Educo
Independent Review Panel Feedback
Accountability Report 2018
Review Round September 2019
Dear José M. Faura,

Thank you for submitting your accountability report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to strengthen accountability to communities, local partners, supporters, staff, donors, or other key constituencies. Our key focus is on accountability to those you serve. It is against this background that we critically discussed your report and came to the individual assessment below.

Educo’s eighth accountability report is again detailed, easy to read (though rather long), and reflects a strong approach and institutional commitment to dynamic accountability. There is a strong focus on participatory and collaborative ways of working as well as learning and improvement. The Panel commends Educo and appreciates its continued dedication to accountability.

Most policies and other relevant documents are linked and examples are provided to show how these work in practice at both global and country office level.

Key strengths in this report include the easy to follow layout, information on stakeholder identification (D1), a participatory approach to advocacy (F2), and complaints and feedback mechanisms (J3/J4). Educo’s approach to stakeholder engagement (E2) and resource acquisition (I1) are considered good practice.

There are no major areas for improvement. The Panel therefore suggests that the areas to focus on in Educo’s next interim report be discussed in the follow-up call. More information could be provided on challenges faced in the reporting period (A3), capacity strengthening of project participants (E4) and qualities/targets considered when recruiting new board members (J1).

We look forward to discussing our feedback with you in a follow-up call, which the Secretariat will be in touch to schedule. This conversation will form the basis for your response letter, which will be made publicly available on the Accountable Now website along with your report and this feedback letter.

If you have any other feedback or comments on our work, please share them with us by sending them to the Accountable Now Secretariat.

Yours sincerely,

Accountable Now’s Independent Review Panel
Educo’s Accountability Report 2018
Review Round September 2019

Opening Statement from the Head of Organisation

Educo’s report opens with a strong statement from Executive Director José M. Faura, explaining the importance of accountability to the organisation and highlighting key developments, successes and challenges. An institutional commitment to dynamic accountability is evident, with efforts to strengthen stakeholder engagement, and a focus on learning and improvement.

Educo is currently evaluating their last Strategic Plan, which ended in 2018, and developing a new one. The evaluation will allow Educo to identify successes, learnings, and areas for improvement, and communicate these to stakeholders. The Panel is pleased to note that accountability is flagged as a central axis for the new strategic framework, as it will allow Educo to respond to the needs of the people they are working with, and have a sustainable impact on their lives.

The statement shares several key developments relating to accountability, including efforts to coordinate standards and policies in country offices, better involve all offices in strategic decision-making, and pilot projects which are expected to help strengthen and promote accountability mechanisms throughout the organisation.

Updates are provided on areas the Panel had identified for improvement in Educo’s last accountability report; the Panel is pleased to read about this progress.

Cluster A: Impact Achieved

A. The impact we achieve

A1 Mission statement and theory of change

Educo’s mission and key approaches/values are explained. The report explains how the Theory of Social Change was constructed, and the Panel notes positively that the process was participatory, transparent, and cooperative.

It is also positive to see that several innovative initiatives have been set up at global level in order to test ideas around operationalising the Theory of Change, learning and improving. The results of the working groups set up to implement the Theory of Change will feed into the development of Educo’s next strategic framework, which is being developed in 2019.

A2 Key strategic indicators for success

4
Educo’s Institutional Strategic Plan was created in a participatory process with input from over 1500 stakeholders including children, partners and staff.

There are three strategic development objectives and three institutional strategic objectives. Each objective is accompanied by goals, key indicators, and strategic guidelines. An example is provided, of the strategic objective on education, and all objectives, indicators and goals are available in the strategic plan. Strategic objectives and annual targets in line with the Strategic Plan’s goals were also set up in each of the countries Educo works in, adapted to the local context.

The report also explains how Educo tracks the effectiveness of resource allocation in line with the strategic objectives.

It was noted that Educo’s Strategic Plan did not contain any quantitative targets or deliverables against which it could measure progress towards its overall goals (though mention is made of annual targets in the 2018 report). Separate to this the IRP would like to know what plans Educo have for developing a new strategic plan (post 2018).

