

# Feedback from the Independent Review Panel

Review Round November 2015

16 December 2015

Dear José Faura,

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 Educo

Educo's fourth report is very good, thorough, and comprehensive. It demonstrates a great improvement in comparison to previous years and Panel feedback has been thoughtfully considered. The report's new format is easier to follow and to be assessed against the Charter Reporting Guidelines.

Educo's Executive Director José M. Faura provides a strong **institutional commitment** in his opening statement. They strive for a culture of continuous participatory improvement in respect to transparency and accountability across the various regions in which Educo operates. While their specific understanding of accountability is not clear in the report, they provide a definition on their [website](#): "To improve our impact and guarantee the responsible use of our resources, Educo listens to our stakeholders and ensures that their concerns are reflected in the decisions and activities we undertake." Charter membership and the Charter logo are also published on this website.

Several areas are seen as **Good Practice** examples for other NGOs: Setting up an Accountability and Internal Audit Division (2.9), working with a clear reporting timeline (3.5), the board's self-conducted performance reviews (4.10), effectively synchronising and coordinating efforts with other actors – in particular via the new [Partnership Policy and Guide](#) and partnership management cycle (NGO6), implementing a co-auditing system (NGO7), and providing evidence for effective internal feedback mechanisms (NGO9). Moreover, lots of narrative-based **evidence** and illustrative examples are provided in case study boxes throughout the report.

**Weaknesses** include the following: Missing figures and types of formal complaints received, how they were handled, whether these complaints have been resolved in a timely and satisfactorily manner, and a timeline to roll out the complaints policy to all offices (NGO2); low appraisal rates and missing evidence that the current mechanisms developing staff globally as a key pre-requisite of achieving their strategic objectives work well in practice (LA12); and missing information on feedback received from communities as well as clear exit strategies in place (SO1). This is the third consecutive year in which expenditures exceed income (by 15% in 2012, 30% in 2013, and 14% in 2014). How are these deficits being financed? Is the board concerned about overruns?

It is positively noted that Educo meaningfully reacted to last year's **Improvement Analysis** and aimed to progress in the identified areas. Above weaknesses will form the basis of this year's Improvement Analysis and will be the baseline for future interim reports. Overall, Educo is commended for a very high level of transparency and accountability to its key stakeholders. Due to this great 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 November 2015  
Cover Note on Accountability Report

Educo  
“Moving towards a culture of accountability”

Reporting period: Calendar year 2014

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	<p><b>Statement from the most senior decision-maker</b> <i>Fully addressed</i></p> <p>Educo is commended for an interesting and succinct statement from their Executive Director José M. Faura. The participatory process employed to create the new Strategic Plan guiding Educo’s work until 2018 is crucial to the future implementation of the new strategy. It is further commendable that this inclusive process focuses on a strong commitment to a culture of continuous improvement in respect to transparency and accountability across the various regions in which Educo operates. It is appreciated that there is a web link of the new Strategic Plan under 2.2, whereas it is suggested to redirect the reader to the document when it is first mentioned in the report. Becoming a member of the ChildFund Alliance is a wise strategic step towards creating a learning and unified peer network which greatly adds to the goal of increasing and improving the organisational impact.</p> <p>The three main future challenges listed in the statement are well noted – in particular working to ensure that a culture of accountability and transparency pervades all of Educo’s communicative activities. The Panel will be following how the organisation approaches and tackles those.</p>
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> <i>Fully addressed</i></p> <p>Please note that the numbering is incorrect from 2.5 and beyond since “Educo’s program countries” is not numbered as 2.5.</p>
2.8	<p><b>Scale of organisation</b> <i>Fully addressed</i></p> <p>A thorough response is given including an accurate account on the scale of the organisation. Educo is commended on the significant increase of its online presence. However, a minor clarification on the number of employees would have been practical – are all 934 staff fully employed, or are there interns or volunteers included in this number?</p> <p>The web link to the audited financial statements is very useful at this place;</p>

