

13 June 2013

Independent Review Panel - Meeting 20 May 2013 in London Letter to the Members in this review round

Dear Salil Shetty,

In May we as the Charter's *Independent Review Panel* met to discuss the reports that had been submitted since our last meeting in October 2012. We would like to thank you for going through this exercise of reporting against the Charter and recognise the commitment to accountability that this demonstrates. We are now writing to provide feedback on your report.

Since we first started assessing the reports we have noticed a marked **improvement in quality** and an improved commitment to accountability. In the last meetings we reviewed some reports of very good quality. However there is still room for improvement in all reports. Enclosed you will find a collection of what we believe to be **Good Practice** in responding to some of the indicators in the GRI reporting framework, including examples from the reports you have submitted in this round. As we feel that part of our role is to encourage organisational improvement we encourage you to look at this document and see the potential in Members learning from each other.

In addition to responding to the indicators in the GRI reporting framework focused on transparency, we would like to encourage Members to include a qualitative assessment of **whether you are satisfied** with the information you are providing and if not, how you intend to improve. We would like you to consider the questions: *What are the challenges each indicator holds for my organisation and how do we deal with these? Do the systems in place work well? How do they contribute to improving your work?* In the cases where you present hard data (for example on diversity or training hours), please consider the following: *Are we pleased with these numbers? How do we want these to change and what actions can we take to facilitate that?* These kinds of explanations are especially welcome where you present weak results or poor data. We hope that this would also encourage use of the reports to facilitate internal discussion of areas for improvement.

With regard to the **complaints handling mechanism** (indicator NGO2), we would like to remind you that it is now mandatory for Charter Members to have such a mechanism in place. This is at the core of good accountability. Such a mechanism should be open for external and internal complaints, outline a clear process, including a timeframe for resolution, and be easily accessible to the intended users. We saw several good examples in the latest set of reports. The reports would however be enriched by examples of the nature of cases dealt with in any reporting period. We would also encourage members to highlight their Charter membership and the commitments that it represents on their website by uploading the Charter logo and linking to the Charter alongside their complaint handling mechanism.

We understand that it is a challenge for global organisations to report on the operations of national entities, but we strongly encourage you to provide an explanation on the structures and processes you have in place to ensure that **global accountability standards** are upheld at a national level and, if they are not, how you tackle this issue. Many reports are relatively strong on policy but much weaker on evidence and selected examples of how this works in practice. How do you use **lessons learned** to improve your programmes?

We welcome cases where organisations make commitments for the future and identify areas for improvement. The newly introduced **Gap Analysis** table is a useful tool to easily track

commitments and achievements made in your organisation. We have included the commitments we could identify when going through your report and would like to encourage you to keep working with this document and submit it again along with your next report.

Finally we would like to inform you that we have decided to focus our attention to some specific areas in the 2014 review rounds. This will be communicated to the entire membership shortly but we would like to provide you with this information at this point already:

➤ **Policy – practice – assurance**

We can see that the reports are improving with regard to accountability measures you take, but are also interested in getting a better understanding of the extent to which this leads to improvements in performance. In our view many reports are good in providing an overview of policies in place. They are however less strong in showing that these are implemented systematically in practice and often relatively weak when it comes to evidence of assurance. Although we acknowledge that of the three - policy, practice and assurance - that latter is most difficult it is also a very important one and we encourage you to work further on this area.

➤ **Advocacy**

Being adequately accountable for our advocacy work is of crucial importance for the legitimacy of NGOs. Nevertheless many reports are relatively weak in this area. It is not totally clear which processes are in place to arrive at advocacy positions, how partners and other stakeholders are involved, how the correctness of the claim is ensured, if there are clear plans for how to exit a campaign and how lessons learned are feed in to the improvement of further work. We see potential for mutual learning through discussions around these questions and encourage all Members to participate in the Charter's workshop on this topic by the end of this year.

➤ **Communication**

We believe the reports should be written for and actively discussed with your trustees, your staff, partners, beneficiaries and other key stakeholders. Only when people know about your commitments and performance against them will they react and help you to improve even further. Often the reports are addressed to the Panel and any other audience is not immediately evident. Against this backdrop we would also welcome more information on how you handle the results of the reporting process, how they are discussed within the organisation, whether they facilitate discussion of areas for improvement, if they lead to an agreed action plan and how they are brought to the attention of the Board.