A3 Progress and challenges over the reporting period

The response explains how Educo’s current strategic plan will be evaluated in 2019. The evaluation will identify achievements and failures, lessons learned, and approaches that Educo should take or change in future. The outcomes of the evaluation will be shared in the next report and will feed into the development of Educo’s next strategic plan. It will be interesting to see whether the evaluation also includes findings on accountability to affected children.

As part of the new strategic framework, key social impact indicators will be defined – again together with internal and external stakeholder groups – and will allow ongoing monitoring of impact outcomes.

The Panel looks forward to reading about the results of the strategic plan’s evaluation, and the overall approach seems sound. However, we would have appreciated information about some of the key challenges and areas of progress Educo experienced in 2018 – this is the reason for the lower score assigned to this question.

A4 Significant events or changes regarding governance and accountability

Key changes in 2018 included the closure of country offices in Peru and Ecuador, establishment of a country office in pain, organisational
Restructuring with the Executive Committee splitting into two separate bodies, and the creation of a Global Management Committee. New Policy and Standards Commissions were also set up in country offices. The response explains how these changes are contributing to strengthening Educo’s work and impact.

### B. Positive results are sustained

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<tr>
<th>B1</th>
<th><strong>Sustainability of your work</strong></th>
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<tr>
<td></td>
<td>Educo believes that it is vital to understand the contexts of the places they work in, and to have the involvement and leadership of stakeholders, in order to ensure sustainability of their work.</td>
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<td>The report describes how various tools are used in the initial phases of projects to gain an understanding of the context. Specific strategies to ensure sustainability are included in project design, with some of these listed.</td>
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<td>Two examples are provided, from Educo’s work in the Philippines and Bangladesh, illustrating achievements as a result of working in partnership with local actors.</td>
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<td>In future reports, is Educo able to provide examples (and some metrics) of how exactly its work is leading to longer-term impact and outcomes? In the examples provided in this report, more immediate outcomes are evident, but an explanation of how these may be carried into the future would be helpful.</td>
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<th>B2</th>
<th><strong>Lessons learned in the reporting period</strong></th>
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<td>The response explains Educo’s approach to learning – the Panel finds it to be sound and meaningful, with evident efforts to institutionalise learning in both programmes and operations.</td>
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<td>Educo has created a number of tools to guide learning over the past two years (are these geared towards use by partners/third parties, or by Educo staff?). These have been implemented and tested during 2018, and will be reviewed and improved if needed in 2020. Are any of these tools publicly available? The Guide for Learning, for example, sounds like it could be of interest to other organisations.</td>
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<td>Two specific lessons learned are shared from Educo’s work in India and Burkina Faso. The Panel would also be interested in learnings relating to</td>
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non-programme related areas, such as internal processes or staff issues. Can Educo share any examples in this regard in its next report?

Also, could Educo provide some more information on how lessons learned are shared with internal and external stakeholders?

C. We lead by example

C1  **Excellence on strategic priorities**

Educo has prioritised working through networks and collaborations to achieve its strategic objectives. The report shares several examples of how Educo has contributed its expertise and provided leadership in networks and alliances.

This includes representing the ChildFund Alliance in the global child rights initiative Joining Forces, contributing to and presenting a study on early childhood in Latin America to the UN Child Rights Committee, and Educo’s CEO sitting on Accountable Now’s Board of Trustees.

Two more detailed examples are provided of Educo’s leadership in the promotion and protection of children’s rights in El Salvador and the Philippines.

C2  **Expertise is recognised and welcomed by peers and stakeholders**

Educo refers to the representative roles outlined under C1 above – being chosen for these roles demonstrates the recognition of its efforts and expertise on protecting children’s rights. The media presence Educo has in the countries they work in is also flagged as being the result of trust placed in them by other children’s rights organisations.

Stakeholders in the communities Educo works in are consulted about Educo’s work and the participation mechanisms they use. Examples of positive feedback from communities in Nicaragua and El Salvador are shared.

The response also lists some examples of more formal recognition and awards Educo has received for its work in 2018.

C3  **Inclusivity, human rights, women’s rights and gender equality**

The detailed response explains Educo’s child rights based approach to its activities and organisational culture. Educo has improved its tools and materials for working with children, and there is a focus on participation,
as well as tailoring methodologies to different ages and needs. Examples of some of these tools are provided.

