

## Greenpeace International Response to Independent Review Panel Feedback



Accountable Now

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### **Response to the Independent Review Panel of Accountable Now: Concerning IRP's review of the Greenpeace Accountability Report for 2018**

Dear Independent Review Panel members,

Greenpeace International (GPI) appreciates the Panel's feedback regarding our 2018 report. We thank the panel for highlighting our areas of strength and areas of improvement and recognise how helpful this will be as we continue to strengthen our accountability procedures at GPI.

We would like to take this opportunity to provide our response in relation to some of the panel's feedback on our 2018 report and for recognition of our efforts to include accountability issues in our annual report as well as acknowledging our commitment to dynamic accountability.

A decision was made at GPI, to experiment and combine the Annual Report with the Accountable Now report in an effort to dramatically increase, and champion our levels of transparency and accountability. The Annual Report is by far the most read of all of our reports and by including Accountable Now indicators we are ensuring they reach the largest audience possible and stipulate transparency and accountability as core values for our organisation. We also hope that by including these indicators in the Annual Report we will take a leadership position among NGOs.

There is also considerable crossover in the subject matter covered in these reports; The 2018 GPI Annual Report included reporting in accordance with Accountable Now Indicators. Based on our follow-up call with the panel, it was understood that separate reports are more favorable to the panel. In the next report, we will make sure to consult key stakeholders on the appropriate reporting format to Accountable Now. Regardless of any changes to the future formatting of any reports, we will continue to aim to publish parts of the Accountable Now data in the Annual Report for the above reasons.



The panel's insight on our areas of strength and areas of improvement is well-appreciated and we highly value the feedback of the Independent Review Panel. GPI is continuously improving its efforts towards the twelve accountability commitments.

Our various stakeholders are a priority and we are working hard to make sure that we can be held accountable by them. Regarding our external complaints policy, we are pleased to inform the panel that the process and procedures will be rolled out in Q1 2020. Below, you will find our response to some of the main points highlighted by the panel. We are keen on addressing and incorporating all feedback received for our next report to Accountable Now. We are also pleased to inform the panel that we recently hired an Accountability Manager who will ensure and deliver core accountability processes and reporting for Greenpeace internally and externally.

We are looking forward to submitting our next report and working together with the Panel and Secretariat.

Yours Sincerely,

Jennifer Morgan  
International Executive Director  
Greenpeace International

Edwin Nichols  
Director of the Executive Director's Office  
Greenpeace International

Cluster A	Impact Achieved
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GPI appreciates the panel’s feedback regarding this cluster. Our framework is a key document which guides and prioritises the organisation’s work at a global level. GPI’s 2018-2020 Strategic Plan outlines our functions and priorities. Our global focus and direction for the short- and mid-term are regularly adapted to take into account needs, expectations, new learning and emerging change. Greenpeace International would like to inform the panel that we are currently drafting the 2021-2023 Strategic Plan. We continuously strive to connect our Long-Term Strategic Framework to our day-to-day work.

GPI is making progress in measuring impact. We acknowledge the need to encourage accountability through developing indicators to measure our success. We are currently working on developing our set of success indicators to accompany our 2021-2023 Strategic Plan. This will be agreed in Q4 2020 and implemented in Q1 2021.

One of our key stakeholders are the internal campaigning community who work hard in ensuring impact is achieved. Our Programme Direction Office act as an interface with all stakeholders of the Global Programme to support its smooth functioning, including effective planning, monitoring, evaluation and reporting systems. Our DEVO Department continuously works with Greenpeace National and Regional Offices (NROs) to support them in developing their 3 Year Strategic Plan (3YSP). GPI offers guidance to NROs in that regards. 3YSPs are drafted by NROs and reviewed by GPI. The GPI Stakeholders, led by the NRO Development Manager, engage in the review process of the NRO 3YSP. The goal is to understand the interactions between all the departments to determine if the strategic direction chosen makes sense against the agreed global strategy. In future reports, GPI will provide more information on how its various stakeholders are involved in identifying potential success indicators.

GPI aims for sustainability of its impact through the different work that we do. We stress on the need to work with partners and build capacity to ensure sustainability which is measured by a set of (proxy) metrics. Greenpeace is committed to continue working on more definitive measures to establish if our impact is lasting beyond an immediate intervention. GPI also believes that learning and sharing lessons are an integral part of the way we work. We coordinate this and share outcomes through an evaluation database which is accessible to all our internal stakeholders on the Greenpeace intranet (Greenet). In the next report, GPI will be happy to share more specific learnings, including how they are used to improve the organisation’s work moving ahead.

