

Feedback from the Independent Review Panel

Review Round November 2015

16 December 2015

Dear Thomas Hughes,

Many thanks for submitting your INGO Accountability Charter report. In times of conflict and climate change, when civil society organisations (CSOs) have an increasingly important role to play, the space for civil society is shrinking in many parts of the world. Strong accountability and the demonstration that we “walk our talk” have never been more important. It is also against this background that the Charter has initiated an alliance with seven national CSO accountability frameworks to strengthen our collective voice as we devise a shared [Global Standard for CSO Accountability](#).

Before providing you with an individual assessment of your report, there were some issues that arose in all or many reports that the Independent Review Panel wants to share with you:

Getting fit for the digital age

Digitisation allows for unprecedented connectivity. At a time when citizens have increased levels of agency and literacy this is a game changer in the way CSOs work. Mobilisation and relationship building with large numbers of people to *co-create* the change they want to see is at the heart of most new CSO strategies – particularly in campaigning. Working *with*, not *for* stakeholders, is not just seen as the right thing to do, but also as the most impactful.

Important in this evolution is moving ICSOs from transparency to actively sharing information, from consultation to joint decision making and from taking responsibility for others to sharing mutually defined responsibilities.

The Charter has initiated the [Digital Accountability project](#) and Amnesty International, Greenpeace, Oxfam, Transparency International and others are already intensively involved in this project. We look forward to more cooperation with and among Member organisations on this particular issue and for these issues to be addressed more in future reports.

Globalisation / National level accountability

Decentralisation processes usually place more responsibility and capacity at the national level. To ensure an ICSO presents a unified, coherent voice and can protect its brand, a strong and globally shared understanding of mutual accountability is key. Thus, decentralisation often goes hand in hand with a stronger mandate for the ICSOs' global accountability mechanisms. These should help national entities build capacity in the accountability practice, and also demand stronger delivery on global commitments. Charter Members are encouraged to ensure that all their entities adhere at least to the following minimum standards: transparency, effective and independent oversight, involving people we serve, coordination with partners, sound financial management and impact focus.

Inclusion and diversity

Many Charter Members still focus mainly on gender when demonstrating their accountability in terms of diversity. This is a lost opportunity. As we all know, there is also discrimination on the basis of disability, age, ethnicity, etc. Actively reaching out to these constituencies will strengthen their rights and their participation. For example, positive action can increase the

employment of those with disabilities or from minority ethnic groups. Such inclusion is central to a human rights based approach, but may also improve results by tapping into a wider base of experience. For further advice, click [here](#) on the outcome of a Charter webinar on inclusion or [here](#) to look at some good practice examples of Charter Members.

Please ensure that all points listed above are taken into consideration when further developing your accountability practices in the coming months and collecting data for the next INGO Accountability Charter report.

Organisation-specific feedback to ARTICLE 19

ARTICLE 19's third accountability report is very good, comprehensive and has improved from previous years. The organisation has clearly reflected on last year's Panel feedback letter and on the identified areas for improvement (Improvement Analysis) – now providing more details, evidence and links on these issues. In particular, it is appreciated that ARTICLE 19 has developed a Complaints Policy including steps for resolving received complaints. Information would be welcome on the number and types of complaints received and if complaints have been resolved in a satisfactory manner in the next report.

In terms of **institutional commitment** to accountability, the report provides convincing insights on the importance of accountability that guides the organisation's decision-making and strategic thinking. They use the power of access to information to hold decision-makers to account for their actions. Improvement to the consultation for Policy development (page 2 of the report) indicates improved commitment to more accountable practices. Good **evidence** that policies work well in practice is provided in some areas and could be further improved in others (e.g. showing that staff grievance was resolved satisfactorily).

The greatest **weaknesses** or missing issues are outlined in the **Improvement Analysis**: The scarcity of information on how the various policies generate positive effects in practice, providing evidence that staff concerns raised were resolved satisfactorily (NGO9), sharing information on the *general* approach of responsibly accessing and assessing the direct and indirect impact of their activities (SO1), and increasing the number of staff that receives anti-corruption trainings (SO3).