Highlights from Educo’s work focusing on different rights holders and minorities are also shared – this includes work to increase the inclusion of children and adolescents with disabilities in a community in Bolivia, and efforts to strengthen child focused and gender sensitive emergency protection responses for displaced Rohingya.

Regarding gender specifically, the response states that Educo has strengthened application of its Gender Equity Policy over the past two years, both in programmes and within the organisation. The reference person for gender at Educo’s head office has increased the proportion of her work on gender issues to 50%, a Guide of Inclusive Language has been created and all staff have completed training on gender-based approaches.

Examples of efforts to strengthen gender-based approaches in different country offices (and with local partners) are shared, as are examples of advances in the application of the Gender Equity Policy in programmes. The report notes that there are still disparities between the countries Educo works in, due to cultural differences and different opportunities and partnerships.

In the next report the Panel would like to see some more information on Educo’s approach to inclusion beyond gender at the organisational level, e.g. in hiring and the working conditions available to staff. Examples to refer to in this regard include CBM’s accessibility policy or Restless Development’s recruitment and equal opportunities policies (see pp. 24-27 of their Employee Handbook).

C4 Minimising negative impacts on stakeholders

Educo’s Child Safeguarding Policy guides the creation of a caring and protective environment, with a special focus on vulnerable children and adolescents. The Panel notes that the policy is currently being revised, with the response stating that a new version will be available shortly.

In 2017 and 2018 Educo has been strengthening the structures that are in place so that safeguarding mechanisms work in practice. A variety of efforts are listed, including the establishment of a Global Commission for the implementation of the Safeguarding Policy, safeguarding focal points
in each country office, training of staff, regional learning networks, and supporting local partners in developing their own policies.

Key actions for 2019 are outlined; the focus is on promoting the new version of the safeguarding policy with internal and external stakeholders, and strengthening the associated accountability mechanisms. Lessons learned are also shared – these centre around ensuring visibility, legitimacy, and proper resourcing of the safeguarding committees and focal points.

Educo sees active participation of stakeholders as key to reducing the risk of negative impacts. Steps to this end in the project cycle are listed, including assessing existing community mechanisms for protection, risk assessments, awareness-raising, and prevention measures.

Overall, Educo’s approach appears sound. In the next full report the Panel would also like some more information on policies or procedures beyond those specifically relating to safeguarding (the Ethical Code is of relevance here, for example). How does Educo mitigate other unintended negative impacts of projects, such as on local organisations? A good example to refer to is CARE’s guidance around managing risk in their global advocacy manual (pp. 39-42).

C5 **Responsible stewardship for the environment**

A proactive commitment to mitigating negative environmental impacts is evident within Educo. The organisation’s Environmental Policy guides the reduction of greenhouse gas emissions in programmes as well as daily running of the organisation, and a commission monitors the implementation of the policy.

The report shares initiatives from country offices and the head office; these include saving electricity, reducing travel by opting for online meetings and remote working, encouraging the use of public transport, and requesting biodegradable/recyclable packaging when purchasing food.

In its programmatic work, Educo engages in awareness-raising in schools, promotes recycling and reuse of materials, encourages the creation of school vegetable gardens, and strengthens knowledge of the nutritional value of food. In 2018 an environmental impact study was conducted for Guatemala’s Ministry of the Environment and Natural Resources, for the construction of project infrastructure.
Graphs show Educo’s carbon footprint for 2018, broken down by emission type and office. Consolidated figures are provided for each year since 2015, and the report explains that although emissions have increased overall, there have been decreases in emissions from the transport of materials, and in direct emissions from the organisation (though this figure has increased again from 2017 to 2018).

Once the carbon footprint of all workplaces and activities has been consolidated, Educo will begin working with country offices to define specific objectives for reducing emissions.

## Cluster B: Stakeholder Involvement

### D. Key stakeholders are identified with great care

#### D1  **Key stakeholders and how they are identified**

Educo’s stakeholders are broadly divided into rights holders (children), duty bearers (family, community, civil society and private sector) and principal duty bearers (states and international organisations). The report lists and explains specific stakeholder groups in more detail. Educo prioritises low-income families, pregnant adolescents, and adolescents that have survived trafficking, smuggling, and commercial sexual violence.