NROs work with and co-power communities to expose global environmental problems and develop solutions for a green and peaceful future. Careful consideration is always given to ensure our engagement is done right, this may include risks assessments and planning for exit strategies. These policies, engagement strategies and plans are developed at the local level. At the global level, a risk analysis process is in place for all Global Projects (projects that help make

significant progress towards Greenpeace long term goals). This process includes a risk analysis tool that prompts Project Leads to identify potential risks, including possible impacts of our activities on the wider community. As part of this process, strategic support is provided by GPI to assist Project Leads in analysing these risks. Within GPI, the *Essential Principles and Protocols for Legal and Actions* (EPPAL) establishes processes to take risk smartly and non-violently, and identify how these risks are shared between all those involved. EPPAL extends to all those with whom we work. It lays out our commitment to take responsibility for our actions and to make sure that individuals joining actions do so only after a proper briefing and hence with fully informed consent. To promote EPPAL, GPI launched an internal online platform to explain the processes for assessing and communicating risk and the principles underlying them. In addition, our *mass-NVDA guidebook* deals with the informed sharing of risk and the importance of taking responsibility in an informed manner.

We, at Greenpeace, believe that change starts from within. As an independent campaigning organisation that strives to help build a green and peaceful future, Greenpeace has the responsibility to align our organisational mission, values and campaigns with our internal policies. Apart from the different initiatives mentioned in our report, GPI has a travel policy in place. This policy is available on Greenet and provides criteria to apply when planning any GPI activity involving travel (e.g. visits to other offices or selecting meeting destinations). The policy also outlines the procedures to follow before and while undertaking travel, authorization procedures, exceptions and measures for non-compliance, and also acts as a guide for NROs. Ships crew follow a specific Ships travel policy due to the different travel procedures and requirements. We have also developed a new *beta* tool, called the *Greenpeace Meeting Optimiser* to help make smarter choices when it comes to hosting meetings. Developed by Greenpeace UK, it is available on Greenet for anyone in Greenpeace to use. The *GP Meeting Optimiser* is an online tool, which enables staff to quickly identify the best location for meetings, based on the CO<sub>2</sub>, directly related to staff travel options.

Our supporters look to us for guidance and leadership in demonstrating, through our actions, a sustainable and ecological model. Therefore, we commit to a food policy which walks the talk and upholds our organisational integrity. The policy also serves as a guidance for the development of national/regional Greenpeace organisations' food policies.

Greenpeace recognises the enormous scale of the challenge worldwide to end the production of, and reliance upon, the internal combustion engine (ICE) powered car in order for us to have a chance to limit global average temperature increase to 1.5 degrees. We have put a process in place to phase out our own diesel and petrol road vehicles, moving our Greenpeace road fleet away from the Internal Combustion Engine (ICE). In our next report, we will provide an update to this.

Cluster B	Stakeholder Involvement
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GPI appreciates the panel’s feedback regarding this cluster. We, at GPI work, are committed to ensuring accountability to our stakeholders. Greenpeace stakeholders are our financial supporters, volunteers and online communities, plus our staff, research partners, campaigning allies and those local communities we work alongside. In addition, our stakeholders include those whom we seek to persuade such as governments, corporations, individuals and the media, and those who depend on the industries and ecosystems impacted by our campaigns.

Each campaigner and/or project lead identifies key stakeholders as part of research and power analysis conducted in the initial design of a campaign project. With our way of working, the importance of stakeholder analysis has been elevated into a key element of project design and is part of our standardised project management training. Stakeholder analysis should identify and analyse the motivation and needs of specific groups of people, communities and organisations as primary or secondary stakeholders. It explains how we will engage them, why, and whether (or how) we will be accountable to them. The stakeholder analysis assigns these roles to project team members.

Our stakeholders are usually engaged in strategic design processes and in subsequent M&E at an NRO level where working in partnerships is a critical vehicle for magnifying our campaigns. This is done individually by NROs, and occasionally together at a regional (e.g. cross-border European) level. At the international level, stakeholder involvement in strategy creation is more ad-hoc and issue-specific, owing to the fact that as GPI does not implement campaigns itself and cannot create detailed planning and implement partnerships on a large scale. An exception to this is on global tactical cooperation around specific moments, e.g. with 350.org around climate days of action.