Organisation-specific feedback to Amnesty International

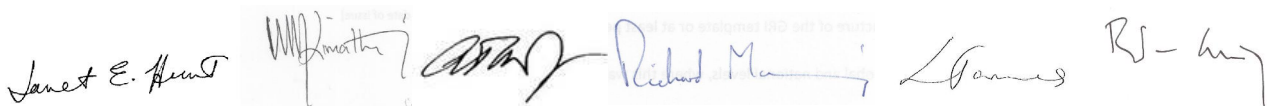
We think that your report is very good. It gives a clear picture of where your organisation stands, including the changes you are currently going through. We commend the extent to which you follow up on the commitments made in earlier reports and encourage you to continue doing this in the future (see Gap Analysis table). We also applaud that you are striving to report for your entire movement and acknowledge the challenges linked to this. We would however in several cases have appreciated your own assessment of the information you provide. How satisfied are you with your performance and how do you intend to improve? We think that the numbers you have provided are sometimes not over-impressive (for example under NGO4) and it would have been interesting to learn more about how you intend to improve. Given their importance to Amnesty's work we would also have liked to see a more in-depth explanation of the role of your stakeholders and partners.

How do you select them and define their role? Finally, we are looking forward to hearing more about how you communicate your work, commitments and achievements linked to accountability, internally as well as externally. We are interested in learning more about within what contexts the Charter is discussed and whether and how you use it as a tool to drive organisational development.

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.

Should you have any comments we would appreciate a response by 12 July 2013.

Yours sincerely,

A row of six handwritten signatures in black ink. From left to right: Janet E. Hunt, Wambui Kimathi, Tony Tujan, Richard Manning, Louise James, and Brendan Gormley.

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

5th Review Round, May 2013
Note on accountability report
Amnesty International

COMMENTS ON PREVIOUS REPORTS

1 & 2. Reports covering 2007 and 2008, not reviewed	
<i>Developed in the interim reporting framework.</i>	
3. Report covering 2009, reviewed in March 2011	
Panel feedback	<ul style="list-style-type: none"> - The report is viewed as good, in particular with regard to the level of completeness. - There is a clear institutional commitment to accountability. - The organisation is encouraged to provide, on a selective basis, more evidence in future reports.
Member's comments	<i>None.</i>
Member's commitments for the future	The commitments that were captured in the pre-screening process have been included in the Gap Analysis Table below.
3. Report covering 2010, reviewed in April 2012	
Panel feedback	<ul style="list-style-type: none"> - The report is very good; it is acknowledged that the organisation has taken into consideration feedback from previous round. - There is a clear institutional commitment and the report is very complete, however could have been stronger with more examples. - The Panel looks forward to hearing about the progress on the ambitious Global Sustainability Program. - It is noted that although positive that the organisation offers anti-corruption training, only a small proportion of the staff attended during this reporting period
Member's comments	<i>None.</i>
Member's commitments for the future	The commitments that were captured in the pre-screening process have been included in the Gap Analysis Table below.

COMMENTS ON THIS REPORT

Reporting period: Calendar year 2011

Did the Secretariat contact the organisation before forwarding the report to the Panel?

- Yes
 No

Summary of Profile Disclosures reported on	
<i>Recommended (total 28)</i>	28
<i>Additional</i>	0
Total	28

Profile	Comments
Strategy and Analysis	
1.1	<i>Fully addressed</i> The organisation should be commended for being clear on progress and next steps within different areas.
Organisational Profile	
2.1	<i>Fully addressed</i>
2.2	<i>Fully addressed</i>
2.3	<i>Fully addressed</i>
2.4	<i>Fully addressed</i>
2.5	<i>Fully addressed</i>
2.6	<i>Fully addressed</i>
2.7	<i>Fully addressed</i>
2.8	<i>Fully addressed</i> The organisation now includes data on number of employees and volunteers.
2.9	<i>Fully addressed</i>
2.10	<i>Fully addressed</i>
Report Parameters	
3.1	<i>Fully addressed</i>
3.2	<i>Fully addressed</i>
3.3	<i>Fully addressed</i>
3.4	<i>Fully addressed</i>
3.5	<i>Fully addressed</i>
3.6	<i>Fully addressed</i> The organisation indicates that unless stated otherwise the report covers the entire organisation.
3.7	<i>Fully addressed</i>
3.8	<i>Fully addressed</i> However, this would have been a suitable place to provide more information on the process of how data that feeds into the report is collected from the national entities.
3.10	<i>Fully addressed</i>
3.11	<i>Fully addressed</i>
3.12	<i>Fully addressed</i>
Governance, Commitments, and Engagement	
4.1	<i>Fully addressed</i>
4.2	<i>Fully addressed</i>
4.3	<i>Fully addressed</i>
4.4	<i>Fully addressed</i> The organisation now provides a list of topics raised via the mechanisms given.
4.14	<i>Fully addressed</i>
4.15	<i>Fully addressed</i>