Stakeholders are identified through a child rights-based approach, and based on institutional strategic planning. Child Rights Situation Analyses are carried out in a process involving different actors, including children. Local populations help determine projects, the role Educo should play, and which groups are most vulnerable or at risk of exclusion.

When undertaking stakeholder analysis, mechanisms are adapted to local contexts. These usually include local consultations, mappings and base line studies. Regular monitoring of projects allows Educo to ensure no one is excluded directly or by omission, and to make timely adjustments where necessary.

Overall, the Panel finds Educo’s approach to be strong.

#### D2  **Reaching out to those impacted or concerned by your work**

The information for this section is included under questions E1 and E2.

#### D3  **Maximising coordination with others operating in the same space**

3
Educo prioritises working in close collaboration with local communities and social actors. A **Partnership Policy and Guide** defines their approach to working in partnership: this is seen as a relationship based on social commitment, equity and respect. The guiding principles of partnership include participation, transparency, and a dynamic spirit.

Partner organisations work together with Educo throughout the collaboration process, and both sides are committed to complying with Educo’s policies.

The response explains how Educo makes an effort to maximise coordination with other organisations and avoid duplicating efforts, and provides some examples.

There is also information on how Educo works with politically relevant networks and platforms at both country level and globally.

### E. We listen to, involve and empower stakeholders

#### Stakeholder feedback

The report explains how Educo receives – and actively invites – feedback from stakeholder including staff, supporters, partner organisations, and programme participants.

A **Complaints and Feedback Policy** guides mechanisms at global and country level – each country office adopts mechanisms most appropriate for their context.

Mechanisms to gather feedback from staff include a global questionnaire and focus groups as part of the evaluation of the Strategic Plan. Findings from these processes will feed into the next strategic plan. A global questionnaire about organisational culture has been conducted in line with the strategic cycle in the past, but will in future be conducted annually to be able to influence annual organisational development plans.

The people that support Educo can submit feedback via phone, email or social media, and Educo actively gathers their opinions through an annual satisfaction survey. The report explains what changes were implemented in response to the results.

Partner organisations can provide feedback through mixed commissions, online and in person meetings, workshops, and consultations. An example is the annual meetings for the Social Action Project, where reflections and
good practices are shared, and joint and individual evaluations are carried out.

Two examples of how programme participants provide feedback to Educo are shared. A pilot project in Nicaragua co-created accountability initiatives together with children, and a baseline study indicated that most children agreed that Educo responds to the feedback they provide. The other example is from El Salvador, where a study of child-friendly accountability mechanisms (in Spanish) has been published. Children were consulted on the issue, and findings will be implemented, and the process replicated in other countries. More detailed information on feedback and participation at programmatic level is provided under question E2.

The Panel appreciates the detailed response on this topic, and finds Educo’s approach to be strong.

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<th>E2</th>
<th>Stakeholder engagement</th>
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<td></td>
<td>Educo makes a serious effort to engage its key stakeholders, children, in projects. A set of <a href="#">Child Participation Standards</a> provide guidance to Educo and its partner organisations on how to work alongside children to ensure their active participation.</td>
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<td>The report explains in detail, and with examples, how children participate in all stages of projects, from conception and planning through a participatory Child Rights Situational Analysis process, to planning, implementation, and evaluations. Approaches are tested and learnings are shared – for example, based on a prototype children’s open day in Mali, a methodological guide was put together to allow other country offices to replicate this practice. Educo is also highlighting the fact that it is necessary to carry out capacity building on children’s rights in order to best involve them in monitoring, evaluation, accountability and learning initiatives, and that it is important to be flexible and adapt to children’s needs during these processes.</td>
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<td>The final example provided in the response also explains how other stakeholders beyond children (local public authorities, community leaders, and women’s representatives) were also involved in the design, implementation, monitoring and evaluation of a project in Senegal.</td>
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<td>Information about stakeholders’ involvement in the creation of Educo’s strategy is provided under question A2.</td>
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The Panel commends Educo on its strong approach to stakeholder engagement and highlights this as a good practice.

