Feedback from the Independent Review Panel
Review Round April 2014

Berlin, 11 June 2014

Dear José María Vera Villacian,

Thank you for submitting your accountability report to the Charter's Independent Review Panel for assessment. As in previous years we found that the quality of reports is generally improving, demonstrating greater institutional commitment and more evidence that mechanisms are working in practice. Before providing individual feedback on your organisation's report, allow us however to highlight three areas of general concern:

1.) *Accountability is a pro-active tool to develop and deliver on key value propositions of an organisation (3.5)*

Accountability is all too often perceived as a defensive tool, when it is really a mechanism to pro-actively define what an organisation wants to be held accountable for i.e. delineating key parameter of its identity and drive organisational development accordingly. The profile disclosure 3.5 looks like a rather technical question on how the report is compiled; but it covers a lot more by asking: how do you use the report as an opportunity for a cross functional systematic and critical reflection on how accountability is best implemented and underpins the legitimacy and quality of your organisation's work. Please describe under 3.5 how you use the reporting process to embed accountability into your organisation. Against this background Members are also strongly encouraged to place the Charter logo prominently on their website and to further link to the Charter website, so that stakeholders know what to hold you accountable against.

2.) *Complaints Handling Mechanisms (NGO2)*

Having a fully functioning complaints handling mechanism in place is the only Minimum Standard for Charter Members so far. The Panel is very concerned about rather slow progress by many Charter Members to comply with this. We have therefore decided to ask the Charter Board to look into implementing a timeline policy for compliance. In our view the leeway should be no longer than two to maximum three years after a Minimum Standard has been adopted. You find examples of well-functioning complaints handling mechanisms in the Good Practice document on the Charter website, capturing good examples from this and previous reporting rounds.

3.) *Succinctness and communication quality*

There is a danger that accountability standards develop a life of their own and become increasingly complex and detached. We have noted that Charter reports tend to get longer without necessarily providing more relevant information. It is important however to use these reports to actively communicate internally and externally how accountability is an integral part of your organisation and strengthens the quality of your work. In order for these reports to be read, we suggest that they should have a maximum of 40 pages. For each GRI indicator it is sufficient to report three things:

a) Do you have policies and processes in place to address the issue?
b) Do you have evidence that it is embedded in systematic practice?
c) Is there evidence to show that this has led to improved quality of work?

Sometimes the Panel asks for more information. We are aware of this and try to limit it. But with all questions we encourage you strongly to be as succinct as possible, and take the above three parameters as guidance. Also try to avoid repetition and where illustrations are given, please keep these brief. Plain language and a minimum of acronyms are also welcome. Organisations who wish to merge their accountability report with the annual report are encouraged to additionally provide a separate and more reflective addendum relating to the Charter if the annual reports do not embrace that due to a desire to be more promotional.

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Organisation-specific feedback to Oxfam Intermón:

Oxfam Intermon's fourth report has improved from previous years; it is good, overall complete and comprehensive. **Institutional commitment** *to accountability and to the work of the Charter is acknowledged. The integration of the accountability report in the annual report contributes to raising awareness about commitments made though Charter membership and how Oxfam delivered against them. However, since the integrated format of the report does not allow for the organisation to be self-critical, the Panel suggests that an additional chapter is added to the report as submitted to the Panel, which focuses exclusively on matters that need to progress further. This could be amended when Oxfam switches towards publishing one overall report for all Oxfam affiliates. Placing the Charter logo next to the table of contents and shortly explaining the Charter's mission, as well as inserting the relevant GRI indicators into the report's text, which are then displayed and clarified in the annex, is highly appreciated. Oxfam Intermon is further encouraged to put the Charter logo on its* website *on transparency and accountability.*