On the positive side, the organisation is commended for their process of using external risk management consultants to assist them in assessing case specific risks (4.1), for their critical and thoughtful review of salaries (4.5) as well as their overall stakeholder engagement (NGO1), which can all be seen as **Good Practice**. The organisation reported again on a number of additional indicators that are not mandatory for Charter Members but positively noted by the Panel.

As noted in previous years, all Charter Member organisations are requested to publish the Charter logo and a link to its website on their own websites. ARTICLE 19 is highly encouraged to do so on their "finance and accountability" webpage ([here](#)). On the page on their website they reference the mechanisms to which they are accountable in the UK but make no reference to the Charter. The Panel suggests that ARTICLE 19 could take the paragraph from page 1 of their accountability report for this purpose.

Overall, ARTICLE 19 is commended for a very high level of transparency and accountability to its key stakeholders. Due to this high quality, the Panel suggests **reporting every two years against the Charter commitments from now on**. In a very brief interim report for the year 2015, the Panel would only like to see an updated CEO statement, any crucial changes in comparison to 2014, and information on progress highlighted by the Panel in this year's Improvement Analysis.

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 our [website](#). However, should there be errors of fact in the feedback above or in the note below; we would of course wish to correct these before publication. Please share these comments or amendments by 20 January 2016.

If you have any other feedback or comments on our work, please share them with us by sending them to the Charter Secretariat. We are also available for bilateral conversations with Members' senior leadership team and look always forward to hearing your views.

Yours sincerely,

Three handwritten signatures in blue ink. The first is "Louise James", the second is "Michael Röska", and the third is "Jane Kiragu".

Louise James · Michael Röska · Jane Kiragu

Three handwritten signatures in black ink. The first is "Rhonda Chapman", the second is "John Clark", and the third is "Saroeun Soeung".

Rhonda Chapman · John Clark · Saroeun Soeung

Review Round October 2015
Cover Note on Accountability Report

ARTICLE 19

Reporting period: Calendar year 2014

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	<p>Statement from the most senior decision-maker <i>Fully addressed</i></p> <p>The report's opening statement from ARTICLE 19's CEO Thomas Hughes provides again a convincing insight on the importance of accountability at the heart of the organisation's work. Accountability guides the organisation's decision-making and strategic thinking as they use the power of access to information to hold decision-makers to account for their actions. It is furthermore appreciated that ARTICLE 19 seeks to embody accountability by holding themselves open and accountable to different internal and external stakeholders. As in the previous year, the Panel positively notes ARTICLE 19's helpful focus on accountability for performance in their appraisal system.</p> <p>The Panel looks forward to hearing more on the development of the organisation's strategic planning process using an open-source wiki as well as on how they become more near-real time, e.g. with the support of an organisational digital project management system which allows for a quick review of the status of their work and guide management decision-making. The Charter has a new project on Digital Accountability and ARTICLE 19 is welcome to get involved.</p>
II. Organisational Profile	
2.1 – 2.7	<p>Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience <i>Fully addressed</i></p> <p>The first and potentially second paragraph of their geographical structure (page 4) does not really add much value to the report. The Panel thus suggests that ARTICLE 19's report would be more concise if these paragraphs were deleted in the future. This section also duplicates indicator 2.5.</p>
2.8	<p>Scale of organisation <i>Fully addressed</i></p> <p>ARTICLE 19 provides comparable data for the last four years. A continuous increase of staff, total income, net revenue, total assets and annual expenditure is noticed. A brief note in this regard (i.e. opportunistic funding or deliberate strategic growth?) would be helpful in this regard. The number of consultants went down from 51 to 42 and the Panel would be interested to know if this was for any particular reason.</p> <p>Moreover, does ARTICLE 19 work with volunteers?</p>

