



**Accountable  
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# **Greenpeace International Independent Review Panel Feedback**

**Accountability Report 2016  
Review Round April 2018**



# **Greenpeace International**

## **Feedback from the Independent Review Panel**

### **Review Round April 2018**

**18 May 2018**

Dear Bunny McDiarmid and Jennifer Morgan,

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.

Greenpeace International's ninth accountability report demonstrates an overall institutional commitment to accountability evident particularly in the opening statement by International Executive Directors (IEDs); Jennifer Morgan and Bunny McDiarmid.

The Panel's feedback has been taken on board in some areas, whilst in others the Panel has been repeating the same requests or suggestions for several years – largely in relation to making policies available online and demonstrating that these are effective in practice. Greenpeace is encouraged to provide some form of response to these points, even if it is to explain why the Panel's suggestions cannot or will not be implemented.

Examples to illustrate how some processes work in various national and regional offices (NROs) were appreciated by the Panel. However, in some areas it was difficult to gain a full understanding of formalised and systematic approaches to issues. This was compounded by the fact that links were not provided to the policies mentioned throughout the report – and do not appear to be available on Greenpeace's website. Particularly when multiple references are made, e.g. to the new Framework which will guide the organisation's work over the next decade, being able to read the relevant policies would have been helpful. The Panel repeats numerous previous requests to provide access to these policies in the next report, and encourages Greenpeace to make key policies available publicly on its website. The Panel also encourages Greenpeace to provide more information about whether the policies and processes it has in place actually achieve the intended impacts.

The panel welcomes the improvements made in NGO1 in relation to the involvement of stakeholder groups in campaign planning.

Areas of weakness remain feedback and complaints mechanisms (NGO2), coordination with other actors (NGO6), procedures for local hiring (EC7) and impact on local communities (SO1). These are detailed further in the accompanying



improvement analysis and should form the basis for Greenpeace's next interim report. The panel would in particular like to highlight the need for improvement in the feedback and complaints handling mechanism, and for greater transparency regarding policies and strategic plans.

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 8 June 2018.

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

Yours sincerely,

Mihir Bhatt

John Clark

Louise James

Jane Kiragu

Saroeun Soeung



# Greenpeace International's Accountability Report 2016

## Review Round April 2018

### PROFILE DISCLOSURES

#### I. Strategy and Analysis

1.1	<p><b>Statement from the most senior decision-maker</b></p> <p><i>Fully addressed</i></p> <p>Greenpeace International's co-Executive Directors Jennifer Morgan and Bunny McDiarmid again provide a compelling opening statement highlighting Greenpeace's achievements throughout 2016.</p> <p>An organisation-wide consultation led to the development of a new framework which maps the way Greenpeace will work over the next ten years. A link to this framework would have been appreciated.</p> <p>The Panel appreciates that people power is at the heart of Greenpeace's strategies, and that stronger collaborations will be developed with stakeholders.</p> <p>Information on the role accountability plays in the framework, as well as in Greenpeace's overall work and decision-making processes, was unfortunately missing. The Panel would like to read about this in the next report.</p>
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#### II. Organisational Profile

2.1 – 2.7	<p><b>Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience</b></p> <p><i>Fully addressed</i></p>
2.8	<p><b>Scale of organisation</b></p> <p><i>Fully addressed</i></p> <p>Greenpeace is again commended for achieving a huge increase in supporter reach (people who follow, like, tweet, take action etc.) from 47.3 million in 2015 to 63.3 million in 2016.</p>
2.9	<p><b>Significant changes in the organisational structure</b></p> <p><i>Fully addressed</i></p>