**E3 Main likes/dislikes from stakeholders and organisation’s response**

The report explains that information about suggestions, complaints and commendations received and lessons learned in 2018 is included in Educo’s Annual Complaints and Feedback Report, which will be available on the website soon. The Panel looks forward to seeing this report in order to gain insights into key themes or trends.

The information is also summarised under question J3. The majority of complaints seem to be about the quality of rights in education, and positive feedback was on marketing campaigns, access to information, and organisation of meetings. The Panel would also be interested in knowing how Educo has responded to these, particularly the complaints.

**E4 People and partners have gained capacities that last beyond your immediate intervention**

Information on the sustainability of programmes is provided under question B1. While that response states that project participants are trained and their capacities are developed and strengthened, some more information/examples on this would be welcome in the next report.

**F. Our advocacy work addresses the root cause of problems**

**F1 Evidence regarding the root causes of the problems you address**

Educo’s advocacy positions are consistent with programmatic objectives, and are based on evidence generated by fieldwork with key stakeholders, research, and policy analysis.

There is an institutional protocol for the construction of positioning documents. The protocol defines four tools that should be available to formulate and share Educo’s positions on issues: position papers, advocacy statements, policy briefs, and fact sheets.

The positions Educo takes are based on Situational Analyses of Children’s Rights (CRSA), studies, and social research. The CRSA allow Educo to identify gaps, which their projects, workshops, and advocacy actions are designed in response to. Evidence is also gathered through fieldwork alongside partner organisations and local communities, and reports and research through alliances Educo is part of. Educo also draws on publications from other NGOs and universities.
The report provides some information about the effect the evidence Educo has collected has had, and shares examples from Bangladesh and El Salvador.

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<th>F2</th>
<th><strong>Stakeholders support your advocacy work and value changes achieved</strong></th>
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<tr>
<td></td>
<td>Educo’s advocacy efforts are aimed at solving priority problems as</td>
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<td>recognised by affected people, and often emerge from the requests</td>
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<td>and experiences of the people Educo works with. Educo collaborates</td>
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<td>with local communities and partners in defining and implementing</td>
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<td>their advocacy work.</td>
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<td>An example is provided from a project in Spain, which was conducted</td>
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<td>together with a <a href="#">Children’s Council</a> (information in Spanish).</td>
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<td>The Council provided opinion and proposals, and took part in analysing</td>
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<td>research results and putting forward recommendations for action. In</td>
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<td>addition, almost 1000 children provided inputs through interviews</td>
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<td>and questionnaires.</td>
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<td>Another example explains how children participate in the [Child</td>
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<td>Friendly Accountability initiative](#), which supports children in</td>
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<td>holding their governments to account. Children are involved in</td>
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<td>identifying problems and solutions, and they participate in</td>
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<td>negotiations between decision makers.</td>
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<td>The report also shares examples of how other stakeholders are</td>
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<td>involved in advocacy processes, including partner organisations,</td>
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<td>local decision makers, and the public.</td>
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<td></td>
<td>The Panel commends Educo on its sound and participatory approach to</td>
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<td>advocacy.</td>
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| G. We are transparent, invite dialogue and protect stakeholders’ safety |
| G1 | **Availability of key policies and information on your website** |
|    | Educo has an External Transparency Policy which guides what        |
|    | information is published externally and how it is accessed. The    |
|    | report provides an overview of the information that is available on |
|    | Educo’s website, which includes organisational/governance         |
|    | information, policies, position documents, strategic and work      |
|    | plans, finances, impact, and feedback/complaints. Most of the     |
|    | information is available in English,                             |
Spanish and French, and the Panel notes positively that the Strategic Plan is also presented in a child-friendly comic strip (in Spanish).

Educo has received certification against the CONGDE Transparency and Good Governance Tool, and has broadened the information they put on their website as part of this process, for example salary ranges.

The report also explains that new websites and social media channels were set up for several country offices in 2017 and 2018, which allow for the publishing of information which is better adapted to local contexts and in local languages, increasing accessibility.

Educo is a member of the CHS Alliance, UN Global Compact Platform, and the Spanish Global Compact Network.