2.9 – 2.10	Significant changes / Awards received <i>Fully addressed</i>
III. Report Parameters	
3.1 – 3.4	Reporting period / Date of most recent report / Reporting Cycle / Contact person <i>Fully addressed</i>
3.5	Reporting process <i>Fully addressed</i> ARTICLE 19 is commended for drafting an action plan based on the Panel's feedback, which is signed off by the Deputy Executive Director. Different teams/departments were delegated responsibility for drafting sections of the report; comment, verification and input was sought across departments including regional offices and opportunities for collaboration were identified and acted upon.
3.6 – 3.7	Report boundary / Specific limitations <i>Fully addressed</i> The Panel notes that ARTICLE 19 is a relatively small organisation with limited resources that would enable reporting comprehensively on every required indicator. The report does not include activities of ARTICLE 19's partner organisations not directly or indirectly managed by ARTICLE 19.
3.8	Basis for reporting <i>Fully addressed</i> It is again appreciated that ARTICLE 19 incorporates the Charter's accountability principles in the memorandums of understanding (MOU) established between the international and regional offices. MOUs are based on ARTICLE 19's governance documents (e.g. articles of association, international constitution) as well as on their core values of accountability and transparency. The Panel would be interested to know to what extent ARTICLE 19's policies are binding on the independent offices.
3.10 – 3.11	Reporting parameters <i>Fully addressed</i> As a follow-up from last year's Panel feedback, net asset figures now include current and fixed assets.
3.12	Reference table <i>Fully addressed</i> A reference table is not necessary since ARTICLE 19 follows the usual GRI structure and numbering
IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	Governance structure <i>Fully addressed</i> Relevant information on ARTICLE 19's specific governance structure and responsibilities is provided. The organisation took on board last year's Panel feedback and shares details on their risk management processes – internally and with the support of external risk consultants for specific risks. Noteworthy information is provided on how the global coordination of ARTICLE 19 entities

	<p>across the world is strengthened (e.g. signed MOUs with offices in Brazil, Mexico and the USA) to ensure the governance structure better supports overall impact and financial stability.</p> <p>ARTICLE 19 is particularly commended for their risk analysis and management approach, which includes a risk registry, assessment of risks to staff and allocation of responsibilities for responding to risks. Given the rise in terrorism and other threats to foreign and local personnel, this unfortunately is of increasing importance and ARTICLE 19's approach may offer a useful model and is seen as Good Practice for other organisations.</p>
4.2 – 4.3	<p><i>Division of power between the governance body and management / Independence of Board Directors</i> <i>Fully addressed</i></p> <p>The information outlined a clear and functional governance structure, supported by management and with appropriate measures to ensure independence in place.</p>
4.4	<p><i>Feedback from internal stakeholders</i> <i>Fully addressed</i></p> <p>General information about mechanisms for internal stakeholders to provide recommendations is shared. Staff provided recommendations and direction to the Board in the process to develop ARTICLE 19's new strategy in 2014. In a participatory process, including working groups and a wiki, a culminated set of formal recommendations was discussed by the Board and shaped their decision-making. A link to the new strategy would be welcome in the next report.</p>
4.5	<p><i>Compensation for members of highest governance body</i> <i>Fully addressed</i></p> <p>ARTICLE 19 started in 2013 to review its salaries and significant salary shortfalls in some offices were identified. The process used to undertake this review was outlined in detail, providing clear information on the data collection, comparative standards and analysis. A second benchmarking exercise was commissioned in 2014. Interestingly, the CEO salary was excluded from the review to ensure that salary ratios were not increased. This review and the endeavour to align itself with other ICSOs can be seen as Good Practice.</p> <p>Finally, the Panel would be interested to know if there are any departure arrangements in place.</p>
4.6	<p><i>Conflicts of interests</i> <i>Addressed</i></p> <p>The answer given is the same as in the previous report. While it is full and comprehensive information is shared, more detail demonstrating how this policy is applied in practice is required, for example, how this is checked at each Board meeting as well as sharing their conflict of interest approach for staff (especially senior management), not just trustees. ARTICLE 19 has shared the mentioned Conflict of Interest Policy with the Panel.</p>
4.10	<p><i>Process to support highest governance body's own performance</i> <i>Fully addressed</i></p> <p>ARTICLE 19 can be commended for completing an external governance review in 2013, which identified skills-gaps that led to the appointment of three new Board members. Further information is provided in 2.3. More details from the external</p>

