



**Accountable
Now**

GLOBAL STANDARDS LOCAL TRUST



Greenpeace International Independent Review Panel Feedback

Accountability Report 2018

Review Round September 2019



Greenpeace International

Feedback from the Independent Review Panel

Review Round September 2019

07 October 2019

Dear Bunny McDiarmid and Jennifer Morgan,

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.

Greenpeace's eleventh accountability report is for the first time combined with the organisation's annual report. The organisation's commitment to dynamic accountability, particularly the aspects of collaboration, working in partnership, and learning, is clear throughout the report.

The Panel appreciates Greenpeace's efforts to include accountability issues in its key outward-facing report for the year. However, this made it more difficult for the IRP to identify relevant information for some of the questions. At times we felt there was insufficient detail or illustrative examples for certain questions, and not as much of a focus on challenges and difficulties – though we did appreciate the case studies and direct quotes from activists and members which were provided.

There were also an absence of links provided to the policies, reports, and websites/pages mentioned throughout the report, making it difficult to fully understand some of the processes described. The Panel believes the majority of the organisation's policies should be able to be included on the website, and encourage Greenpeace to do so.

Areas of strength in this report included Greenpeace's approach to learning (B2), working in partnerships (D3), and gathering evidence to underpin its advocacy work (F1).

Notwithstanding this, the Panel continues to be concerned by the fact that Greenpeace still does not have an **external complaints policy** or mechanism in place (question J3). This has been flagged as an important point for improvement in the IRP's feedback letters for several years now, and while the report states that a policy is planned to be implemented in 2019, at the time of review (September 2019) no information about this was found on Greenpeace's website. The Panel would like to discuss progress on this issue in our follow-up call to this feedback letter.



Other **areas for improvement** to focus on in the next interim report include minimising negative impacts on stakeholders (C4), identification of stakeholders (D1), main likes/dislikes from stakeholders (E3), availability of key policies on the website (G1), board oversight of policies, resources etc. (J2).

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





Greenpeace International's Accountability Report 2018

Review Round September 2019

Opening Statement from the Head of Organisation

The opening statement by co-Executive Directors Jennifer Morgan and Bunny McDiarmid states that Greenpeace has found new ways to respond to environmental issues and movements around the world.

A number of key achievements from the year are listed. It is mentioned that Greenpeace has tried new ways of working, and developed more systematic and holistic approaches to supporting the environmental movement. The Open Campaigning initiative, where people run their own campaigns, is an example.

Greenpeace has been thinking about their contribution to the movement and has developed tools and resources for building power, sharing knowledge, and gathering feedback. This is linked to the organisation's understanding that it has limitations and that these are best overcome by "the wisdom of the crowd" and by connecting with others.

The statement also refers to Greenpeace's efforts to reflect a commitment to accountability, diversity and integrity and to ensure a safe and equitable working environment. This includes strengthening the Integrity System with a new global Code of Conduct which sets out standards for working together. This is also the first year in which Greenpeace will publicly report on Integrity and Whistleblower complaints.

Whilst there is a stronger link to accountability in this year's opening statement, we would still like to see more direct information about the top accountability related successes and challenges, and the areas flagged by the Panel for improvement in the previous report, as requested in the [reporting framework](#) (pg.1). If this does not fit into the focus or format of the annual report, it could be provided as an additional attachment.

Cluster A: Impact Achieved

A. The impact we achieve

A1	Mission statement and theory of change	4
	The report refers to the Greenpeace Framework , which guides and prioritises the organisation's work at a global level. The Framework includes the organisation's mission and theories of change for disruption and culture. More information, including Greenpeace's vision and values, can be found online .	



A2	<p>Key strategic indicators for success</p> <p>Though not linked in the report, Greenpeace's 2018-2020 Strategic Plan is available online. The plan includes annual priority areas covering collaboration, impact, operations, decision making, and effectiveness.</p> <p>The key indicator of success is if global warming has not risen to 1.5C in 10 years' time. Beyond that, the report states (on pg. 21) that measuring successes en route to that goal is complex and not easily defined. It outlines how metrics for measuring impact vary, and explains that Greenpeace is making progress on measuring impact, but not in a systematic way. A particular challenge is that of attribution – what can clearly be identified as being due to Greenpeace's efforts.</p> <p>As Greenpeace provides updates on this in future reports, the IRP would also like to know how its various stakeholders are involved in identifying potential success indicators.</p>	2
A3	<p>Progress and challenges over the reporting period</p> <p>Although concrete success indicators have not been included (see A2 above), the report outlines general strengths, changes and challenges.</p> <p>Key "victories" from the year are outlined on page 8 of the report.</p> <p>The main challenge mentioned is that with the increasing seriousness of the climate emergency, a greater proportion of the organisation's programming needs to focus on this issue. This may mean that Greenpeace's work on other key issues (such as biodiversity) may decrease. In 2019 the programme mix for the next three years will be reviewed to ensure a greater focus on climate, whilst continuing other critical pieces of work.</p> <p>The report also explains how Greenpeace is working to assess and respond to rapid change. A Development Department is responsible for global reporting and planning in line with KPIs and standards, and a Programme Direction Office coordinates global evaluations. In future reports it would be appreciated if Greenpeace would share some of the findings from these departments.</p>	2
A4	<p>Significant events or changes regarding governance and accountability</p> <p>The section of the report referring to this question includes information on a range of developments and ways of working. They have not been reported here, as they mainly fall under other questions.</p>	3