The report comprises a strong opening statement by the Executive Director, underlining Oxfam Intermon's commitment to transparency and accountability. It also includes a thorough account of the organisational governance structure afterwards. Throughout the report many examples of highly positive impact are given and it would be interesting to know how exactly this impact is being assessed, through which mechanisms precisely, and how feedback given by stakeholders informs future steps. 4.15 can be seen as a **Good Practice** *example. Oxfam Intermon is encouraged to give more information on its general policies (and not only in relation to specific cases) together with* **evidence** *of the effective implementation of these.*

In relation to the management of its environmental impacts, the organisation has made good progress in the financial year 2012/2013 and it is commended for its efforts in this regard. In terms of inclusion, Oxfam Intermon has greatly focused on women's rights, as well as on other vulnerable groups, marginalised because of age or ethnicity; for next year's report it would be essential to present the organisation's norms/standards or tools for the analysis of these groups.

In several cases the Panel's earlier remarks have not been followed by discernible action and are therefore repeated in this note (see 4.4, NGO2, NGO4, LA12, LA13, SO3, PR6). Also, Oxfam Intermon did not include the **GAP Analysis Table** *as required in the new reporting guide. This table is meant to give a very brief overview on previous commitments an organisation has declared and their realisaton in the coming years including any progress that has been achieved so far. Oxfam Intermon is kindly asked to complete it when preparing the next report. Finally, for its the next report, the organisation is asked to include the new indicators which are mandatory for every report covering 2013 and onwards (e.g. NGO9 would already be applicable for this report).*

Our intention is that this letter, and any response you may wish to provide, is made publicly available on the Charter website, along with your report. You can find the reports that were previously reviewed on the Charter website. However, should there be errors of fact in the feedback above or in the note below we would of course wish to correct these before publication. Please share these comments or corrections by 10 July 2014.

If you have any other feedback or comments on our work, please share with us by sending them to the Charter Secretariat. We would very much like to hear your views.

Yours sincerely,

Richard Manning · Louise James · Wambui Kimathi · Michael Röskau · Janet Kiragu · Rhonda Chapman

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Review Round April 2014
Cover Note on Accountability Report

Oxfam Intermón

Reporting period: Financial year 2012/2013

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	***Statement from the most senior decision-maker*** *Fully addressed* The statement given by the Executive Director is thorough and comprehensive; it gives a very good overview of Oxfam Intermon's main priorities and puts strong emphasis on its commitment to transparency and accountability. However, the statement could have been more specific when describing Oxfam Intermon's vision and future steps and how accountability leads senior management's efforts to constantly drive organisational development.
II. Organisational Profile	
2.1 – 2.7	***Name of organisation and primary activities / Operational structure Headquarter location / Nature of ownership / People served*** *Fully addressed*
2.8	***Scale of organisation*** *Fully addressed* It would have been helpful if the information on this indicator was not spread out on 13 different pages but had been presented more concise. The budget information is amply presented and commended (p.41).
2.9 – 2.10	***Significant changes to previous reporting / Awards received*** *Fully addressed*
III. Report Parameters	
3.1 – 3.3	***Reporting period / Date of most recent report / Reporting cycle*** *Fully addressed*
3.4	***Contact person*** *Partially addressed* The organisation is encouraged to state a specific person in the next report instead of a general email address.
3.5	***Reporting process*** *Partially addressed* This indicator asks who is involved in which way to determine the report parameters and how information is collated and edited; and who has the final responsibility. Oxfam Intermon is encouraged to use this report to involve people across all functions and to sharpen its focus on accountability as a key driver to continuous organisational development.