	<p>review of ARTICLE 19's governance and from the skills audits in 2013 and 2014 would be appreciated. The Panel looks forward to outcomes from the governance committee to review Board membership and performance.</p> <p>Overall, information in missing on term limits and appointment procedures.</p>
4.12	<p><i>Social charters, principles or other initiatives to which the organisation subscribes</i> Fully addressed</p>
4.14	<p><i>List of stakeholders</i> Fully addressed</p> <p>ARTICLE 19 can be again commended for providing a very detailed list of their stakeholders (partnerships and beneficiaries).</p>
4.15	<p><i>Basis for identification of stakeholders</i> Addressed</p> <p>While the answer provided states the importance of working in partnerships with local groups to promote and implement institutional, cultural and legal change, a systematic approach of stakeholder identification and prioritisation is not evident. Some information can be found in the last paragraph of NGO1. Last year's report mentioned a new strategic planning process that should start in 2014 where ARTICLE 19 would clarify their criteria by which stakeholder analysis and influence mapping is carried out. The organisation is strongly encouraged to share progress updates in this regard in the next report.</p>
4.16 – 4.17	<p><i>Moved to NGO1.</i></p>

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	<p><i>Involvement of affected stakeholder groups</i> Fully addressed</p> <p>As in the previous feedback, ARTICLE 19 is commended for engaging stakeholders in the whole project cycle management process, using different formats of involvement and supporting strong collaboration throughout. Good evidence is given on how the engagement processes have influenced projects and decision-making, e.g. having managed a greater gender balance of participants in workshops in Brazil by taking into account the specific needs and schedules of women when organising these trainings. ARTICLE 19 have also demonstrated contemporary approaches to incorporating partnerships in their M&E methodologies. This response can be again regarded as Good Practice.</p> <p>The Panel looks forward to ARTICLE 19's organisational guidelines and staff trainings on stakeholder engagement to ensure that lessons learnt are shared.</p>
NGO2	<p><i>Mechanisms for feedback and complaints</i> Addressed</p> <p>It is very much appreciated that ARTICLE 19 has worked on developing a written complaints policy, which is mandatory for all Charter Members. The described stages for handling a complaint appear complete and thoughtful; however, it will be</p>

	<p>helpful to link directly to the policy in future reports (once this is updated) and actively communicate it well to staff. In the meantime, the Panel appreciates that the Complaints Policy was shared with them and that the organisation identifies this area, particularly to enable partners to raise concerns, for future development.</p> <p>The Panel advises ARTICLE 19 to ensure its website makes it easy to locate its Complaints and Whistleblower Protection Policy and its Code of Conduct. Information is missing on the number and types of complaints received and if complaints have been resolved in a satisfactory manner in 2014. Moreover, staff grievances or harassment at work as well as Whistleblower Protection should be reported under NGO9 which focuses on internal complaints and feedback.</p>
NGO3	<p><i>Programme monitoring, evaluation and learning</i> <i>Fully addressed</i></p> <p>As in previous years, ARTICLE 19 is commended for a well-developed monitoring and evaluation system at the strategic, operational and reporting level which has re-shaped management decisions. The Results Based Management (RBM) system has allowed tracking the delivery of the organisation’s projects against what they have planned in their 5-year strategy (e.g. recognising where fundraising efforts have to be prioritised). A mixed methodology for M&E more broadly incorporates good practices designed to provide analysis the advocacy and partnerships components of programmes as well as beneficiary feedback. The Panel looks forward to hearing more about the development of ARTICLE 19’s new 6-year strategy as well as on their new project management process and system implemented in 2015.</p>
NGO4	<p><i>Gender and diversity</i> <i>Addressed</i></p> <p>Relevant information is provided on how ARTICLE 19 embeds gender analysis and other diversity issues into programmes, projects and its six-year global strategy. The report describes how the various strategies address gender and diversity in different contexts and cultures and in its programme design. As mentioned last year, some evidence that women journalists’ activities led to impact in this regard and feedback from training modules would be appreciated.</p> <p>Whereas it is positively noted that throughout 2014, ARTICLE 19 ensured that gender is comprehensively integrated and states that other factors inhibiting participation (such as race, ethnicity, age) are addressed in programmes, the organisation is invited to describe how they address broader diversity and inclusivity issues in programmes, strategy and M&E. Respecting and celebrating diversity is also part of ARTICLE 19’s Code of Conduct which is appreciated by the Panel.</p>
NGO5	<p><i>Advocacy positions and public awareness campaigns</i> <i>Fully addressed</i></p> <p>ARTICLE 19 addresses major relevant issues and has worked to be more strategic with advocacy interventions, with descriptions of examples demonstrating their achievements included in the report. However, their formalised campaign planning, monitoring and evaluation processes (incl. corrective actions or strategies for exiting a campaign) are still in development, and are planned for implementation in 2016. It is evident that advocacy is key to ARTICLE 19’s values and theory of change. Evidence is provided how feedback shaped their Post-2015 campaign.</p>