Summary of Performance Indicators reported on	
<i>Recommended (total 18)</i>	18
<i>Additional</i>	0
total	18

Indicators	Comments
Program Effectiveness	
NGO1 - Stakeholder involvement	<p><i>Fully addressed</i></p> <p>However, the Panel is interested in getting a better understanding of how these mechanisms affect the relationships with partners and evidence how well the organisation thinks its processes work.</p>
NGO2 - Mechanisms for feedback and complaints	<p><i>Fully addressed</i></p> <p>This seems to be a good system; however it would have been interesting to have had more information on how the organisation communicates and uses these mechanisms internally and externally.</p>
NGO3 - Program monitoring, evaluation and learning	<p><i>Fully addressed</i></p> <p>The organisation has now included examples of adjustments made to programmes. The Panel applauds the organisation for the thorough follow up on commitments made in earlier reports.</p>
NGO4 - Gender and diversity	<p><i>Partially addressed</i></p> <p>The information provided illustrates organisational commitment to diversity. The organisation continues to progress with its Gender Action Plan and Roadmap for Diversity and the Panel looks forward to hearing more about these in future reports. This report includes more information than last year, including an example of an action taken in response to lack of gender diversity in Africa. However, the report does not identify standards or norms. The Panel would have welcomed a comment on how satisfied the organisation is with the numbers presented, in particular with regards to the representation of women in governance bodies.</p>
NGO5 - Advocacy positions and public awareness campaigns	<p><i>Fully addressed</i></p> <p>The organisation has taken on board the feedback on the last report and provided a comprehensive explanation of the procedure taken when closing a case (i.e. exit strategy). It should however be noted that 52% of the entities follow the international advocacy positions.</p>
NGO6 - Coordination with other actors	<p><i>Partially addressed</i></p> <p>The organisation states its internal requirement at the planning stage to identify potentials, overlaps and gaps with regard to other actors. There are no formal processes in place to promote learning from others; this is routinely addressed on an informal basis. More detailed information on these processes is lacking. Given the importance of partners in the organisation's work, the Panel suggests that you might usefully review whether this needs to be addressed through more formal procedures.</p>
Economic	
NGO7 - Resource allocation	<p><i>Fully addressed</i></p> <p>The information provided is similar to that given last year, with the addition of a section</p>

<p>describing the new Strategy and Evaluation unit, managing the allocation process with a view to rolling out the planned Resource Allocation Mechanism in 2013. The organisation indicates the intention to review the effectiveness of the new system in the future at a point deemed to be most useful.</p>
<p>NGO8 - Sources of funding <i>Fully addressed</i> As in previous years the information is complete and presented in a clear way.</p>
<p>EC7 - Local hiring <i>Fully addressed</i> The organisation indicates that local hiring is common practice, although there is no formal policy in place. New offices in Brazil and India have been entirely locally staffed. The organisation states that a very small percentage of Directors across the movement are not local.</p>
<p>Environmental</p>
<p>EN16 - Greenhouse gas emissions <i>Fully addressed</i> As noted in the previous report, not all the national entities reported on their emissions. The Panel wishes to congratulate the organisation on the reduced emissions that are recorded.</p>
<p>EN18 - Initiatives to reduce greenhouse gas emissions <i>Fully addressed</i> The information provided is comprehensive and gives many examples of CO2-reducing measures. The organisation acknowledges that it should do more to reduce its office emissions.</p>
<p>Labour</p>
<p>LA1 - Total workforce <i>Fully addressed</i></p>
<p>LA10 - Workforce training <i>Partially addressed</i> The organisation now provides information on average training hours per employee per year, which is a notable improvement. However, the answer states that it does not track training by employee category, the information is not broken down by volunteers and the hours of training for the whole organisation are not included. The Panel however recognises the challenge linked to reporting this kind of data.</p>
<p>LA12 - Performance and career development reviews <i>Fully addressed</i> However, it should be noted that only 45% of staff received performance and career development reviews. Again, it would have interesting to have had a comment on how satisfied the organisation is with this apparently low percentage.</p>
<p>LA13 - Composition of workforce and governance bodies <i>Fully addressed</i> As in the previous reporting round the information provided is detailed and clearly presented. This can be seen as <i>Good Practice</i> for larger organisations.</p>
<p>Society</p>
<p>SO1 - Impact of operations on communities <i>Partially addressed</i> Comprehensive information is provided. The organisation finalised its Impact Assessment Toolkit during the reporting period and expects that it will ensure effective stakeholder engagement throughout the project cycle. The organisation also began to move its London-based staff to hubs in the Global South, in an effort to enable closer work with rights-holders</p>