	<p>however, it leads to the landing page of Educo's website. While the statements can be found, a direct link to the financial statements would have been more useful here.</p> <p>Finally, in light of the power of language, it is positively noted that the Internal Control Department was replaced by the Accountability and Internal Audit Division.</p>
2.9	<p><b>Significant changes in the organisational structure</b> <i>Fully addressed</i></p> <p>Educo became a member of the ChildFund Alliance in November 2014. As requested in the previous feedback letter, some more background information explaining the consolidation merger with Educación sin Fronteras would have been useful. How does the governance requirements of CFA compare with the Charter? Is there overlap/duplication?</p> <p>The introduction of a well-structured Accountability and Internal Audit Division committed, on the one hand, to foster a culture of accountability, and on the other, to ensure compliance with policies, codes and the responsible use of resources is highly commendable and therewith considered a <b>Good Practice</b> for other organisations to follow.</p>
2.10	<p><b>Awards received</b> <i>Fully addressed</i></p> <p>The Educo is commended for having won numerous awards in 2014.</p>
<b>III. Report Parameters</b>	
3.1 – 3.4	<p><b>Reporting period / Date of most recent report / Reporting cycle / Contact person</b> <i>Fully addressed</i></p>
3.5	<p><b>Reporting process</b> <i>Fully addressed</i></p> <p>As also stated in last year's Panel's feedback, Educo has committed to a meaningful and elaborate process (including focus groups and monitoring with respect to previous reports) consolidating the report. The clear timeline for reporting is seen as <b>Good Practice</b> for other Charter Members. The newly introduced report format following the chronological order of the GRI indicators is much more accessible and user-friendly. Publishing the report in Spanish, English and French is also a highly commendable practice.</p>
3.6 – 3.7	<p><b>Report boundary / Material content limitations</b> <i>Fully addressed</i></p>
3.8	<p><b>Basis for reporting on national entities, joint ventures and subsidiaries</b> <i>Fully addressed</i></p> <p>The new system (including clear responsibilities and standard templates) which enables Educo to compile all relevant data from country offices, standardise this data, draw comparisons and exchange good practices is positively noted.</p>
3.10 / 3.11	<p><b>Significant changes from previous reporting</b> <i>Fully addressed</i></p> <p>As mentioned in 3.5, it is positively noted that Educo aimed at including more</p>

	<p>qualitative feedback in this report. The information was gathered in a systematised way through a general staff survey and focus groups, so that all programme countries are reflected in the report.</p>
3.12	<p><b>Reference table</b> n/a</p>
<p><b>IV. Mission, Values, Governance, and Stakeholder Engagement</b></p>	
4.1	<p><b>Governance structure</b> <i>Addressed</i></p> <p>Detailed information about Educo’s governance structure, its responsibilities, voting modalities, strategic and development objectives as well as its robust risk management (external and internal) is provided. A Delegate Committee was created in 2014 to streamline the Board’s decision-making process. The board conducts performance reviews of itself but the report says this is done twice “during its period of mandate, one at the halfway point and the other at the end”. Does this imply that all trustees rotate off at the same time? This would be a questionable practice in terms of continuity and balance of power between the board and management.</p> <p>How does this specific governance structure optimally support the achievement of Educo’s mission in practice? How is sound decision-making on the ground ensured?</p>
4.2	<p><b>Division of power between the governance body and management</b> <i>Fully addressed</i></p>
4.3.	<p><b>Independence of Board Directors</b> <i>Addressed</i></p> <p>The answer provides very succinct information on the number of the Board of Trustees, followed by a link redirecting to the website for more additional information on the Board. The information on the website seems helpful and is available in Spanish, English and French. It is furthermore not elaborated on the independence of individual Board Directors, e.g. how many are non-executive (e.g. Jose Faura is listed as Vice Chair of the Board as well as the Executive Director).</p>
4.4	<p><b>Feedback from internal stakeholders</b> <i>Addressed</i></p> <p>The response provides an overview on internal channels for the exchange of feedback across the organisation include periodic meetings between the Executive Director and the Board of Trustees and additional meetings in which the Board travels to meet staff in programme countries. More details about the intervals in which those meetings are being conducted (i.e. what is “periodic”?), as well as evidence on the direct communication channels between all internal stakeholders and the Board of Trustees or the Management will be appreciated in the next report.</p> <p>In 2014, Educo conducted a consultation with all staff, volunteers and a representative of the Board of Trustees to assess issues such as governance, accountability and human rights culture. This led to the identification of institutional strengths and weaknesses which will be addressed in an Action Plan to be implemented in 2016. The Panel would appreciate an overview of these</p>