	Overall, the response would profit from being more succinct.
NGO6	<p>Coordination with other actors <i>Addressed</i></p> <p>The answer provides relevant information on the avoidance of duplication and how ARTICLE 19 works in consortiums to leverage each other's expertise (e.g. UNHCR). Working in partnership is a key plank in ARTICLE 19's general approach. For future reporting, ARTICLE 19 is encouraged to demonstrate how they assist partners meet the same high standards of accountability. Are any commitments to accountability included in the selection process? It would also be interesting to review how the approach to work more closely with partners, including through regular project steering committee meetings, has influenced positive results?</p>
II. Financial Management	
NGO7	<p>Resource allocation <i>Fully addressed</i></p> <p>ARTICLE 19 shares detailed information on effective resource allocation, the tracking of resources and robust internal/external controls. In their last report, ARTICLE 19 showed which percentage of funding was used for which strategic goal. This year, they allocate funding to different geographic project areas.</p>
NGO8	<p>Sources of Funding <i>Fully addressed</i></p>
III. Environmental Management	
EN16	<p>Greenhouse gas emissions of operations <i>Fully addressed</i></p> <p>ARTICLE 19 provides comparable data for the three previous years. There is a large increase from 173 to 311 metric tonnes of total greenhouse gas emissions from 2013 to 2014. This is mostly due to business related travel and the organisation's desire to engage more stakeholders in their work (e.g. staff inclusion for 6-year strategy or inviting experts from the Disability and Freedom of Expression sectors to London), including an increase in staff numbers. These consultations have been complemented by online platforms and the Panel encourages ARTICLE 19 to invest more in online meetings in 2015.</p>
EN18	<p>Initiatives to reduce emissions of operations <i>Addressed</i></p> <p>ARTICLE 19 acknowledges the need to reduce staff travel, particularly flights. This is laid out in their environmental policy, which should be hyperlinked in the report. The Panel looks forward to the new environmental policy which will be completed in 2015. Does the organisation have a systematic approach to environmental management in place?</p>
EN26	<p>Initiatives to mitigate environmental impact of activities and services <i>Addressed</i></p> <p>Staff travel causes the majority of greenhouse gas emissions from ARTICLE 19, however, they do encourage many strategies to reduce this, including on-line consultations and rail travel, and further efforts are encouraged. The organisation's procurement procedures consider the environmental impact of their choice of</p>

