

13 June 2013

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

Dear Dr Stephen Fisher,

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.

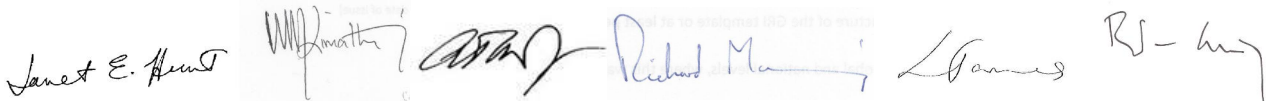
Organisation-specific feedback to Oxfam Hong Kong

Given that this is your first report against the GRI NGO SS framework it is rather complete with regard to policies and procedures. However, there is not much information on the implementation of these which means that your report could be stronger on evidence. We would like to understand better how you move from introducing policies to improving your work. We note that you report on a number of indicators in addition to those recommended by the Charter and it would be useful to understand the rationale behind these choices. Do you collect and/or use this information in any other way? Furthermore, we would have welcomed more input on and a clearer distinction between key partners on the one hand and stakeholders on the other.

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,



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

**5th Review Round, May 2013
Note on accountability report
Oxfam Hong Kong**

COMMENTS ON PREVIOUS REPORTS

1. Report covering 2009, reviewed In March 2011	
Panel feedback	-The report was very brief, rather a supplement to the annual report and developed in the Interim Reporting Framework format. - The Panel saw signs of institutional commitment and encouraged the organisation to move to the GRI reporting framework.
Member's comments	<i>None.</i>
Member's commitments for the future	<i>None identified in this review round.</i>

COMMENTS ON THIS REPORT

Reporting period: 2011 / 2012

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

- Yes
 No

Comment: The Secretariat asked the organisation to explain why it has not submitted a report since 2011; it responded that due to staff turnover and limited resources, it had not been able to develop a report. Please note that where national affiliates of organisations report, the parent organisations are responsible for ensuring that the national affiliates report according to the requirements. The Secretariat also asked for a clarification on the numbers given under indicator LA10 and the organisation provided this.

Summary of Profile Disclosures reported on	
<i>Recommended (total 28)</i>	28
<i>Additional</i>	3
Total	31

Profile	Comments
Strategy and Analysis	
1.1	<i>Partially addressed</i> The statement includes relevant information; however, it lacks reference to accountability/sustainability and provides limited information on the broader trends affecting the organisation, key events, achievements/failures or views on performance.
Organisational Profile	
2.1	<i>Fully addressed</i>
2.2	<i>Partially addressed</i> The organisation reports on its primary mission but is more inspirational in tone and does not give any information on its specific activities to work towards this.
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>
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>
3.7	<i>Fully addressed</i>
3.8	<i>Fully addressed</i>
3.10	<i>n/a</i>
3.11	<i>n/a</i>
3.12	<i>Fully addressed</i>
Governance, Commitments, and Engagement	
4.1	<i>Fully addressed</i> However, it would have been interesting to learn more about the 31 members you refer to, whether those are organisations or individuals and what the criteria for membership are.
4.2	<i>Fully addressed</i>
4.3	<i>Fully addressed</i>
4.4	<i>Partially addressed</i> Information is provided as to how internal stakeholders can provide recommendations to the highest governance body; however, it is not stated how the organisation informs its employees about the working relationship with formal representation bodies such as working council.
4.6*	<i>Fully addressed</i>
4.8*	<i>Partially addressed</i> Information on relevant standards is provided; however, information on the degree to which these are applied across the organisation and how they relate to international standards is lacking.
4.13*	<i>Fully addressed</i> The organisation should be applauded for including this information, which can be seen as material although not included in the collection of compulsory reporting components.
4.14	<i>Fully addressed</i>
4.15	<i>Partially addressed</i> Information is provided on processes for selecting participants from communities to involve in implementation and evaluation of programmes and partner organisations to work with; however, information on processes for engagement with the other identified stakeholders is lacking.

* : Profile Disclosures from the GRI NGO SS, which have been reported on in addition to the ones recommended by the INGO Accountability Charter.