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3.6 – 3.7	**Report boundary / Specific limitations** *Fully addressed*
3.8	**Basis for reporting** *Fully addressed* Covered under indicator 2.9.
3.10 – 3.12	**Reporting parameters** *Fully addressed*

	IV. Mission, Values, Governance, and Stakeholder Engagement
4.1	**Governance structure** *Fully addressed* Further information on how this specific governance structure supports the achievement of Oxfam Intermon's mission is welcome in the next report.
4.2 – 4.3	**Division of power between the governance body and management / Independence of Board Members** *Fully addressed*
4.4	**Feedback from internal stakeholders** *Partially addressed* As in the two previous reports, the information provided is on the mechanism for feedback to the Management team but not to the highest governing body, the Board of Trustees. The Panel looks forward to the reviewed communication and relationship channels of the organisation and evidence of meaningful stakeholder engagement. Oxfam Intermon does not share any concrete developments concerning the establishment of the permanent position of the Ombudsman.
4.14	**List of stakeholders** *Fully addressed* The list of stakeholders is rather generic and would benefit from some concrete examples.
4.15	**Basis for identification of stakeholders** *Fully addressed* Oxfam Intermon can be commended for a thorough process for selecting stakeholders which is based on six principles: shared vision and values, complementarity of purpose, autonomy/independence, transparency/accountability, clarity of responsibilities, and commitment to shared learning. This can be seen as **Good Practice**. Additionally, the organisation links to specific criteria which guide its relationship with the business sector.

PERFORMANCE INDICATORS
I.   Programme Effectiveness
NGO1	**Involvement of affected stakeholder groups** *Partially addressed* The report identifies affected stakeholder groups and gives a thorough account of

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	the implementation, monitoring and evaluation of various programmes. However, it omits to specify how decisions are communicated to stakeholders and how feedback has reshaped policies/procedures.
NGO2	**Mechanisms for feedback and complaints** *Partially addressed* As in the previous report, information on how some beneficiaries can give feedback and complaints is indicated, but no information on a general written complaints mechanism is given. Furthermore, no information on the number and types of complaints received, the assessment of complaints, or what is undertaken in response to them is available. The intention from previous reports to create a position of "Ombudsman" is mentioned very shortly in relation to training employees in Colombia (p.20). However, no precise information is given in regard to implementing the role of the Ombudsman in general, to act as the organisation's independent tool for the regulation of feedbacks and complaints.
NGO3	**Programme monitoring, evaluation and learning** *Partially addressed* The report contains information on educational initiatives and the organisation's system for regional monitoring, evaluation and learning in the six countries where it has intervened in the context of the Sahel emergency. However, as in previous reports, it does not include information on general ME+L systems in place, how these are linked to strategic objectives, and how adjustments and shared learning are communicated to stakeholders.
NGO4	**Gender and diversity** *Partially addressed* The report addresses various instances where measures to integrate gender and diversity are undertaken with a predominant focus on women's rights. However, as in previous reports, there is no information on the organisation's policies related to diversity, norms/standards or tools for analysis. Oxfam Intermon is highly encouraged to close this gap for the next report.
NGO5	**Advocacy positions and public awareness campaigns** *Partially addressed* An interesting and thorough overview of the organisation's implementation of advocacy and public awareness campaigns is given; however, it is not mentioned specifically how consistency is maintained during these processes, and neither any corrective actions nor adjustments of advocacy positions and public awareness campaigns are indicated.
NGO6	**Coordination with other actors** *Partially addressed* As in the previous report, various instances of cooperation and coordination are given, but it is not indicated how the organisation systematically tries to reduce duplication of efforts or how it identifies opportunities for partnership. Oxfam Intermon is encouraged to provide evidence that its coordination with partners has led to positive management response.
II. Financial Management	
NGO7	**Resource allocation** *Fully addressed*

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NGO8	**Sources of Funding** *Fully addressed*

III. Environmental Management	
EN16	**Greenhouse gas emissions of operations** *Partially addressed* Oxfam Intermon can be commended for reducing its CO_2 footprint from 2011-12 to 2012-13. However, the report has omitted to provide more detailed information on total direct and indirect green-housed gas emissions. The organisation is encouraged to develop an effective Environmental Management System (EMS) that is guided by senior management commitment and regular assessments.
EN18	**Initiatives to reduce emissions of operations** *Fully addressed* The report includes information on the various initiatives committed to reducing emissions (such as decreasing airplane travels) and their direct positive results. It is stated that the organisation will continue promoting good practice regarding those initiatives which is very commendable. However, it is also recommendable that a reduction plan with clear goals and more concrete future steps is presented.
EN26	**Initiatives to mitigate environmental impact of activities and services** *Partially addressed* This new mandatory indicator is partly covered by the information provided under EN18.