	<p>There do not appear to be any significant changes in terms of governance, apart from the development of an Integrity Function at GPI and national offices. In terms of accountability the report refers to new initiatives to achieve Greenpeace's vision of a diverse and inclusive movement, a key one being the creation of a Model Code of Conduct, a Protocol on Handling Integrity Violations, and various supporting policies. Can Greenpeace provide links to these documents in future, and make them available on their website?</p>	
<p>B. Positive results are sustained</p>		
<p>B1</p>	<p><i>Sustainability of your work</i></p> <p>Greenpeace believes in the need for a long-lasting, sustainable movement. Key to this is developing strong connections with partners and supporters, widely sharing tools, systems and lessons learned, and co-creating effective campaigns. NROs and GPI report on the organisation's efforts in this regard, with a focus on impact and long term effects. Can any key takeaways from these reports be shared?</p> <p>The report lists some of the ways Greenpeace works towards sustainability. This includes using the Theory of Change to plan work impact beyond individual projects, continuously reporting internally and externally, working collaboratively, and using lessons from previous work to plan future activities. An example is provided from Greenpeace Africa, explaining how they worked with partners and communities over the past year.</p> <p>The report also explains how Greenpeace offers support, capacity, tools and training to partner organisations, the effects of which are expected to last beyond joint project work. A set of (proxy) metrics measure impact in sustainability and capacity strengthening. Initial findings indicating success include positive retention rates, people returning for action rates, satisfaction scores, and increased engagement over time. Further work is needed to be able to determine whether impact is sustainable in the long term (i.e. lasts beyond immediate interventions).</p>	<p>3</p>
<p>B2</p>	<p><i>Lessons learned in the reporting period</i></p> <p>The response explains Greenpeace's approach to learning and sharing lessons; this is seen to strengthen the organisation's work and their connection with partners.</p>	<p>3</p>



	<p>Learnings are gathered through evaluations, assessments, communities of practice, interactive project dashboards, and reporting by NROs. GPI helps coordinate this and share outcomes through a fully accessible evaluation database (is this accessible to internal stakeholders only, or do partners also have access?).</p> <p>The communities of practice allow for the sharing of information, knowledge, and learning both within and outside the network. Lessons are also shared through an evaluation portal on Greenpeace's intranet, through internal campaign updates and webinars, and externally via direct mail-outs, email progress reports, and social media updates.</p> <p>Learnings relate to a number of issues, including how Greenpeace works with public stakeholders, how they perform as part of a global movement, how to balance strategic planning and flexibility, and how to increase cross-issue work. The report lists key learning areas from 2017-2018.</p> <p>Notwithstanding the comments above, the learnings provided appeared relatively general in nature. In the next report the IRP would like to see more specific learnings, including how they will be used to improve the organisation's work moving ahead.</p>	
<p>C. We lead by example</p>		
<p>C1</p>	<p><i>Excellence on strategic priorities</i></p> <p>The section of the report flagged as relevant for this question explains how Greenpeace explores the root causes of the issues it campaigns on. The Greenpeace International Science Unit at the University of Exeter identifies and communicates scientific information on key issues, and identifies emerging trends and areas of concern. Findings feed into campaigns which are delivered through media and other engagement strategies and action.</p> <p>However, the Panel is looking for a more explicit explanation of how Greenpeace provides leadership/guidance. More information could be provided on how Greenpeace's research and campaigns are used by others, and on any external groups or initiatives Greenpeace coordinates.</p> <p>Examples to refer to in this regard include Educo (2018 report, pp. 13-14) and CBM (see pp. 18-20 of their 2017 report).</p>	<p>2</p>



