how its budget process and mechanisms for resource allocation ensure optimal attainment of its strategic priorities, to provide more information on the organisation's expenditures, and a link to its audited accounts.</p>
<p>NGO8 – Sources of funding <i>Fully addressed</i></p>
<p>EC7 – Local hiring <i>Fully addressed</i></p> <p>It is appreciated that all staff (including senior management) in ARTICLE 19's regional or programme offices were recruited from the local/regional community. This can be seen as good practice. However, please provide a link to the Recruitment Policy in the next report.</p>
<p>Environmental</p>
<p>EN16 – Greenhouse gas emission by weight <i>Fully addressed</i></p> <p>It is appreciated that ARTICLE 19 plans to improve performance next year. A graphical presentation of the carbon footprint development over years would be welcome in the next report.</p>
<p>EN18 – Initiatives to reduce greenhouse gas emission <i>Fully addressed</i></p> <p>While it is accepted that ARTICLE 19's work necessitates travelling (leading to CO2 emissions) in order to fulfil its mission, it is still recommended to think strongly about possibilities to reduce the relative output of CO2 and to set ambitious targets to deliver upon.</p>
<p>Labour</p>
<p>LA1 – Total workforce <i>Fully addressed</i></p>
<p>LA10 – Workforce training <i>Partially addressed</i></p> <p>The report provides some information on training for staff in London and Nairobi. However, the average hours of training per year per employee are missing. More importantly the Panel would be interested to know how training needs are systematically identified and how the effectiveness of trainings is evaluated.</p>
<p>LA12 – Performance and career development reviews <i>Fully addressed</i></p> <p>Only 53% of eligible staff received performance reviews in 2012 within the organisation's formal performance management policy. Although the low percentage is well explained, the Panel looks forward to see an increase in numbers, since this is one of the most important accountability responsibilities and organisation has towards its staff. More information would</p>

also be welcome in the next report on how these reviews are effectively linked to the attainment of ARTICLE 19's overall strategic goals.
LA13 – Composition of workforce and governance bodies <i>Fully addressed</i>
Society
SO1 – Impact of operations on communities <i>Partially addressed</i> The Charter Secretariat contacted ARTICLE 19, who submitted the missing information on this indicator on 15.11.2013. Due to the organisation not working directly with local communities, ARTICLE 19 does not provide any detailed information on its impacts of operations on local communities yet. However, ARTICLE 19 plans to assess its impact of work on beneficiaries in 2013 which is appreciated by the Panel. Information on the beneficiaries' feedback and how this led to positive management response is welcome in the next report.
SO3 – Anti-corruption training <i>Partially addressed</i> Whereas good information is provided for UK staff having received training on the newly adopted anti-fraud and bribery policy, information on specific anti-corruption policies and the related training is missing for the rest of staff. Information on how anti-corruption trainings have improved ARTICLE 19's resilience to fraud and bribery are welcome in the next report.
Product Responsibility
PR6 – Ethical fundraising and marketing communications <i>Fully addressed</i>

ARTICLE 19

Gap Analysis Table – Areas of Commitments and Progress achieved

Accountability is a process of continuous improvement. Each year Charter Members in their accountability reports identify and prioritise areas for improvement and corrective actions they plan to take. As of reports submitted in 2014, Members are asked to capture these commitments in this Gap Analysis Table. The Independent Review Panel may suggest the Member to add further issues when reviewing the Member's report. Each year following, the table shall be submitted along with the accountability report and will then be used as a basis to demonstrate progress. The table will be published on the website along with the accountability report and the feedback from the Panel. Please note that the rows where commitments cannot be identified can be deleted from the table.

GRI – Performance Indicators	2012	2013	2014	2015
Program Effectiveness				
NGO3: System for program monitoring, evaluation and learning.	In report covering 2012: <i>“Our RBM progress plan for the next 3 years seeks to strengthen institutional learning and sector-wide sharing (...).”</i> <i>“We are recruiting for a Head of Impact and Evaluation (...).”</i>			
Economic				
-				
Environmental				
EN16/18: Green-house gas emissions and initiatives to reduce these.	In report covering 2012: <i>“(...) we will develop an approach for reducing emissions as well as monitoring them.”</i>			
Labor				
-				
Society				
SO1 – Impact of operations on communities	In report covering 2012: <i>“In 2013 we are looking to implement a component of the Monitoring and Evaluation strategy that would see ARTICLE 19 establish after-action monitoring protocols to</i>			

	<i>determine long-term impact.”</i>			
Product Responsibility				
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