IV. Human Resource Management	
LA1	**Size and composition of workforce** *Fully addressed* The organisation provides relevant information on the overall workforce size and different contract types and regions of staff members. Whereas it is stated that 77% of all volunteers are female (p.38), the overall number of volunteers is missing.
EC7	**Procedure for local hiring** *Fully addressed*
LA10	**Workforce training** *Partially addressed* Oxfam Intermon regards training as a strategic tool to drive the development of the organisation and its staff. However, only 311 out of overall 1.134 staff members (27.4%) received training in 2012-2013. Information on how Oxfam Intermon identifies the most important training needs and how training is spread across the different workforce categories is welcome in the next report.
LA12	**Global talent management** *Partially addressed* The report indicates that every two years all staff carries out an evaluation of their performance, highlighting the training needs of each person, with reviews every six months with their direct manager. However, information if really "all" staff members were evaluated in the reporting period is, as in previous reports, not mentioned.

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LA13	**_Diversity of workforce and governance bodies_** _Partially addressed_ The organisation provides information about age and gender groups in relation to the composition of governance and workforce bodies, but, as in its last report, it omits information on minority groups or other diversity indicators. Although the organisation set a gender equality plan in 2011 to be finalised in 2015, there is still a gender imbalance on the Board of Trustees (only 15,3% women), as noted two years ago. In contrast to last year, the number of employees per employee category is now indicated.

V. Responsible Management of Impacts on Society

SO1	**_Managing your impact on local communities_** _Partially addressed_ The report contains very thorough information on how the programmes have been effective in maximising the positive impacts, and some information on how these impacts on entering communities have been assessed. However, no specific clarifications are given on any policies in place or on how actually impact is being assessed, through which mechanisms, and how feedback informed future steps. In general, the report would be stronger for clearer statements of policies in place and in particular on how impact is measured.
SO3	**_Anti-corruption practices_** _Partially addressed_ Although in its last report the organisation has made a commitment to organise periodic training on its Policy against Corruption and Fraud in the next year, this report does not include any information on anti-corruption measures or training, other than carrying out internal audits in some country offices.

VI. Ethical Fundraising

PR6	**_Ethical fundraising and marketing communications_** _Partially addressed_ As in the previous report, a large number of laws, standards and codes followed by the organisation are listed (p.10), but no information is included on how these procedures ensure e.g. fundraising materials adequately describe the organisation's work and needs, how donations are used to further the organisation's mission or how often compliance is reviewed. Oxfam Intermon has not received any complaints with regard to breaches of standards.

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Gap Analysis Table – Areas of Commitments and Progress achieved

Accountability is a process of continuous improvement. Each year Charter Members in their accountability reports identify and prioritise areas for improvement and corrective actions they plan to take. As of reports submitted in 2014, Members are asked to capture these commitments in this Gap Analysis Table. The Independent Review Panel may suggest the Member to add further issues when reviewing the Member's report. Each year following, the table shall be submitted along with the accountability report and will then be used as a basis to demonstrate progress. The table will be published on the website along with the accountability report and the feedback from the Panel. Please note that the rows where commitments cannot be identified can be deleted from the table.