As noted in both the Annual Report 2018 and in the 2018-2020 Strategic Plan cited by the IRP, developing success indicators for complex problems and defining attribution is extremely difficult. The development of our new 2020-22 Global Programme Plan has allowed us to start working with NROs to define new develop new global success indicators, which will then be translated into context-appropriate indicators at NRO level. This process is ongoing now but the involvement of new external stakeholders is limited as the indicators are framed within our strategy for the next three year period rather than free-floating.

At Greenpeace, safeguarding our stakeholders is ensured through our integrity measures and policies. Our policies and initiatives at Greenpeace tackle Gender Equality and Diversity throughout the organisation. Greenpeace has a *Model Preventing Discrimination policy*. We have diversity and inclusion principles and each NRO, as part of the Justice, Safety, and Diversity Initiative has been required to have a diversity and inclusion statement. On the recruitment side, we are working on the *Talent Acquisition Project (TAP)*. Greenpeace will provide an update on the TAP in the next report.

Integrity Section on our website has been updated to include the Model Code of Conduct <https://www.greenpeace.org/international/explore/about/values/>

Policies relating to complaints, governance, staffing and operations, as well as evaluations and statistics about NROs in a variety of languages can be accessed through this link <https://www.greenpeace.org/global/>.

To ensure accountability to our stakeholders, Greenpeace has a privacy and cookies page on their website, explaining what data Greenpeace collects, how it is used, stored, and how people can access, amend, or request the deletion of the data relating to them. In addition, Greenpeace is compliant with GDPR requirements as we ensure that all required measures are being implemented. We also have an information security policy that requires our organisation to implement adequate security measures to protect sensitive information. As previously mentioned, there are a number of new policies which have been drafted in 2018 and which are pending approval. These include staff privacy policy, data retention policy, and data breach notification procedure. We will expand on this and provide an update in the next report.

Our internal stakeholders are our employees and volunteers across the globe. In addition to normal management channels, Greenpeace International employees address the management board of GPI (the Board) through its Works Council (*Ondernemingsraad*) for the office staff and for the ships' crew. The Works Council meets with the Board (or a delegation of the Board) at least once a year. For employees of NROs, recommendations or direction can be provided to their respective Boards through the formal governance structure.

The GPI Whistleblower policy outlines how employees can raise concerns about wrongdoing to the whistleblower compliance officer, who is a member of the International Board.

In terms of GPI salaries, GPI has adopted Hay's methodology for grading jobs. Hay has a well-tested system for awarding jobs points based on standardised job descriptions. This grading methodology applies to all positions within GPI except that of the International Executive Director, whose salary is set directly by the GPI Board. However, the IED's job description is written and appraised according to the same (HAY) methodology as all staff job descriptions, and the Board is informed accordingly. Amsterdam-based members of the Strategy and Management Team (SMT), as well as a few other staff, are all in the top band of the GPI salary structure. In 2019, this band is set at EUR 81-108.2k. Members of that group who are located in NROs (as opposed to Amsterdam) are paid according to the senior levels of local salary structures. NRO salaries are set by the relevant NRO and we do not have this information on a global basis. We have a set of *Global Compensation and Benefits Principles*, focused on equity and transparency. Our Global HR team supports NROs, who are responsible for their own salary systems, to apply these principles in the local context.

Greenpeace's gender pay gap, as overall, is caused by under-representation of those identifying as women in more senior positions. Our focus is on improving the likelihood that women are hired into senior roles in the future. Through our Global Talent Acquisition Project, we are setting new standards and practices throughout the full recruiting cycle designed in particular to attract more qualified women applicants and to reduce any hidden bias towards women (or other minority groups).

At Greenpeace we have the honour that our work in pursuit of a green and peaceful future is funded almost entirely by donations given to us by passionate individuals from all over the world who care about the planet, share our values and want to help us create change. Greenpeace supports relationships with third parties that further the aims of Greenpeace, that help defend environmental boundaries, or that help to engage the public and change mindsets, as long they do not compromise the independence of Greenpeace or our financial resilience. If in doubt, and if there could be a justified risk that Greenpeace will jeopardise its independence, we will cease that relationship because our mission is too important. Greenpeace has its own *Policy on Relationships with Third Parties & Fundraising* which all NROs commit to adhere to. This policy is designed particularly to ensure that we adhere to our core principle of independence, but also describes other aspects of ethical fundraising.