	<p>Following a review of management set-up in 2016, a flatter Strategic and Management team was created, consisting of nine positions. The Panel would like to know more about the division of responsibilities between the two IEDs.</p>
2.10	<p><b>Awards received</b></p> <p><i>Fully addressed</i></p> <p>Greenpeace International and several NROs can be commended for winning a number of awards in the reporting period.</p>
<p><b>III. Report Parameters</b></p>	
3.1 – 3.4	<p><b>Reporting period / Date of most recent report / Reporting cycle / Contact person</b></p> <p><i>Fully addressed</i></p>
3.5	<p><b>Reporting process</b></p> <p><i>Fully addressed</i></p> <p>Reporting is planned six months before the reporting period commences, with the set-up of internal information and data gathering processes. How does this create awareness and commitment to accountability throughout the organisation?</p> <p>The report is shared with all national and regional organisations (NROs) and staff and is uploaded to the Greenpeace website. The Panel repeats its question from its previous feedback letter about how Greenpeace plans to expand communication of the report to other stakeholders. The panel also encourages more proactive discussion with the NROs and other stakeholders around the report as a means of driving change and increasing accountability</p> <p>The panel notes that the report says that Greenpeace takes on board and acts on the panel recommendations; however the panel would highlight that that is not always the case as there are still outstanding areas that have not been sufficiently progressed.</p>
3.6 – 3.8	<p><b>Report boundary / Material content limitations / Basis for reporting on national entities, joint ventures and subsidiaries</b></p> <p><i>Fully addressed</i></p> <p>The report covers Greenpeace International as well as Greenpeace's 26 NROs. All NROs provide narrative reports and data as part of the reporting process.</p>



3.10 – 3.11	<p><b>Significant changes from previous reporting periods</b></p> <p><i>Fully addressed</i></p>
<p><b>IV. Mission, Values, Governance, and Stakeholder Engagement</b></p>	
4.1	<p><b>Governance structure</b></p> <p><i>Fully addressed</i></p> <p>Greenpeace's governance structure is explained in detail on the <a href="#">organisation's website</a>.</p>
4.2 – 4.3	<p><b>Division of power between the governance body and management / Number and independence of members of highest governance body</b></p> <p><i>Fully addressed</i></p> <p>The Greenpeace International Council, composed of Trustees from each of the NROs is the highest governance body. The Board of Directors of Greenpeace International takes decisions on strategic and campaign issues, and evaluates the Executive Directors annually. The Board is appointed by the Council. Board members hold non-executive roles. Are there also independent members of the Board?</p>
4.4	<p><b>Feedback from internal stakeholders</b></p> <p><i>Addressed</i></p> <p>The response to this question is identical to the previous report. The Panel therefore repeats its requests from previous feedback letters to explain how Greenpeace ensures meaningful dialogue between its internal stakeholders and the Board. Are there examples of positive management response to issues raised by members or employees? Furthermore, the Whistleblower Policy available on Greenpeace's website refers to a Whistleblower Alert Centre, but no contact information is provided.</p>
4.5	<p><b>Compensation for members of highest governance body</b></p> <p><i>Fully addressed</i></p> <p>The salaries and/or other compensation paid to the Senior Management Team, Executive Directors, and Board Members are presented in an open and detailed way. The panel notes the cap on compensation that the council has implemented.</p>
4.6	<p><b>Conflicts of interests</b></p> <p><i>Fully addressed</i></p>



	Greenpeace has solid policies on conflict of interest in place. Do all relevant staff and board members comply with the policy? Were there any significant conflict of interest issues to address in the reporting period?
4.10	<p><b>Process to support highest governance body's own performance</b></p> <p><i>Addressed</i></p> <p>The performance of the International Board is assessed by a Council Governance Committee composed of Council Trustees. Board members complete self-evaluations and receive feedback from their peers.</p> <p>Previous reports referred to 360 degree evaluations with surveys sent to Council Trustees and GPI management in addition to the self-evaluation surveys. Is this no longer the case? Are the processes which are in place effective in practice?</p> <p>The report notes that it is best practice for the NROs to complete evaluations, but do they know if NROs are actually doing this?</p> <p>Furthermore, the Panel continues to question why the performance of the Greenpeace International Council is not evaluated.</p>
4.12, 4.14	<p><b>Social charters, principles or other initiatives to which the organisation subscribes / List of stakeholders</b></p> <p><i>Fully addressed</i></p>
4.15	<p><b>Basis for identification of stakeholders</b></p> <p><i>Fully addressed</i></p> <p>Stakeholder analysis is a key element of project design and is part of project management training. The Panel repeats its request from previous feedback letters to explain how this has led to improvements in Greenpeace's work in practice – noting that this is mentioned to some degree under NGO1 below.</p>