	strengths and challenges in the next report. Will this consultation be established as a reoccurring practice?
4.5	<p><b>Compensation for members of highest governance body</b> Fully addressed</p> <p>Does Educo pay departure arrangements and are external income sources of senior management openly published? Educo is encouraged to look at ARTICLE 19 as an instructive example for benchmarking salaries in the sector.</p>
4.6	<p><b>Conflicts of interests</b> Fully addressed</p> <p>Educo has introduced solid policies on conflict of interest (e.g. <a href="#">Code of Good Governance</a> and <a href="#">Ethical Code</a>); it is, however, advisable for next report to include evidence revealing how these policies work efficiently in practice, in particular in terms of decision-making, fundraising, human resources etc. Is it possible to adapt these policies to country-specific needs?</p>
4.10	<p><b>Process to support highest governance body's own performance</b> Addressed</p> <p>In 2014, in the interest of ensuring rigor and transparency in the appointment of Board members, Educo formed a Nominations Committee, which is tasked to select potential candidates. Whereas this is a commendable practice, more information about the formation of the Nominations Committee would have been useful at this place; how is the Committee being selected? It is described as an internal committee which implies that it is a management body rather than a board one. This would normally be the duty of a Board sub-committee, potentially also drawing on external advisors or a recruitment consultant. Are the five-year terms renewable? How are conflicts of interest to be identified in this process?</p> <p>Moreover, the Panel regards the board's self-conducted performance reviews as <b>Good Practice</b> for other Charter Members and looks forward to first results of and consequences from the Board's self-evaluation in the next full report.</p>
4.12	<p><b>Social charters, principles or other initiatives to which the organisation subscribes</b> Fully addressed</p>
4.14 – 4.15	<p><b>List of stakeholders / Basis for identification of stakeholders</b> Fully addressed</p> <p>Educo provides a very comprehensive overview of their stakeholders as well as how these are identified, categorised, and prioritised.</p>
4.16 – 4.17	Moved to NGO1.