GPI does not directly fundraise from the public but supports the efforts of NROs. All fundraising activities conform to the laws of the countries in which these activities take place, and all NROs follow national laws and regulations. In addition, NROs are usually members of, or adhere to, relevant ethical fundraising bodies in their own countries. As independence is one of our core values, it is particularly important for us to be able to assure ourselves and others that we do not take money from those who might seek to influence our campaign choices. We prefer to be transparent about the identity of major donors, but in some cases, donors do not grant Greenpeace permission to publicise the details of their contribution. Gifts made to Greenpeace, including those where anonymity is requested, are vetted to verify that they meet our standard of independence.

GPI appreciates the panel's feedback regarding this cluster. We are continuously striving to ensure increased accountability to our staff, effective use of resources and transparent governance.

In terms of staff composition, in most cases, staff and leadership of NROs are almost entirely local, and if anything we encourage our NROs to increase diversity of representation from other countries in their staffing, rather than the reverse. In addition, there is no "expat" concept in our system. While an NRO hiring a staff member from outside the organisation might provide a few benefits to support those individuals to relocate to the country concerned, they are hired on local terms and conditions. The only exception to this is in *ad hoc* cases of secondment (an assignment of less than three years).

We strongly believe in empowering and training our staff. Greenpeace provides a robust learning environment for our staff. This includes providing formal programs such as training programs that cover areas of campaigning, leadership, project management and line management at all levels through the *Global Learning and Development* (L&D) team and specialist L&D staff in Greenpeace offices. In addition, we provide ongoing learning support for the full life cycle of the employee including, inductions, mentoring, coaching as well as peer to peer learning opportunities such as regional and global skillshares. Our focus is on strengthening the capacity of NRO staff to deliver programmes as well as supporting and strengthening the capacity of NROs to undertake their own learning and development goals and objectives.

On a GPI Level, personal and team training needs are identified on a personal level through Greenpeace International's Performance Management system. Organisation wide needs are prioritized by the SMT and the Director of People & Culture with the goal to support organisation wide development. GPI L&D assesses management learning needs with the SMT & Sr. Manager and support units in finding the best supplier for their own learning needs - when training is the answer. All GPI staff participate in compulsory trainings such as *Integrity & Respect* and *Courageous Conversations*. Every staff member has been on one of these the last couple of years. In addition to this, there is a dedicated training budget per person. GPI also offers different trainings such as *Intercultural Feedback Training*, *Management Foundations* and *Future Leadership Programme*. In addition to this, units can organise external training themselves and GPI Learning and Development uses external providers who provide Greenpeace/GPI tailor made programmes to our staff.

On a global level, all NROs have some form of a performance management system. That said, some are more comprehensive than others but all have a section of the appraisal which identifies the learning needs and the planned interventions (e.g. structure learning through training, mentoring, coaching, experience based or shared learning). In addition some opportunities arise throughout the year that are not identified through the performance management system where



a strategic offering is made based on either directional areas (e.g. the next and greatest thing on a specific concept or work area) or more planned interventions (e.g. the global L&D team might make an additional offer in a region for a number of offices that are related to key objectives like the Climate Leadership training in Asia). Project Management, Line management, Campaigning, Community Capacity Building and more additional specialised skill trainings are offered through each professional area (e.g. finance training offered by the finance department, specific corporate campaign training offered by the Programme Team etc). Greenpeace also works in partnership with a lot of different vendors at an international level and national/regional level.

We are currently working on an interlinked database, Learning Management System, across NROs to identify the number of staff that undertake training and development every year. This has been softly launched and a hard launch is set around Q2 2020. An update to this is anticipated in our next report to the panel.

At Greenpeace, we have a different set of policies to ensure accountability across the organisation. New policies are normally decided by the IED after consultation within the organisation. The IED is responsible for ensuring that the Board is fully informed of such policies. Where new policies have major implications for the organisation, they are referred to the Board for approval. The IED, in consultation with the Board Chair, is responsible for judging which proposed policies should be referred to the Board and for recommending to the Board the course of action it should take. For GPI Integrity Policies, the Integrity team works on this and the list of policies that needs to be reviewed. These policies are brought to the Board for sign off. Greenpeace International is currently working on a decision-making matrix tool. The purpose of this tool is to offer a clear, simple, and streamlined decision-making path for all processes happening at GPI across the different departments. It aims to map all those decisions, to make sure that they all follow the same process and to enhance transparency in decision-making.