## PERFORMANCE INDICATORS

### I. Programme Effectiveness

NGO1	<p><b>Involvement of affected stakeholder groups</b></p> <p><i>Fully addressed</i></p>
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	<p>In late 2015 and early 2016, Greenpeace strengthened its efforts to understand and consult with their stakeholders, including gathering input from the public and supporters as well as staff on its long-term strategy. Of particular note is the Big Listening project and the Campaign Accelerator Training.</p> <p>Increasing audience understanding and establishing open campaign processes are key pillars of Greenpeace's engagement goals. The techniques used to achieve these goals are outlined, with helpful examples provided from some national and regional organisations illustrating how this has helped Greenpeace's work. It is welcomed that this shows how changes were made as a result of the consultations.</p>
NGO2	<p><b><i>Mechanisms for feedback and complaints</i></b></p> <p><i>Partially addressed</i></p> <p>Greenpeace International implemented an External Complaints Policy in 2015 (the Panel repeats its request for a link) but is yet to develop practical procedures to support the objectives of the policy. This was first expected in 2016 and was then pushed to 2017. The same applies to a Global External Complaints Policy – clarification on how this differs from the regular External Complaints Policy mentioned above would be welcome.</p> <p>An initial search of Greenpeace International's website suggests that the policies/processes still have not been finalised as of April 2018, and no information is given to stakeholders about how they might lodge a complaint. The Panel requests an update on this including a concrete timeframe for completion of the policies/mechanisms, rollout to NROs, as well as how Greenpeace intends to make the complaints policies broadly known and accessible.</p> <p>It is reported that 10 NROs have their own complaints policies in place, and data from these is provided. It is explained that Greenpeace is working on improving the consistency of the questions it poses to NROs when gathering data for this accountability report, as 15 NROs provided complaints data in 2015, and it is not anticipated that NROs have dropped their complaints policies in the meantime. This makes it difficult to gauge to what degree the number of complaints has changed year on year.</p> <p>In 2016, most public complaints (38%) related to Greenpeace's strategy, methods or tactics and advocacy positions. The majority of supporter complaints (45%) were about fundraising methods or tactics. The Panel would be interested in knowing whether Greenpeace's efforts to involve stakeholders in strategy and campaign design processes has any impact on the number or proportion of complaints relating to these issues.</p>





	<p>The Panel also requests information on what proportion of the complaints received were resolved and whether these resolutions were also satisfactory to the complainants. Does Greenpeace have an independent arbitration mechanism in the event that complainants are not satisfied with Greenpeace's response?</p>
NGO3	<p><b><i>Programme monitoring, evaluation and learning</i></b></p> <p><i>Addressed</i></p> <p>Whilst the response outlines high level processes to change and evaluate Greenpeace's programme monitoring, evaluation and learning, details of a systematic process are not provided. It is therefore difficult to gauge exactly how Greenpeace monitors and evaluates projects, makes adjustments as needed, to what degree stakeholders are involved in these processes, and how processes shape learning and feed organisational decision-making.</p> <p>In 2016 the Performance, Accountability and Learning (PAL) Unit developed a new three-year strategy to align with Greenpeace's new Framework. More details about the new strategy are requested, particularly how it will achieve the four aspirations the framework lays out for a solid foundation of data and knowledge. It would be useful to understand to what extent Greenpeace feels it has made progress to a solid foundation of data and knowledge, it seems like some made but there is recognition that there is still quite some way to go?</p> <p>The PAL Unit has led the review of Greenpeace's new operating model, with individual project evaluations in 2016 and a full evaluation of the operating model planned for 2017. The Panel looks forward to reading about the findings in the next report.</p> <p>The previous report stated that the PAL Unit is mandated to develop a global toolkit to inform a standardised approach to MEL within Greenpeace. This report states that monitoring and evaluation processes still need to be systematised. How is Greenpeace working towards this cohesive approach, beyond the PAL Unit monitoring and supporting NROs individually?</p> <p>It is stated that new initiatives to publicise evaluation results and other organisational learning were implemented in 2016. An example is webinars where project leads debrief evaluation results. Who are these webinars aimed at? How have they been received? Is there evidence that these efforts have had a positive impact? The Panel can highlight Restless Development's practice of publishing project evaluations <a href="#">on their website</a> as a good practice.</p>