## PERFORMANCE INDICATORS

### I. Programme Effectiveness

NGO1	<p><b>Involvement of affected stakeholder groups</b> Fully addressed</p> <p>The response provides a comprehensive response indicating how the new <a href="#">Child Participation Standards</a> are embraced in practice. All of Educo's programmes and</p>
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	<p>projects should include a strategy for child participation throughout the project cycle, as well as a monitoring mechanism that has been validated through a participatory process that includes children. Is there evidence that this approach has reshaped decision-making?</p> <p>In relation to this, the 2015-2018 Strategic Planning Process is given as evidence to present how stakeholder engagement in this process has positively shaped the new Strategic Plan. This also includes a list of formats and frequencies applied. It is highly commendable that Educo produced a child-friendly version of the Strategic Plan in the form of a comic book to ensure that children's participation is meaningful and ongoing.</p> <p>The Panel looks forward to outcomes on the identification which channels and mechanisms are the most effective for receiving feedback from children and how this can be applied in practice.</p>
NGO2	<p><b><i>Mechanisms for feedback and complaints</i></b> <i>Partially addressed</i></p> <p>Educo's participation in the <a href="#">Interagency Study on Child-Friendly Feedback and Complaint Mechanisms within NGO programmes</a> is commendable. The Panel is furthermore looking forward to seeing the <a href="#">Complaints and Feedback Policy</a> implemented in all operating countries (currently only adopted in five country offices) and is interested in a timeline for this global roll-out.</p> <p>The response omits to elaborate on the number and types of formal complaints received (e.g. via the email address <a href="mailto:opina@educos.org">opina@educos.org</a>), how they were handled, and whether these complaints have been resolved in a timely and satisfactory manner. It is further important to know how well known complaints channels are among the organisation's stakeholders.</p> <p>Finally, it is understood that the Social Action Programme (SAR) functions independently as a social platform / project in its own rights used only in Spain. As asked in the previous feedback letter, it is essential to elucidate more about the practical functionality of this collaboration forum: how it is operated, by whom, is it open for use only to organisations participating in the SAR or also for external ones, and what examples can be provided to explain its functionality as an effective mechanism for exchanging feedback. How well known is the forum among Educo's stakeholders? Do they have direct access to it?</p>
NGO3	<p><b><i>Programme monitoring, evaluation and learning</i></b> <i>Addressed</i></p> <p>The Panel registers good progress in regard to Educo's global measurement of impact and the use and systematising of applied research to validate the effectiveness of projects and theories of change informing Educo's programmes (via the new Impact and Learning Unit and in line with the 2015-2018 Strategic Plan).</p> <p>The two examples (e.g. India on page 20) provide outline how projects are being evaluated and how this has helped improve effectiveness and planning for future projects. As indicated by the Panel in last year's report, however, an account on Educo's generic procedures in place would be appreciated. How is Educo's engagement generally effective? In this regard, a link to the new institutional policy would be appreciated in next year's report.</p>



	<p>The creation of the Policy and Strategy Division as a new division in the Head Office – whose mission is to foster a culture of learning and systematic evaluation and to promote the integration of a rights-based approach throughout the entire organisation – is positively noted.</p>
NGO4	<p><b><i>Gender and diversity</i></b> <i>Addressed</i></p> <p>The 2015-2018 Strategic Plan establishes a gender approach as a cross-cutting aspect in all interventions and Educo published a <a href="#">Guide to Gender Mainstreaming</a> in Spanish.</p> <p>In Educo’s 2013 report it was mentioned that the organisation was at the time working on developing a Non-Discrimination Policy for 2015 that will establish guidelines to ensure the systematic integration of a focus on gender and diversity at all levels of the project cycle. The present report indicates that Educo is currently in the process of formulating a Policy on Non-Discrimination, Diversity and Inclusion aiming at similar guidelines further extended to the ensuring of the systematic integration of an inclusive approach both within the organisation and throughout all phases of the project cycle. The Panel is looking forward to a clear work plan, the finalisation and implementation of this policy. Moreover, has Educo set any targets in regard to non-discrimination? This indicator is not only about numbers but more about the “why” for inclusion (see also the generic feedback letter in the beginning of this assessment).</p>
NGO5	<p><b><i>Advocacy positions and public awareness campaigns</i></b> <i>Partially addressed</i></p> <p>Educo admits that they still have to go a long way in the area of advocacy and are eager to learn from other NGOs. The newly created Campaigns and Advocacy Department and the development of an advocacy strategy and protocol for defining institutional positioning are already commendable steps towards meaningful progress.</p> <p>Similarly to last year’s report, the answer to this indicator omits to elucidate how Educo’s advocacy actions and interventions carried out in 2014 were inclusive for all stakeholders and how corrective adjustments are carried out. While Educo has just set up a new department and is relatively new in campaigning, these issues will become more important in the future.</p>
NGO6	<p><b><i>Coordination with other actors</i></b> <i>Fully addressed</i></p> <p>The answer given provides a clear overview of Educo’s attempts to effectively synchronise and coordinate efforts with other actors – in particular via the new <a href="#">Partnership Policy and Guide</a> and partnership management cycle. This is regarded as a <b>Good Practice</b> example for other organisations. Signed agreements could provide evidence. Further, a more detailed list of Educo’s key stakeholders and their roles in such processes would be useful in the next report. How does Educo ensure that partners also meet the same high standards of accountability?</p>
<b>II. Financial Management</b>	
NGO7	<b><i>Resource allocation</i></b>