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<th>G2</th>
<th>Pay scale, gender pay gap and top salaries</th>
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<td>Educo’s Head Office and other offices in Spain have salary ranges according to job level, available online. The other country offices use salary studies carried out by a consulting firm, which guarantee equity in compensation and allow Educo to adjust to local contexts. The report lists the top five salaries in the organisation and the ratio between highest and lowest wages. Educo is committed to an equal organisational structure, which should lead to gender equity. Although the gender pay gap has not been measured to date, Educo intends to do so in 2020. This process will also include the analysis of the causes of any wage differences, allowing Educo to take action to address any gaps. The Panel appreciates this approach and looks forward to reading about the results of the analysis in future reports.</td>
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<th>G3</th>
<th>Ensuring privacy rights and protecting personal data</th>
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<td>Educo has been working, together with a consultancy firm, throughout 2018 and 2019 to update its policies and procedures around data protection and privacy, in response to a 2018 revision of relevant Spanish law. Educo’s Privacy Policy (description in English, full policy in Spanish) explains their security measures and how they process data, with the aim of guaranteeing privacy and being transparent about how they use supporters’ data. The Panel notes positively that Educo contacted all of its supporters to inform them of the new policy and remind them of how they can access, amend, or request the deletion of the data Educo holds</td>
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on them. It is also commendable that a dedicated email address has been set up for data protection related queries.

The organisation’s Cookies Policy and Terms of Use have also been updated to reflect the requirements of the new legal framework, and protocols have been developed on the treatment of personal data, for the HR, Finance, Communication and Supporter’s Services departments.

The Panel commends Educo on its approach, which it considers a good practice.

G4 Largest donors and their contributions

Educo’s five largest donors in 2018 are listed together with the amount of their contributions.

Cluster C: Organisational Effectiveness

H. Staff and volunteers are enabled to do their best

H1 Recruitment and employment is fair and transparent

The report provides an overview of human resources tools which ensure fair and transparent recruitment and employment processes. This includes an International Human Resources Manual, which country offices adapt in line with local legislation, a guide to implementation of Educo’s new human resources system, an ethical code and a gender equity policy. The latter includes detailed outcomes, indicators, activities and a timeline, covering 2016-2019.

Educo is committed to recruiting locally, to facilitate empowerment and strengthened capacities of local communities, and to favouring internal promotions. In 2018 there were 4 expatriates out of a total of 1004 staff in the whole organisation.

Tables are provided showing a breakdown of employees, volunteers and interns by country, contract type, level of responsibility, gender, age, and nationality. The Panel would also be interested in knowing the gender breakdown within level of responsibility, i.e. how many of the heads of department are female and male.

The report also speaks about staff with disabilities – their inclusion is seen to positively strengthen Educo’s organisational culture. However, this is a
challenge, particularly in country offices. In 2018 0.2% of staff had a disability.

**H2 Staff development**

Educo aims to establish consistent criteria for training throughout the organisation and in 2018 created global training plans on various issues. Staff are encouraged to use the “Development Room” online learning tool and it is hoped that by the beginning of 2020 all Educo staff will be registered on the platform. The report flags as a challenge the registering of hours that offices invest in training staff, and states that this is something Educo is working to improve.

The report also explains the performance evaluation process, which involves 4-5 people (internal and external to the organisation) who have worked with a staff member. The staff member’s commitment, involvement of others in their work, and the way they inspire, empower and include others are assessed. Educo carried out trainings on the performance evaluation process in country offices in America and Asia and the head office in Spain, which has led to an increase in formal evaluations conducted (80% of all staff, up from 50% in 2016). The Panel commends Educo on this effort, and notes positively that training is also planned for country offices in Africa in 2019.

**H3 Safe working environment**

Educo’s Ethical Code guides the conduct of staff, and also establishes a commitment by Educo to guaranteeing the security, health, and wellbeing of employees, and building a positive and respectful working environment.

Each country office has an Employee Wellbeing Guide which includes issues such as equality between men and women and a good work-life balance. The guides are adapted to local contexts and legislation. The Spanish offices have a protocol for acting in violent situations, which will also be adapted by country offices in 2019.

The report explains how concerns and complaints can be raised – through a Suggestions, Complaints and Commendations Management Policy, a regulatory compliance reporting channel, and a Child Safeguarding Policy. More detailed information on these and on Educo’s Complaints and Feedback Policy can be found under question J3.