NGO4	<p><b>Gender and diversity</b></p> <p><i>Partially addressed</i></p> <p>The Panel welcomes the information provided here – however the response focuses on diversity and inclusion within Greenpeace as an organisation, whereas this question rather aims to explore the integration of “gender and diversity into programme design and implementation, and the monitoring, evaluation, and learning cycle”. Are there any policies or processes relating to diversity and inclusion in Greenpeace’s programmes and the stakeholders Greenpeace works with? How do these affect project planning, implementation, and monitoring?</p> <p>Regarding internal diversity and inclusion: Greenpeace’s seven Diversity and Inclusion Principles were adopted in 2015. A link was not provided but the principles appear to be available <a href="#">online</a>. Is there a more comprehensive policy accompanying the principles which outlines how Greenpeace aims to implement/strengthen progress on the principles? The panel welcomes the appointment of a Global D&amp;I full time position.</p> <p>Are there any targets Greenpeace is working towards? It is stated that a global survey was conducted to establish global and local targets and goals for diversity and inclusion – while some analysis of the degree of D&amp;I achievement in NROs is provided, and general areas for improvement are identified, no specific targets or action plans were stated.</p> <p>A pilot project was planned for 2017, to support the Mexico office to become more diverse and inclusive through team building, coaching and training. The Panel looks forward to the results of this, and to how Greenpeace will roll this or similar initiatives out in other offices.</p>
NGO5	<p><b>Advocacy positions and public awareness campaigns</b></p> <p><i>Addressed</i></p> <p>Project leaders are in charge of formulating advocacy positions, and campaign positions are based on Greenpeace’s mission, values, Framework and globally agreed policies. The International Political and Business Unit ensures that globally agreed policy positions are up to date, and there are several methods of ensuring quality of advocacy positions and campaigns. However, it is not so clear how those policies are created in the first place.</p> <p>Anyone from within Greenpeace can call for a new position or initiate a position review.</p> <p>The Panel also repeats previous requests for information on the process for exiting campaigns.</p>



NGO6	<p><b>Coordination with other actors</b></p> <p><i>Partially addressed</i></p> <p>The response states that a commitment to work with allies in a cooperative and humble way is one of the cornerstones of Greenpeace's Framework, and provides some examples of collaborative efforts at the regional and national levels.</p> <p>However, evidence of a systematic approach is still missing. How does Greenpeace detect and avoid duplication, and identify which other actors to engage with? <a href="#">Sightsavers' partnership framework</a> is a good example to refer to.</p>
<h2>II. Financial Management</h2>	
NGO7	<p><b>Resource allocation</b></p> <p><i>Addressed</i></p> <p>A summary of Greenpeace's 2016 financial statement is provided, with the 2015 figures as a comparison. The accounts are a compilation of the individually audited accounts of all members of the Greenpeace federation.</p> <p>The Panel would welcome information on how the use of resources are tracked, and what internal and external controls are in place to counter the risk of misuse of funds.</p>
NGO8	<p><b>Sources of Funding</b></p> <p><i>Fully addressed</i></p> <p>Greenpeace's funding is entirely made up of contributions from individuals and grants from private foundations, affording Greenpeace important financial independence. Gifts are vetted to ensure they meet Greenpeace's standards of independence.</p> <p>Major donations made in 2015 and 2016 are outlined, though it is not so easy to gain a quick oversight of these figures. A table to accompany the detailed descriptions would assist readers of the report.</p>
<h2>III. Environmental Management</h2>	
EN16	<p><b>Greenhouse gas emissions of operations</b></p> <p><i>Fully addressed</i></p> <p>Greenpeace's greenhouse gas emissions are presented in a detailed table. The Panel is pleased to note that emissions in 2016 were 9% lower</p>