and local partners. However, it does not include information on whether the mechanisms have been effective, or on how feedback has reshaped policies/programmes. The Panel looks forward to hearing in future reports more on how effective the organisation thinks these measures have been.

SO3 - Anti-corruption training

Fully addressed

The organisation has begun to develop anti-corruption policies and procedures and commits to finalise these in 2012 and implement them in 2013. Percentage of staff receiving anti-corruption training is given, however it should be noted that this was only 3%.

Product Responsibility

PR6 - Ethical fundraising and marketing communications

Fully addressed

More information is provided in this report than the previous. The organisation reiterates its intention to review adherence to the policies in 2013 and again in more detail in 2015.

Amnesty International 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	Commitment to improvement	Progress achieved Year 1	Progress achieved Year 2	Progress achieved Year 3
Program Effectiveness				
NGO1: Processes for involvement of affected stakeholder groups.	In report covering 2010: <i>“As part of its on-going efforts to greater stakeholder engagement, we will be looking into more participatory research methods as well as developing and adapting general participatory methodologies and tools for mobilization of rights holders.”</i>	In report covering 2011: <i>“The Research and Crisis Response Program has produced guidance on the use of participatory techniques and strategies at all stages of the research cycle. [...] The guidelines will be finalised and issued by the end of 2012.”</i>		
NGO3: System for program monitoring, evaluation and learning.	In report covering 2010: <i>“One of the areas we have not addressed is key performance indicators (KPIs) and corresponding targets for the Integrated Strategic Plan (see 2.2 below). We have drafted these KPIs and are in the process of defining global targets for the rest of the Integrated Strategic Plan in place until end 2015. We are planning to roll this out in 2012 and we will report our progress on this in our next</i>	In report covering 2011: <i>“Because of [challenges of consistency across the organisation of definitions, standards and processes], more time has been needed to standardize these global KPIs [...] in 2012, we plan to finish the identification of a set of measurable KPIs and establish processes for how this information can be collected. In 2013, we</i>		

	<i>report to the Charter.”</i>	<i>expect to roll out the measurement and reporting of these KPIs.”</i>		
NGO4: Measures to integrate gender and diversity into program.	In report covering 2009: <i>“We launched a gender action plan in 2003 and are planning a second edition for release in 2011. Additionally we are currently working on a road map that will enable all entities to ensure that we are competent in addressing diversity and our practices model inclusiveness.”</i>	In report covering 2010: <i>“A Gender Action Plan and a Roadmap for Diversity were adopted at our 2011 International Council Meeting.”</i> <i>“We will be hiring a project manager in 2012 to coordinate the implementation of both the Gender Action Plan and the Roadmap for Diversity.”</i>	In report covering 2011: <i>The organisation states its plan “to roll out both the Gender Action Plan and Roadmap for Diversity in 2013.”</i> <i>“The International Secretariat is currently recruiting a programme manager to manage this initiative and we expect that the programme manager will be in post by early 2013.”</i>	
Economic				
NGO7: Resource allocation.	In report covering 2010: <i>“The International Executive Committee will undertake an interim evaluation in early 2013 of this resource allocation mechanism to ensure it is operating as planned.”</i>	In report covering 2011: <i>“A new unit [...] has been established in 2012 [...] to manage the allocation process as well as monitoring, evaluation and reporting. The new system for allocating resources will therefore be rolled out from 2013 onwards. The exact timing of [the planned] evaluation will be decided based on when it will be most useful from a learning perspective.”</i>		
Environmental				
EN18: Initiatives to reduce greenhouse gas emissions and reductions	In report covering 2009: <i>“In addition to promoting to all entities to track carbon emissions, we are also planning to launch in 2011 a global</i>	In report covering 2010: <i>“We, as a movement, are currently designing a global sustainability program of work. We are aiming</i>	In report covering 2011: <i>The organisation reports on progress with regards</i>	