	<p><i>Fully addressed</i></p> <p>The answer provides a very thorough overview of effective allocation, resource tracking and minimisation of risk of funds being misused. Educo is commended on the implementation of a co-auditing system in which two independent auditing firms are bond to reach a consensus on the accounts. As the only NGO in Spain implementing this practice, it is suggested by the Panel as <b>Good Practice</b> for other organisations to follow.</p>
NGO8	<p><b>Sources of Funding</b></p> <p><i>Fully addressed</i></p>
<b>III. Environmental Management</b>	
EN16	<p><b>Greenhouse gas emissions of operations</b></p> <p><i>Fully addressed</i></p> <p>Educo is commended for having gathered greenhouse gas emissions data for all programme countries as a first year. Emissions from work-related travel, commuting and paper consumption is, however, still limited to Spain. The Panel looks forward to the integration of all activities in the country offices for the next report and to progress from this baseline 2014 going forward.</p> <p>In light of actual overall achievements, the Panel suggests getting in touch with Greenpeace International and to learn from their newly implemented greenhouse gas emissions management tool – Cloudapps Sustainability. This enables their country offices to receive detailed reports on their current and historic emissions and to receive a benchmark of their Environmental Performance against other offices.</p>
EN18 & EN 26	<p><b>Initiatives to reduce emissions of operations / Initiatives to mitigate environmental impact of activities and services</b></p> <p><i>Addressed</i></p> <p>Educo lists interesting initiatives to reduce the environmental impact of their activities from country offices. The Panel looks forward to hearing more on the Environmental Policy which was approved in 2015. Does this entail an environmental management system guided by senior leadership? Has Educo set any concrete reduction targets?</p>
<b>IV. Human Resource Management</b>	
LA1	<p><b>Size and composition of workforce</b></p> <p><i>Fully addressed</i></p> <p>Educo shares relevant information about its workforce in a very clear and comprehensive table.</p>
EC7	<p><b>Procedure for local hiring</b></p> <p><i>Fully addressed</i></p> <p>Educo is commended for reducing the hiring of expatriate staff in programme countries – less than 0,05% of country staff are expatriate. A link to the Foundation’s Expatriate Policy would nevertheless be helpful. As requested in last year’s report, it would be essential to know how Educo ensures not to undermine the local public sector by its hiring practices and how they actively build local capacities.</p>
LA10	<p><b>Workforce training</b></p>