	<p>than in 2015, due mainly to a reduction in paper consumption and business travel.</p>
EN18 – EN26	<p><b>Initiatives to reduce emissions of operations / Initiatives to mitigate environmental impact of activities and services</b></p> <p><i>Fully addressed</i></p> <p>Greenpeace has an Environmental Initiatives Baseline in place with 12 initiatives aimed at reducing the organisation's environmental impact. Whilst three of the initiatives are referred to specifically, a link to the document outlining all 12 is requested in the next report.</p> <p>It is stated that NROs are not centrally made to implement the initiatives, though many are doing so. The response however also states that instead of setting concrete emission reduction targets, Greenpeace is working to minimise emissions by ensuring all NROs implement the Environmental Initiatives Baseline to the full. The environmental performance of NROs are benchmarked against one another – what processes are in place to support them to improve?</p> <p>Greenpeace again has not provided a link to their Environmental Policy, and it appears that this is only available on their intranet. The Panel strongly encourages Greenpeace to make this document public on their website – openness and transparency about efforts in the very area Greenpeace is working on is important.</p> <p>Finally, is there evidence that Greenpeace's efforts in this area are actually leading to improved environmental sustainability?</p>
<p><b>IV. Human Resource Management</b></p>	
LA1	<p><b>Size and composition of workforce</b></p> <p><i>Fully addressed</i></p> <p>Information is provided on Greenpeace staff broken down by permanent and temporary contracts, gender and age. The Panel requests information on geographic representation as well as different responsibility levels (a breakdown by age and gender here would be particularly interesting) in the next report. <a href="#">Educo's report</a> (pg. 35-36) is an example of how this information can be visualised in a table format.</p>
EC7	<p><b>Procedures for local hiring</b></p> <p><i>Partially addressed</i></p> <p>Greenpeace endorsed a set of Compensation and Benefits Principles in 2015 and began implementing them in 2016. A quote from the Principles states that all staff based in a given country will be subject to the same</p>



	<p>compensation and benefits policy, to ensure equity amongst staff in the same NRO. A tool was commissioned in 2016 to align grading systems and allow for benchmarking between NROs.</p> <p>No mention was made of any policies for hiring local staff, including for senior levels. As such the Panel continues to consider this question only partially addressed, and urges Greenpeace to address these issues in future.</p>
LA10	<p><b>Workforce training</b></p> <p><i>Fully addressed</i></p> <p>Greenpeace adopted a new Learning and Development Framework and Strategy in 2016, which takes a broader view of people development than just traditional training – mentoring, coaching and informal learning is also included. The Strategy focuses on skills and competencies Greenpeace identifies as being essential to delivering organisational strategy.</p> <p>The impact of learning and development efforts is assessed through participant evaluations, and sometimes organisational satisfaction is also evaluated. More details on what this looks like in practice, and what the feedback received suggests about the success of the current system, is requested in the next report.</p>
LA12	<p><b>Global talent management</b></p> <p><i>Addressed</i></p> <p>Greenpeace's new Learning and Development Framework and Strategy was designed to support staff development in line with talent needs identified in light of the new strategic direction. A leadership development programme is also in place, based on a global competency framework.</p> <p>An annual performance review process is in place, and at the end of 2016 only two of Greenpeace's 28 entities did not report on annual performance reviews (does this mean those entities do not have performance reviews in place?). Half of the entities have annual performance review completion rates of over 75% of staff. Are there plans in place to improve completion rates?</p> <p>Finally, is there evidence that the mechanisms in place work well in practice?</p>
LA13	<p><b>Diversity of workforce and governance bodies</b></p> <p><i>Addressed</i></p>