The highest governance body of GPI is the *Greenpeace International Council* (the Council), composed of one representative - a Trustee - from the board of each NRO. The Council's role includes the responsibility to elect and remove the GPI Board. The Chair of the Council is normally also the Chair of the GPI Board. The GPI Board approves GPI's budget and audited accounts and appoints and supervises Greenpeace International's Executive Director. This Board is also responsible for decisions on wide-ranging strategic and campaign issues: deciding organisational policy; approving the Global Programme planning process, approving the opening of new NROs; ratifying decisions of the Council in their *Annual General Meeting* (AGM); and granting the right to use the Greenpeace trademark to new Greenpeace entities. Board members hold non-executive, supervisory roles. Each NRO is also governed by its own Board of Directors who have a supervisory role. GPI has a *Board Audit Committee* (BAC) which is a formal sub committee of the board. The Finance and Audit Committee is established by and reporting directly to the Board of Stichting Greenpeace Council. It acts as an advisory service to the Board to assist in the effective discharge of specific board decisions, mainly fiduciary.

Under Dutch tax law, the policy setting body of a charitable organisation may receive no remuneration beyond a refund of incurred expenses and a non-excessive compensation for time spent. GPI complies with that requirement under Dutch tax law. In addition to this, the Council in the AGM also capped the amounts Board members and Board Chair may claim compensation for. Details of remuneration given to Board members are published every year in our Annual Financial Report.

Board Evaluation is the responsibility of the Governance Committee, a sub committee of Trustees. This evaluation takes into account documentation provided by the GPI Board, such as its self-evaluation, division of tasks and responsibilities, performance criteria, time sheets and minutes.

The IED is responsible for the management of Greenpeace International and provide leadership to the global network (of Greenpeace organisations). The IED leads the GPI SMT. The IED is strategically advised by the Global Leadership Team and the Executive Directors' Meeting (EDM). The Board evaluates the IED once a year based on a 360 degree assessment. The results are owned by the People and Culture Department and shared with the entire Board and the IED.

More information on Greenpeace's management structure can be found on the following link <https://www.greenpeace.org/international/explore/about/governance/>

At Greenpeace, we have a comprehensive integrity system in place. The Greenpeace Integrity system was approved in June 2017, at which point offices started the implementation of the system in their country, and we started taking on integrity cases using our newly approved protocol for handling such violations. In 2018, a number of our staff came together to suggest improvements to our system, based on their experiences and perception of the system, but also on the events we were witnessing in the media at the time - the incidents of sexual harassment at Oxfam, and the #metoo movement amongst others. Their suggestions were unanimously agreed at our Executive Directors meeting in June 2018. The first initiative, Restoring Justice, encourages our staff who have experienced sexual harassment in the past ten years to come forward, so that we may address those cases as quickly as possible. For the second initiative named 'Upgrade our Systems', we prioritised and resourced the integrity functions, updated our definitions of harassment and sexual harassment to be more explicit, confirmed a zero-tolerance stance towards harassment, sexual harassment and discrimination, we made the integrity system more accessible and clear and we implemented an appeals process for where investigative processes a) do not exist, b) have been followed but found, upon marginal testing, not to have been applied fairly, or c) implicate a NRO Board member. Our NROs were also asked to create a mandatory training around the *Code of Conduct* to clarify the acceptable behaviour expected in the workplace. We have seen many of our NROs implement further trainings such as *Courageous Conversations*, *Unconscious Bias* or bystander interventions. We organised a global training for the mandatory Persons of Trust function, which is there to support staff in their questions around integrity concerns. We started collecting data mid-2018, retroactively back to 2017. A review of our data collection was conducted to evaluate the additional information that

would be useful about our integrity cases. So far in 2019, we found that there were still cases brought forward as integrity complaints that could better be handled by other mechanisms such as HR grievance, mediation or a courageous conversation. The Integrity Officers and Persons of Trust received additional information on those mechanisms, so they could in turn inform the people they are supporting. We have also started engaging our volunteers and direct dialogue communities more closely, so they receive the same level of information and training about our system as our office staff members do. Our report indeed provides an overview of all complaints received. However, given the low number of incidents, Greenpeace is not able to provide a detailed overview of complaints by categories. This helps to ensure protection and confidentiality.

GPI acknowledges the panel's concern regarding the external complaints policy and procedure. GPI Integrity Office is currently working in conjunction with Global Engagement Department to develop the process and procedures for the External Complaints Policy that has already been developed by the GPI Integrity Office. This is expected to be completed and implemented during Q1 2020. An update on this is anticipated in the next report.

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**Greenpeace is an independent global campaigning organisation that acts to change attitudes and behaviour, to protect and conserve the environment and to promote peace.**

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