Educo also has a Security Policy (in Spanish), which the organisation has progressed on implementing during 2017 and 2018. In 2017 a new role,
Head of Security, was created, and security training has been conducted in all country offices. There is a Protection Guide for travelling safely and staff has also been trained on this in 2018 and 2019.

I. Resources are handled effectively for the public good

1. Resources are acquired in line with your values, globally accepted standards and without compromising independence

The report explains a number of policies and processes that guide Educo’s funding. In terms of fundraising from individuals, Educo works in line with the Spanish Fundraising Association’s Code of Conduct for Development Fundraising in Spain. Educo also has a new Donation Policy, a Policy for Collaborating with Companies (in Spanish), and an Investment Policy which aim to ensure that funds received do not restrict the free action of the organisation.

Educo is accredited with Fundacion Lealtad, which certifies compliance with transparency and plurality in funding and control in use of funds, amongst others. Educo’s transparency and good practice report is published on the organisation’s website.

Finally, the report explains Educo’s approach to diversification of funds, with increasing funds from public sources included in the Strategic Plan. Priorities in this regard for 2019 are outlined, and include increasing external funds and strengthening partnerships.

The Panel appreciates this comprehensive response and sees Educo’s various policies and efforts as a good practice.

2. Monitoring of progress and re-allocation of resources

The report explains how Educo’s Strategy, Planning and Development Department reported to the Executive Committee about the fulfilment of the 2018 Annual Operating Plan, allowing the governing bodies to make decisions about reallocating resources in order to achieve the annual objectives and to improve effectiveness and efficiency.

Examples are given of the modification or creation of new activities, and reallocation of resources, in 2018 in line with an analysis of internal strategic projects.

Also throughout 2018 a new internal results-based management model was created, including project management methodology and an
Institutional monitoring and reporting system. The aim is to have timely and useful information to inform continuous improvement.

I3  **Minimising risk of corruption, bribery and misuse of funds**

Educo’s finances are externally audited annually, with the audited financial statements published online and shared with the relevant supervisory body in Spain. Most projects are also subject to audits.

An Audit and Compliance Unit aims to improve risk management, control, and governance processes. A Code of Conduct for Internal Compliance Standards has been created in line with a legal risk prevention framework, and a committee oversees its implementation and dissemination.

Educo’s [Anti-Fraud and Anti-Corruption Policy](#) guides the prevention, detection, reporting and investigation of incidents. The policy was reviewed in 2018 to adapt it to new legal regulations and current needs of the organisation. This process led to the development of a manual on the Prevention of Money Laundering, Terrorist Financing and Control of Payments in Cash.

Educo has a map of risks, uses an app to monitor traceability and responsible use of funds, and expenses are subjected to budget control and approvals from different levels.

One case of corruption was received and resolved in 2018.

### J. Governance processes maximise accountability

#### J1  Governance structure and recruitment of trustees/board members

Information is provided about Educo’s governance structure, including the roles of the Board of Trustees, the Board Delegate Commission, the Executive Director and the Executive Committee.

The Board’s Appointments Committee oversees the appointment of trustees. In the next report, can Educo explain what the committee considers when assessing candidates, e.g. individual skills/experience, and diversity needs?

The current Board is composed of [nine members](#), seven of them male and two of them female. Are there any targets with regards to gender representation?

#### J2  Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes
Educo’s board approves and reviews institutional policies, the budget and finances. Periodic reports on the implementation of Educo’s annual operating plan are presented to the board and inform re-planning processes. A map of risks is presented to the board annually (more information on this is under question I3), as is an annual global report on complaints, commendations and suggestions Educo has received.