	<p>Information is provided on gender ratio in the Board and in management positions. The Panel is pleased to see improvement year-on-year, with the gender ratio at almost 50:50 in 2016.</p> <p>It is stated that age diversity data for management positions is not collected, and no reference is made to other types of diversity. The 2014 report had stated that Greenpeace's Performance, Accountability and Learning Unit was working on improving data collection processes to be able to provide data on other diversity factors such as minority groups or disabilities.</p> <p>The Panel requests more information on this in the next report and repeats its previous suggestion that Greenpeace consider which groups of people should be represented in the organisation (both general workforce and governance bodies) to improve its legitimacy and effectiveness.</p>
NGO9	<p><b><i>Mechanisms to raise grievances</i></b></p> <p><i>Addressed</i></p> <p>Greenpeace does not have a global grievance policy in place, other than its global whistleblower policy, but many NROs have their own procedures. Greenpeace did update its anti-harassment policy in 2016 and expects to introduce further global guidelines as part of its integrity and diversity and inclusion work. This was also stated in the 2014 report, so the Panel would be interested in knowing what the timeline for this is.</p> <p>Whistleblower policies are in place at both the international and NRO level, with 16 NROs having implemented such policies in 2016. The Panel notes positively Greenpeace International's broad approach to the whistleblower process, going beyond illegal activities to encompass malpractice and misconduct.</p> <p>An overview of the whistleblower complaints received in 2015 and 2016 are provided, all of which are reported to have been dealt with. It would be interesting to know how many of the complaints were upheld and what action was taken in response.</p>
<p><b>V. Responsible Management of Impacts on Society</b></p>	
SO1	<p><b><i>Managing your impact on local communities</i></b></p> <p><i>Addressed</i></p> <p>There is a risk analysis process in place for all Global Projects, which includes a risk analysis tool that prompts Project Leads to identify potential impacts of Greenpeace's activities on the wider community.</p>



	<p>There are also principles and protocols in place outlining how to stake risk smartly and non-violently. These are captured in an agreement which is extended to all those with whom Greenpeace works.</p> <p>Examples are provided of how Greenpeace Africa and Greenpeace east Asia engaged with communities during project design and implementation. Some more specifics on how this engagement actually shaped the projects, as well as the kind of feedback received from communities, would be appreciated in the next report.</p> <p>However, the Panel would still like to see more information about how Greenpeace assesses risks and impacts on societies more broadly, beyond a project-by-project basis. How are broader trends and larger risks that might pose strategic or governance risks identified? Are exit strategies in place, and are post-intervention evaluations undertaken? The Panel acknowledges the example of continuous engagement including after a campaign ended in the case of Greenpeace East Asia – are evaluations undertaken for all major campaigns?</p>
SO3	<p><b>Anti-corruption practices</b></p> <p><i>Addressed</i></p> <p>Greenpeace has an anti-corruption policy in place which has been adopted by 22 of its 26 NROs. This is four more than in 2014, which is noted positively. However, how are anti-corruption practices ensured in the NROs which have not adopted the policy?</p> <p>The Panel has made several requests for a link to the anti-corruption policy, and encourages Greenpeace to also make this available on its website. What systems are in place to detect and report on incidents of corruption, bribery, fraud, etc? Is there evidence that the existing policy and processes are well known and effective in practice?</p>
SO4	<p><b>Actions taken in response to corruption incidents</b></p> <p><i>Partially addressed</i></p> <p>The answer states that there is "in principle" a zero tolerance policy on bribery and corruption, effective internal controls and a whistleblower policy. Any incidents of corruption should be reported to the International Executive Director, and violations should be reported to the Chair of the Audit Committee.</p> <p>Is any information on incidents of corruption or fraud published publicly? The report does not state whether any incidents were reported in 2016, and the Panel requests this kind of information be provided in the next report.</p>



## VI. Ethical Fundraising

PR6

### ***Ethical fundraising and marketing communications***

#### *Addressed*

Greenpeace has its own Fundraising Policy which all offices are expected to adhere to. The 2014 report stated that the policy was being expanded upon and would be shared with the Panel in 2015. The 2016 report again states that it is being updated. The Panel strongly recommends that it be published on the website when it is finalised, and requests a link in the next report, or at least an overview of the key points covered.

The Panel repeats its requests from previous years for evidence that the current policy is well known and practiced by all staff, and requests information on any complaints or breaches of the policy in the reporting period.