GRI – Performance Indicators	Reporting year 2010/2011	Reporting year 2011/2012	Reporting year 2012/2013	Reporting year 2013/2014
Programme Effectiveness				
NGO2: Mechanisms for feedback and complaints.	*"The existence of [the ombudsman] has not yet been communicated to our main stakeholders and has not been launched (…). The aim is for the launch to take place in May/June 2012." [...]*	*"The creation of an Ombudsman was approved in March 2011, a neutral figure that defends the rights of our main interest groups and manages conflicts that cannot be managed through the usual procedures. However, we are still establishing its position."*	Colombia, p. 20: "(…) we are training employees of the Ombudsman with a view to extending this training to other government bodies."	
NGO3: System for program monitoring, evaluation and learning.	*"(...) the MEL system must help us position ourselves as agents who learn and are efficient."*	No progress reported.	No progress achieved.	
NGO4: Measures to integrate gender and diversity into program.	*"We must know which factors influence gender relations and identify which gender relations are established in a given context. […] We must take into account the specific opportunities that an intervention is going to generate for women and how women organise*	No progress reported.	*"(...) in Chad instrument have been developed to ensure the effective participation of women in our actions. However, we still have to make improvements in certain areas, such as how to obtain a breakdown of figures by gender and how to simplify the many accountability systems so*	

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	themselves in their spaces […].”		*that we can learn from them.”*	
NGO5: Advocacy.	*“We are in the process of revising the [campaign's manual] and adapting it to our campaigns in Southern countries.”*	No progress reported.	No progress reported.	
Economic				
NGO7: Resource allocation.		*“(...) we have since 2011 established a reserves policy (both book and cash reserves) that establishes a framework for action, together with indicators and limits which should ensure the balance, solvency and viability of the asset and financial structure, and the treasury structure and liquid assets.”*	No progress reported.	
Environmental				
EN18: Initiatives to reduce greenhouse gas emissions and reductions achieved.	*“After having calculated our greenhouse gas emissions from April 2009 to March 2010, in Intermon Oxfam we defined a three years Environmental Action Plan which would enable us to reduce 3% of our emissions during the fiscal year 2010-2011, 5% during the 2011-12 and 15% during the 2012-13.*	*“We calculated our carbon footprint in the 2010-11 fiscal year and in 11-12 we are working to reduce it, although we won't know if we have reached that goal until the following year.”* *“Conscious of the fact that about 95% of our emissions are due to the trips we make to the field, we are trying to reduce their number and impact, although a high percentage of them are essential to fulfill our mission.“*	*“We continue with the efforts that we implemented in the previous year of promoting good practice in our team regarding electricity consumption, air conditioning, use of paper, switching off computers and monitors, and waste management.”*	
Labor				
-				
Responsible Management of Impacts on Society				
SO1: Nature, scope, and effectiveness of any programs	**In report covering 2010/2011**; **IO's comments on IRP Feedback:** Intermón Oxfam is in a continuous process to strengthen programme's capacities for fully implement the	No progress reported.	No progress reported.	

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	MEL systems and design logical models. Nevertheless, at present we can say that up to 60 programs (50%) and up to 200 projects managed by one partner (75%) may be applying this.			
SO3: Percentage of employees trained in organization's anti-corruption policies and procedures.		*"During the 2011-12 fiscal year, we created a Policy against Corruption and Fraud in order to raise awareness within our team and also in our local partners. Via periodic training, in the next fiscal year, guidelines will be provided in order to avoid possible cases and to facilitate their detection, investigation and response."*	No progress reported.	
Ethical Fundraising				
PR6: Programs for adherence to laws, standards, and voluntary codes related to ethical fundraising	**In report covering 2010/2011**; **IO's comments on IRP Feedback:** *"Nowadays we cannot give the concrete number of complaints received for the breaches of standards because we have recently changed our customer relationship management system. Anyway, we can affirm the amount is not relevant."*	No progress reported.	*"For the fiscal year 2012-13, we have not received any complaints with regard to breaches of standards."*	

Further commitments for the future:
- **4.4** "as part of ethical framework, we are in the process of reviewing our communication and relationship channels which could become more adapted to the possibilities and requirements of the different groups we have relationships with."

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