<table>
<thead>
<tr>
<th>J3 and J4</th>
<th><strong>Complaints handling mechanisms and overview of complaints</strong></th>
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<td></td>
<td>Educo’s <a href="#">Complaints and Feedback Policy</a> is applicable to both internal and external stakeholders. A Global Implementation and Monitoring Commission coordinates and supports country offices in their implementation and monitoring of the policy. By the end of 2018 all countries had local committees/focal points for complaints (up from 50% of countries in 2016) and have been creating action plans for 2019.</td>
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<td>The report lists several tools for the standardised implementation of the policy, focusing on monitoring, registering complaints sharing experiences and learning.</td>
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<td>Different mechanisms for submission of complaints are set up in different countries, according to local context and the needs and preferences of stakeholders. The report provides examples from Spain and Bangladesh. The most common mechanisms are email and suggestions boxes, but complaints can also be submitted via phone or in person.</td>
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<td>The report also explains how Educo has shared and promoted its complaints and feedback mechanisms in 2018, with examples given from two countries.</td>
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<td>Information about feedback and complaints received, including lessons learned, are compiled in an Annual Complaints and Feedback Report (this will be available on Educo’s website soon). The report shares an overview of complaints and feedback received in 2018 from internal and external stakeholders, the channel they were submitted via, and key themes.</td>
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<td>Lessons learned and areas for improvement include the need to strengthen internal processes related to complaints mechanisms in El Salvador, to strengthen the sharing of mechanisms (the number of complaints received is considered to be low), and to improve communication and foster people’s trust in formal submission channels. Educo will also review how it handles complaints received via social media. Overall though, the management of submissions has improved,</td>
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and changes in response to complaints and feedback received have had greater impact. Can Educo share some examples of these changes made, both in response to external and internal feedback (e.g. meeting organisation and access to information)?

Educo aims to work together with people who submit feedback in order to achieve the best possible resolution of the issue. Those submitting complaints or feedback are asked to evaluate the way the issue was handled, and Educo plans to analyse this information to monitor levels of satisfaction with the process.

Finally, the Panel also appreciates that Educo was an active participant in Accountable Now’s peer advice group on complaints and feedback mechanisms.

Overall, Educo’s approach is strong. In future reports, the Panel would like to know more about any specific mechanisms for children to submit feedback and complaints and to what extent these are used, as well as whether there are any specific separate complaints channels for staff, such as a whistleblower mechanism. Also, as mentioned above, some specific examples of changes implemented in response to feedback received would be welcome.

**J5 Protecting confidentiality and anonymity of those involved in complaints**

The report states that confidentiality is one of the key pillars guiding the management of complaints. The Suggestions, Complaints and Commendations Management Policy and the Child Safeguarding Policy both establish measures for ensuring confidentiality, and define who will receive information about complaints received, the response provides some details on this.

Although Educo publishes a global report on the feedback received and lessons learned, no data which could reveal the identity of the complainant is included.

**K. Leadership is dedicated to fulfilling the 12 Commitments**

**K1 The governing body and management are held accountable for fulfilling strategic promises**

Educo’s board undertakes a self-assessment every two years, with the last one conducted at the end of 2018. The report provides information on the questionnaire used, and the process to analyse results which is currently underway. Preliminary results include the need to strengthen the
recruitment process for new trustees, to establish trustee sub-commissions on certain functions, and to reinforce training for trustees so they can better respond to the organisation’s needs.

The Executive Management gives an accountability presentation for all staff at the beginning of each year, sharing achievements and challenges, and objectives for the coming year.

However, it was not clear if and how the CEO is evaluated – is there an assessment by the board, for example? The Panel requests more information on this in the next report.

### K2 Inclusion of staff in discussing progress toward organisational accountability

The report provides information on Educo’s new internal management model, which allows for a more dynamic organisation with more distributed leadership, and which leads to team empowerment, transparency, and internal accountability.

An internal monitoring and accountability system measures, analyses and reports on 16 strategic internal transformation projects, and information is shared throughout the organisation. The report also explains how all departments in the organisation contributed to a consultation process about adjusting internal procedures in line with the CONGDE Transparency and Good Governance Tool.

Information about how staff are involved in the accountability reporting process is provided under question K3, and the Panel finds this to be sound. We would only want to know whether the Panel’s feedback and key recommendations are shared with staff other than the Executive Committee?

### K3 Scope of this accountability report and influence over national entities

The report covers Educo’s head office and all country offices. The response explains how the different offices contribute information for the report through an online survey, and how this information also feeds into other reporting processes.

For the 2018 report, Educo carried out a consultation session with each department, presenting the new reporting framework and collecting proposals for topics to include.
| The report, as well as a more reader-friendly and visual Executive Summary, are shared with all Educo staff, on the website, and via Educo’s blog and social media. The final report and the Panel’s feedback are also shared with the Executive Committee. |