Summary of Performance Indicators reported on	
<i>Recommended (total 18)</i>	18
<i>Additional</i>	18
Total	36

Indicators	Comments
Program Effectiveness	
NGO1 – Stakeholder involvement	<p><i>Partially addressed</i></p> <p>Information on processes for including stakeholders in different phases of programmes is provided; however, information on how decisions are communicated to stakeholders; and how feedback from stakeholders has affected the decision making process or reshaped policies/procedures is lacking.</p>
NGO2 – Mechanisms for feedback and complaints	<p><i>Partially addressed</i></p> <p>Information on policies and procedures in place is provided; however, information on how complaints are assessed and response actions determined is lacking. The organisation states that it does not have systems in place to obtain aggregate information at central level about complaints or feedback. A fully functioning complaints handling mechanism is a Minimum Standard for every Charter Member thus it is strongly recommended to develop this further.</p>
NGO3 - Program monitoring, evaluation and learning	<p><i>Partially addressed</i></p> <p>Information on the relevant policies in place is provided; however, information on how results from these procedures contribute to internal learning; how these have lead to adjustments of policies/programmes; and how these have been communicated is lacking.</p>
NGO4 - Gender and diversity	<p><i>Partially addressed</i></p> <p>Information on relevant policies in place is provided; however, these refer mainly to gender and less to other diversity types. Furthermore, information is lacking on tools for diversity analysis or actions taken in program design to achieving gender and diversity goals.</p>
NGO5 - Advocacy positions and public awareness campaigns	<p><i>Partially addressed</i></p> <p>Some information on the processes for arriving at advocacy positions is provided; however, these are described rather vaguely. Furthermore, information on how the organisation ensures that consistency is maintained during implementation and its public criticisms are fair/accurate; examples of where corrective actions have been taken; and the process for exiting a campaign is lacking.</p>
NGO6 - Coordination with other actors	<p><i>Partially addressed</i></p> <p>Some information on the processes for identifying potential for duplication or opportunities for partnerships with other organisations is provided; however, this is rather vague. Furthermore, information is lacking on processes that promote learning from others. The organisation should be commended for including details of contributions by other donors when working with partners.</p>
Economic	
NGO7 - Resource allocation	<p><i>Not addressed</i></p> <p>The report refers to the financial section of the Annual Report but this does not include any information on processes in place for tracking use of resources.</p>
NGO8 - Sources of funding	<p><i>Fully addressed</i></p>
EC1* - Direct economic value generated and distributed	<p><i>Partially addressed</i></p>

<p>The report refers to the financial section of the Annual Report and this includes information on income and expenditure; however, lacks more detailed information on operating costs; total employee costs; bank costs; or tax payments.</p>
<p>EC4* - Significant financial assistance received from government <i>Fully addressed</i> The organisation should be applauded for including this information, which can be seen as material although not included in the collection of compulsory reporting components.</p>
<p>EC7 - Local hiring <i>Partially addressed</i> The organisation states that it has a clear commitment to employ from the local community as far as possible; however the answer lacks information on the proportion of senior management in locations from the local community.</p>
<p>Environmental</p>
<p>EN7* - Reducing indirect energy consumption <i>Partially addressed</i> Information on initiatives taken to reduce energy use is provided; however information on indirect energy use in the categories given in the description of the indicator; the extent to which energy use could be reduced; or methodologies used for calculations is lacking.</p>
<p>EN16 – Greenhouse gas emissions <i>Fully addressed</i> The Panel notes that the emissions have increased compared to the earlier reporting period and would have welcomed information about how the organisation intends to decrease these.</p>
<p>EN18 – Initiatives to reduce greenhouse gas emissions <i>Fully addressed</i></p>
<p>EN28* - Fines and sanctions for non-compliance with environmental laws and regulations <i>Fully addressed</i></p>
<p>Labour</p>
<p>LA1 – Total workforce <i>Partially addressed</i> Complete information on the workforce, including volunteers, is provided, for which the organisation should be commended. However, information on the different categories of volunteers by function is lacking.</p>
<p>LA3* - Employee benefits <i>Partially addressed</i> Information on benefits offered to parts of the workforce is provided; however, an overview of the total benefits offered to the staff is lacking.</p>
<p>LA4* - Collective bargaining agreements <i>Fully addressed</i></p>
<p>LA10 – Workforce training <i>Partially addressed</i> Information on average training hours per employee per year is provided; however, the total hours devoted to training is lacking. The organisation is asked to clarify whether it is correct that “professional and technical officers” received 508 hours of training during the reporting period, as this amount of hours raised some discussion as to whether this was the correct figure or whether there was an error</p>
<p>LA12 – Performance and career development reviews <i>Fully addressed</i></p>