achieved.	<i>environmental sustainability policy and corresponding guidelines for carbon reduction initiatives and targets. We will focus first on the largest 25 entities, which account for over 90% of our global resources and carbon emissions.”</i>	<i>to (1) gain an accredited carbon reduction, energy efficiency award; (2) demonstrate commitment to efficiencies, reductions and awareness with new annual goals; and (3) build staff awareness and involvement in sustainability issues.”</i>	to their Global Sustainability Program and outlines next steps to be taken (p. 19). <u>Further commitment:</u> “We need to do more to reduce our office CO2 emissions.”	
Labor				
LA1: Total workforce, including volunteers.	In report covering 2009: “As we will start collecting detailed staff and volunteer information from all of our sections and structures in 2011, we are aiming to provide breakdowns by type, contract and region in our next GRI report.”	In report covering 2010: The organisation now provides breakdowns for staff by type, contract and region, but not yet for volunteers. “We did not collect volunteer/intern composition information (full-time vs. part-time, length of service) last year as we focused on staff composition first. We will collect volunteer/intern composition information in 2012 for our next GRI report.”	In report covering 2011: The organisation now provides information on number and type of volunteer.	
LA10: Average hours of training per year per employee by employment category.	In report covering 2010: “We currently do not collect training hours globally and plan to start doing so in 2012 for our next GRI report.”	In report covering 2011: The organisation now provides a figure for average hours of training per employee per year based on reporting from 85% of entities. They do not track this according to employee category.		
LA12: Percentage of employees receiving regular performance and career development reviews.	In report covering 2009: “As we will start collecting this information from sections and structures in 2011, we are aiming to provide this information in our next GRI report.”	In report covering 2010: The organisation now reports on this indicator, indicating that 46% of the staff received performance and career development reviews.		

Society				
<p>SO1: Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities.</p>	<p>In report covering 2010: <i>“We will be developing an impact assessment toolkit, which outlines our principles and methodologies to measure and improve the impact of our work.”</i> <i>“One area of work where we need to improve on is regarding the planning and implementation of exit strategies. We have started to think about these in advance of a campaign or project coming to an end; and in fact it is an aspect that project plans now have to detail before the project even starts.”</i></p>	<p>In report covering 2011: <i>“The Impact Assessment Toolkit was finalized in 2011 [...] for all entities of the movement to adopt.”</i> The Impact Assessment Toolkit ensures <i>“stakeholder input during planning (both project entry and exit), monitoring and evaluation stages are fed directly to the project teams at all project stages”</i>. The organisation also reports this year more fully on exit strategy under NGO5.</p>		
<p>SO3: Percentage of employees trained in organization’s anti-corruption policies and procedures.</p>	<p>In report covering 2009: <i>“As we will begin collecting these data from all entities in 2011 our GRI report in 2012 will include fuller information to cover all 69 entities.”</i></p> <p>In report covering 2011: <i>“In 2012 we aim to finalize the anti-bribery policy to ensure the International Secretariat’s full compliance with the UK Bribery Act 2010 and the INGO Accountability Charter. We plan to implement the finalized policy fully in 2013 including communicating and training all staff of the International Secretariat.”</i></p>	<p>In report covering 2010: The organisation now reports for all entities.</p>		
Product Responsibility				
<p>PR6: Programs for adherence to laws, standards, and voluntary</p>	<p>In report covering 2010: <i>“We also decided to review our global fundraising policies and procedures and this is a priority for 2012”.</i></p>	<p>In report covering 2011: <i>“We will review the implementation and adherence to [our] global</i></p>		

codes related to ethical fundraising and marketing communications.		<i>fundraising policies in 2013 and conduct a more detailed evaluation at the end of the plan period in 2015.”</i>		
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