	supplier. Are there other forms of conducting environmental assessments prior to carrying out activities? Finally, the Panel positively notes that ARTICLE 19 also empowers civil society to exercise their right to access environmental information.
IV. Human Resource Management	
LA1	<p><i>Size and composition of workforce</i> <i>Partially addressed</i></p> <p>The answer provides a breakdown of the workforce according to geographical region. Unfortunately, in 2014, the HR department introduced a new system that did not capture the disaggregated data on different contract (part- or full-time) and responsibility levels. The Panel urges ARTICLE 19 to provide this information again in their report for 2015.</p>
EC7	<p><i>Procedure for local hiring</i> <i>Fully addressed</i></p> <p>ARTICLE 19 can be commended for having recruited all staff, including senior management for the five regional offices, from the local community. Regional offices have developed their own local recruitment strategy. The Recruitment Policy was shared with the Panel.</p>
LA10	<p><i>Workforce training</i> <i>Addressed</i></p> <p>The Panel commends ARTICLE 19 for having increased their training budget by 20% in 2014. Feedback received, on e.g. a 10-week Diploma Course on Freedom of Expression for all staff, has already driven an update of the training. How much staff has participated in trainings in 2014 and what process is used to evaluate training programmes? How are overall training needs generally identified?</p>
LA12	<p><i>Global talent management</i> <i>Fully addressed</i></p> <p>A new Performance Management Policy (shared with the Panel) outlines how performance is measured on a regular basis throughout the year, culminating in an annual appraisal which includes the use of 360 degree feedback. All staff were subject to such appraisals in 2014. As a result, a number of staff members were promoted in the reporting period. This is overall a commendable approach.</p> <p>ARTICLE 19 does not currently have a Talent Acquisition Strategy but is encouraged to identify future HR needs well ahead.</p>
LA13	<p><i>Diversity of workforce and governance bodies</i> <i>Addressed</i></p> <p>While it is noted that ARTICLE 19 is a small organisation and cannot gather full data on staff, the Panel would like to motivate the organisation to think about which groups of people should be represented in their governance bodies and workforce to improve their legitimacy and effectiveness (e.g. age, disability or other). Especially because of the organisation's limited size, the Panel thinks it should not be too difficult to provide a gender breakdown of all staff at all levels. Are there improvement targets for the future?</p>
NGO9	<p><i>Mechanisms to raise grievances</i> <i>Addressed</i></p> <p>The answer describes a comprehensive grievance procedure for staff.</p>

	<p>Nevertheless, it would be appreciated to link directly to the document in the next report. Staff unions or staff satisfaction working groups have fed into policy development and resulted to higher buy-in.</p> <p>Whereas it can be found online, as requested in the previous feedback, ARTICLE 19 is encouraged to actively share / directly link their code of conduct policy in the next report. Moreover, the Panel would welcome evidence demonstrating how staff concerns raised were resolved satisfactorily.</p>
V. Responsible Management of Impacts on Society	
SO1	<p><i>Managing your impact on local communities</i> <i>Partially addressed</i></p> <p>Whereas ARTICLE 19 did not report on this indicator in the previous report, this year's answer provides an interesting case study from Senegal which showcases the impact of their activities (i.e. access to information) on the wider community.</p> <p>For future reporting, it would be useful to provide a description of how representative this case study is of the <i>general approach</i> used by ARTICLE 19 to assessing the impact of their activities. Moreover, ARTICLE 19 stated in their 2012 report that they were going to assess the impact of their work on local communities; information on progress is strongly encouraged for future reports. How does ARTICLE 19 assess the degree to which their work has made direct or indirect impact (i.e. changes in freedom of expression or enhanced access to information due to their activities)?</p>
SO3	<p><i>Anti-corruption practices</i> <i>Partially addressed</i></p> <p>The Panel appreciates that ARTICLE 19 plans to broaden their anti-corruption trainings although their set target (8% of staff in 2015) still seems very low and insufficient. Currently, only 1.6% of staff have received external trainings in this regard. Information on how these anti-corruption trainings have so far improved ARTICLE 19's resilience to fraud and bribery would be appreciated.</p> <p>The Panel would welcome a link to the revised fraud and bribery policy.</p>
SO4	<p><i>Actions taken in response of corruption incidents</i> <i>Fully addressed</i></p> <p>There has not been any reported incident of corruption in 2014; nevertheless, ARTICLE 19 shares general information from the draft anti-bribery policy on how such an incident would be reported and followed up upon in theory.</p>
VI. Ethical Fundraising	
PR6	<p><i>Ethical fundraising and marketing communications</i> <i>Addressed</i></p> <p>Although 99% of ARTICLE 19's funding is secured from statutory sources and private foundations rather than public marketing or promotional activities, the organisation is again encouraged to have policies in place ensuring that: Needs are adequately described, the dignity of affected people is protected, or funds are used in the designated way regardless of their source. The Panel looks forward to progress on the new fundraising strategy (2015-2020); does this also involve concrete elements for ethical fundraising?</p>

	<p>A cross reference in regard to the new Monitoring, Evaluation and Impact system (MEI) would be helpful in NGO3.</p>
--	--