<p>LA13 – Composition of workforce and governance bodies <i>Partially addressed</i> Some of the requested information is provided. The organisation however states that it does not record age for members of its Board and that the concept of minority groups is not valid since Hong Kong has no form of national citizenship. The Panel encourages the organisation to interpret this indicator on diversity more broadly. This is about exclusion and marginalisation and should be reported on beyond constellations of citizenship. The organisation does not report on any further diversity indicators.</p>
<p>LA14* - Ratio of basic salary of men to women by employee category <i>Partially addressed</i> Information on the ratio of salary of men to women is provided; however, information on the level of the basic salary is lacking.</p>
<p>Human Rights</p>
<p>HR3* - Human rights training <i>Partially addressed</i> Information on the human rights training that some employees have received is provided, however information on the percentage of employees trained is lacking.</p>
<p>HR4* - Discrimination <i>Fully addressed</i></p>
<p>Society</p>
<p>SO1 – Impact of operations on communities <i>Partially addressed</i> Information on policies and procedures is provided, however more detailed information on how data is collected; how community members are selected; the number of programmes to which these policies apply; whether they have been effective in mitigating negative and/or maximising positive impacts and how feedback has informed steps forward is lacking. The organisation should be commended for considering “unintended consequences”; it would however have been interesting to learn more about what happens to this information.</p>
<p>SO2* - Risk analysis: corruption <i>Partially addressed</i> Information on procedures for managing risks with regard to corruption is provided and the organisation mentions the programmes that are reviewed for this risk, however information on the number/percentage analysed for this risk is lacking. Despite this, the organisation should be applauded for including this information, which is material although not included in the compulsory reporting components.</p>
<p>SO3 – Anti-corruption training <i>Partially addressed</i> The organisation states that its whistleblower policy is explained to all inductees; however, it does not mention anything on a further anti-corruption policy.</p>
<p>SO4* - Actions taken in response to corruption <i>Fully addressed</i></p>
<p>SO5* - Public policy: positions and participation <i>Fully addressed</i> However, this indicator has not been developed for organisations within which advocacy belongs to the core activities.</p>
<p>SO6* - Engagement in political funding <i>Fully addressed</i></p>

<p>SO7* - Legal actions for anti-competitive behaviour, anti-trust and monopoly practices <i>Fully addressed</i></p>
<p>SO8* - Fines and sanctions for non-compliance with laws and regulations <i>Fully addressed</i></p>
<p>Product Responsibility</p>
<p>PR2* - Non-compliance with regulations and codes concerning health and safety <i>Fully addressed</i></p>
<p>PR6 – Ethical fundraising and marketing communications <i>Partially addressed</i> Information on the code of practice applied in the organisation is provided; however, information on the frequency with which the organisation reviews its compliance with this standard; on the number of complaints for breaches of standards for fundraising and marketing communication practices in relation to the rights of affected stakeholders or the rights of donors is lacking.</p>
<p>PR7* - Non-compliance with regulations and codes concerning marketing communications <i>Fully addressed</i></p>
<p>PR8* - Complaints regarding customer privacy and data <i>Fully addressed</i></p>

* : Performance Indicators from the GRI NGO SS, which have been reported on in addition to the ones recommended by the INGO Accountability Charter.

Oxfam Hong Kong 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				
NGO2: Mechanisms for feedback and complaints in relation to programs and policies.	In report 2011/2012: <i>"We do not yet have the systems in place to obtain accurate aggregate information at a central level about complaints or feedback on our development or humanitarian programme design, conduct, principles, or procedures."</i>			
Economic				
-				
Environmental				
-				
Labor				
-				
Society				
-				
Product Responsibility				
-				