	<p><i>Addressed</i></p> <p>The answer given is thorough, including the total hours of training per employee in all programme countries and the percentage of the overall budget allocated to staff training. The answer would have profited from an overview how Educo identifies most immediate training needs? Is feedback collected at the end of each course? Which is the process in place to check trainings' effectiveness?</p>
LA12	<p><b><i>Global talent management</i></b> <i>Partially addressed</i></p> <p>While appraisals are systematised and figures increased in comparison to the previous year, only 42% of all staff underwent a formal review process in 2014. The Panel encourages Educo to improve in this regard. What is Educo's commitment / target in this regard?</p> <p>It would be interesting to know how the Performance Review and Development Manual ensures human resources' capacities are developed to support the global restructuring process and attainment of strategic goals. As requested in last year's Panel's feedback, Educo is encouraged to provide evidence that the current mechanisms developing staff globally as a key pre-requisite of achieving their strategic objectives (i.e. staff performance appraisals) work well in practice.</p> <p>Finally, in line with Educo's endeavour to push accountability towards children, it is suggested that appraisals include a human-rights based approach, e.g.: To what extent has the organisation integrated participation, empowerment and inclusion in their work? Can Educo give examples?</p>
LA13	<p><b><i>Diversity of workforce and governance bodies</i></b> <i>Fully addressed</i></p> <p>The answer provides relevant details regarding current staff distribution by country, age and gender. In coming years, Educo will implement a tool for country-based monitoring that incorporates all of the criteria Educo has set for equity and diversity, including indicators for disability. The Panel will follow up on this.</p> <p>It is positively noted that the gender balance at the management level in Spain became equal in 2014 and that another woman joined the Board of Trustees of which, however, 75% are still men.</p>
NGO9	<p><b><i>Mechanisms to raise grievances</i></b> <i>Fully addressed</i></p> <p>Educo is working on a new security policy to establish guidelines for the protection of staff and assets in the programme countries since 2014. Upon this framework a Protection Manual and Protection Plans for all programme countries will be formulated. The Panel will follow the development of this process and would like to share these with other Charter Members once they will be adopted.</p> <p>The organisation presents good evidence that the complaints and feedback accumulated through the feedback and grievances channels (also encouraged by the "Educo thinks" campaign) have led to positive changes in the Federation. It would be interesting to learn more details about the "Educo thinks" campaign but the evidence overall serves as a <b>Good Practice</b> example to other organisations. The Panel looks also forward to results from the survey to evaluate various attributes, values and dimensions of Educo's organisational culture in 2015.</p>

<b>V. Responsible Management of Impacts on Society</b>	
SO1	<p><b><i>Managing your impact on local communities</i></b> <i>Partially addressed</i></p> <p>As indicated in last year's Panel's feedback, Educo's effective management of entering, operating and exiting campaigns is well noted and their approach to change is comprehensively displayed. However, is there any evidence that this has led to improved management response? What kind of feedback has Educo received from communities? Are there clear exit strategies or post-intervention evaluations in place?</p> <p>Looking at Educo's Theory of Change, there is a gap between duty-bearers and rights-holders. What can be learnt from this? Finally, the Panel looks forward to outcomes of demonstration of programmes' social values via the Social Action Program.</p>
SO3	<p><b><i>Anti-corruption practices</i></b> <i>Addressed</i></p> <p>Educo states that despite the absence of a specific anti-corruption policy, they do have mechanisms for identifying possible cases and for avoiding them (e.g. their Ethical Code or the Internal Audit Department). Is there evidence that these procedures and zero-tolerance level are well known among staff? How does Educo carry out systematic risk analysis on where their work could be exposed to corruption, bribery or fraud? Overall, the Panel supports the creation on an anti-corruption policy. The Charter Secretariat will be happy to connect Educo with other Charter Members who have presented <a href="#">Good Practice</a> examples in this regard.</p>
SO4	<p><b><i>Actions taken in response to corruption incidents</i></b> <i>Fully addressed</i></p> <p>There were no cases of corruption reported in 2014. Nevertheless, it would be interesting to know how Educo would record or publish an incident <i>if</i> one occurred.</p>
<b>VI. Ethical Fundraising</b>	
PR6	<p><b><i>Ethical fundraising and marketing communications</i></b> <i>Fully addressed</i></p> <p>The basic principles that regulate Educo's fundraising activities are set forth in their <a href="#">Ethical Code</a>, <a href="#">Code of Conduct for Working with Children</a> and <a href="#">Policy for Collaborating with Businesses</a> (published in January 2015, currently available in Spanish). A policy on donations will be drafted in 2015-2016. Externally, Educo is a member of fundraising associations and complies with national regulations; donations above 1,000 Euros are published.</p> <p>Educo received five complaints related to fundraising in 2014 which were all adequately responded to and resolved as outlined in their Complaints and Feedback Policy.</p>