

Johannesburg, 28th April 2011

Dear INGO Accountability Charter,

In response to the useful and important feedback by the independent panel, we would like thank you and provide our response to the comments on ActionAid International's 2009 GRI Annual Report. We appreciate the amount of work put into this process and the inputs will be used constructively in our organisation when reporting on 2010 and when developing our new monitoring system in 2011-12. Given it is the first time for all to use this format, we thought it useful to give some feedback of our experience in general as well as respond to specific comments.

Areas of gaps Our report was produced on the basis of our organisation's annual reporting process which normally takes place between February and May of each year. By the time the GRI format was available, we had already completed the reporting process, and so had to rely on what we had compiled for our own report. Being the first time to use the format, it was a challenge to use all of the suggested indicators, as this would require us to start documenting on issues which are not formally part of our monitoring system. We welcome the addition of new indicators in our own system related to carbon accounting and diversity. We also liked the option of being able to choose the most relevant indicators, and suggest that this continues.

Standards vs format We are pleased to note that you have included some of our answers as "good practice" answers. However, we also note that one answer highlighted as a good practice answer also received comments on incompleteness (e.g. part 1.1). We believe this is linked to the issue of what we put in the actual format. Where information was already available in our AAI Annual Report 2009 or in published policies, we did refer to these. We do not think it adds value to our accountability having to transfer information already collected and available in other places into the INGO format which is likely to only be read by the INGO panel, as the format is not so public friendly. Of course, we appreciate the panel did not have time to delve into multiple documents, but we question whether it increases accountability to reproduce the same information in parallel reports.

Compliance and comparability We feel it is important to consider compliance against the charter, rather than against specific indicators, as the sector is too diverse for standard indicators, and there are not always commonly agreed metrics. For example, on carbon monitoring indicators, there are not standards for how to measure emissions, which would be needed if data was to be compared across organisations. Our opinion is that compliance would have to be against practice, not a report, for there to be value.

We wonder if future reviews could consider less on the quality of the report, and more on the degree to which the standards are being met in the organisation. This could be achieved, for example, through peer reviews including interviews on a period basis. We would suggest a peer review every three years to validate, putting more of the volunteer time into that than into reviewing reports.

Number of Indicators We largely followed the NGO Reporting Template, with the exception of four indicators. The indicators chosen to report on are ones for which we had information readily available for 2009, for reasons mentioned above. We welcomed the options given at reporting stage, but felt that the feedback from the panel suggested it was a weakness to not report on more. We do not feel there needs to be a universal standard for comparability. We have a monitoring principle of only asking our members for information we will use for decision making, and not having excessive indicators to report on. We need to

be clear on why each indicator is important to us as an organisation. We do not consider “more to be better” in this case.

Comments We very much appreciate the time the independent review panel took to assess our report. In many instances however it simply indicates *missing information*. It would have been useful to know more about what information is considered to be missing in the areas where this is highlighted. The following is a brief response to comments by the panel:

1.1 We are not sure what information is considered missing – as this section was highlighted as a “good practice answer”. We feel the section is complete.

2.3 We agree with the comment. We will improve in the next report.

2.8 On scope/scale: We agree that we should provide more information in regards to number of child sponsors as well as numbers of people we reach. This metric is not properly reported on in all our programmes globally, so information is very weak at the moment. This is, however, an area which we are working to improve in the new monitoring system being developed in 2011-2012.

3.5 We agree on the comment – we did not go into depth as to how we defined the report. As we were reporting very late, for reasons mentioned above, we decided to use existing documentation for compiling the GRI report. We chose the indicators to report on by analyzing existing information. Going through the many GRI report indicators assisted us in clarifying what information is not being collected – and following this we discussed whether we are interested in collecting it - based on whether the information is relevant and of use to ourselves and our stakeholders.

4.4 We agree that we can elaborate on our mechanisms for our members to provide recommendations to the highest governing body.

4.15 We do not agree that information is missing. We have supplied links to our monitoring and evaluation system (Accountability, Learning and Planning System, ALPS) and our process of pre-appraisal and appraisal as well as our partnership policy. We do not find it useful to summarise these two documents in this report, so we only refer the reader to these documents.

Indicators

NGO4: We agree with the comment on including other diversity types. We presently only include gender as the main disaggregation in our documentation. We will work towards including other types of classifications in the new monitoring system, being developed in 2011-2012, we are working towards counting numbers and types of people we reach (disaggregated to various social groups and other classifications). In fact, we often count other types of people we work with, e.g. marginalized groups or social groups such as the Dalits in Nepal and India. We acknowledge that this was not fully reported on in the GRI 2009 report.

EN1 – EN 28: For all seven environmental indicators reported on, we stated that the information being reported is only for the UK office, as there was no system in place to collect data for other offices. We have only reported on paper use in EN1 and EN2 as these are the only two areas of relevance for our organization. We shall state this in the next GRI report.

We would like to highlight that the environmental indicators in the GRI report are assisting us, to some extent, in defining areas of monitoring in our organisation. We have set up an environmental monitoring task force to guide this process and 8 offices are establishing carbon emission data for 2010. This is proving more challenging than expected, in relation to agreeing on global standards for the purpose of comparability.

LA1, LA10, LA12: Currently, the type of information being collected is not so detailed. The organisation is working on ways to improve this and whether/what the information might be used for. LA12: the percentage is based on the figures as stated in LA1.

SO1: We find that some more detail is needed as to what is missing in our report. We apply our policies to all of our programmes – at local, national and international level. All programmes must adhere to the principles of our monitoring system, ALPS (Accountability, Learning and Planning System). Each programme, according to ALPS, undergoes an appraisal period, a partnership policy guides programmes from appraisal to partnership and ALPS sets the standards for when to monitor, review and evaluate and how to document these processes – all in relation to how effective our programmes have been. Programmes may be altered and adjusted in order to reach better results, as per findings of the review or evaluation. In the next report, we will consider to include examples of changes in programmes as a result of a review/evaluation and how communities are engaged in these processes.

We thank you again for your comments, which we shall use constructively in our next report for 2010. We hope this feedback is useful to you as well.

Yours sincerely,

Joanna Kerr
CEO, ActionAid International