C2	<p>Expertise is recognised and welcomed by peers and stakeholders</p> <p>The report explains that the public perception of Greenpeace is assessed through online surveys and national brand surveys. The IRP would like Greenpeace to share some of the findings from these in future reports, to highlight the key opinions and/or issues and whether public perception of the organisation increased or decreased.</p> <p>The relevant section of the report includes quotes from participants in a non-violent disruptive action (and training) in Finland which express appreciation for Greenpeace's support and leadership. Some further quotes of appreciation are included, such as from a local organisation in Brazil, but more varied/comprehensive examples would be needed to truly depict stakeholders' appreciation for the organisation.</p>	3
C3	<p>Inclusivity, human rights, women's rights and gender equality</p> <p>The Greenpeace Framework acknowledges that the key challenges we face, from climate change to inequity and social injustice, are closely linked. Greenpeace aims to ensure their work gives power across the range of social and environmental issues, and notes the need for more inclusivity and the need to incorporate human rights and gender equality issues. In 2019 priority campaigns were audited to ensure that social justice objectives are incorporated. In 2017 Greenpeace adopted a Policy on Indigenous Rights, which indicates the organisation's intent to strengthen the way they work with indigenous peoples, and an example of what this looks like in Canada is provided on pg. 22.</p> <p>Internally, there is a focus on increasing the diversity of staff, volunteers, board members and partners. There is a specific team at GPI for implementing integrity, justice, safety and diversity measures, and a number of global initiatives are mentioned. These include creating persons of trust positions, the Model Code of Conduct, and supporting policies such as a preventing harassment and sexual harassment policy and an anti-discrimination policy – the Panel strongly encourages that links to these policies be made publicly available. The report also talks about the Greenpeace Rainbow Network's efforts to increase the inclusion and participation of LGBTQIAP+ persons internally (including in leadership) and to support and join pride events.</p> <p>In future reports the Panel would like to know whether Greenpeace has any policies on gender equality or diversity, both in relation to its work and campaigns, and internally. Examples to refer to in this regard include CBM's policy framework on inclusion and accessibility policy, or Restless</p>	3



	Development's recruitment and equal opportunities policies (see pp. 24-27 of their Employee Handbook).	
C4	<p>Minimising negative impacts on stakeholders</p> <p>The report explains the mechanisms in place to ensure a safe and just environment within the organisation – this is addressed under question H3 on safe working environment.</p> <p>It wasn't very clear which sections of the report explained how Greenpeace aims to minimise negative impacts on its external stakeholders. There is information on how Greenpeace collaborates with partner organisations and community groups when building and implementing campaigns, and this is covered under questions D2 and D3. Greenpeace has a Model Code of Conduct and Integrity policies, but as these were not linked, we were not able to assess to what degree this relates to internal or external interactions.</p> <p>Does Greenpeace have a Safeguarding Policy? Are there risk assessments when planning and carrying out projects? An example of the type of information we are looking for is CARE's advocacy handbook which includes a section on risk management (pp. 39-42), outlining how they understand and mitigate unintended negative impacts on the people they work with, including partners.</p>	1
C5	<p>Responsible stewardship for the environment</p> <p>Greenpeace not only campaigns on environmental issues; they also strive to live by the values they promote. This means limiting environmental impact as much as possible, and tracking and reporting on their impact.</p> <p>Transport-related carbon emissions is a key area in which Greenpeace is trying to reduce impact. In 2018 GPI strengthened travel booking procedures to assess whether flights were deemed absolutely necessary before booking. The Panel would have liked to see more information on how the organisation is working towards reducing transport-related impact, also at NRO level.</p> <p>In 2018 Greenpeace switched to a new data analysis tool which is more accessible, user friendly, and timely. Data on emissions for the years 2014-2018 is provided on pg. 44 of the report. While Scope 2 emissions (indirect emissions from sources controlled by Greenpeace) decreased in comparison to 2017, Scope 1 (direct emissions) and Scope 3 (emissions from sources not controlled by Greenpeace) increased. It is noted that</p>	2



	<p>air travel emissions for GPI show an increase because emissions for GPI staff working in NROs were still included under GPI.</p> <p>The report did not explain other initiatives Greenpeace has in place to reduce its impact, with overall emissions increasing from the previous years (per page 44 of its report). The 2016 report had provided an insight into this, e.g. the Environmental Initiatives Baseline and benchmarking of NROs' environmental impact against each other. That report had also referred to Greenpeace's environmental policy, which the Panel would want to see publicly available online.</p> <p>In future reports, we would like to hear more about the above mentioned policies and processes, as well as about initiatives to reduce the environmental impact of Greenpeace offices and programmes.</p>	
<h2>Cluster B: Stakeholder Involvement</h2>		
<h3>D. Key stakeholders are identified with great care</h3>		
D1	<p>Key stakeholders and how they are identified</p> <p>Greenpeace's traditional stakeholders are their financial supporters, volunteers, online communities, allies and activists. The organisation is now looking beyond this, with additional stakeholder groups now including those entities Greenpeace seeks to persuade, and those who depend on the industries and ecosystems impacted by Greenpeace campaigns.</p> <p>It is stated that stakeholders are identified through detailed analysis as part of the campaign planning process. The Panel would like to see more information about this in future reports, as well as an insight into how stakeholders are prioritised. Are local partners/communities involved in identifying others who should be engaged in Greenpeace's work?</p> <p>The 2016 report (pg. 16) had provided some more information, stating that, "stakeholder analysis should identify and analyse the motivation and needs of specific groups of people, communities and organisations as primary or secondary stakeholders. It explains how we will engage them, why, and whether (or how) we will be accountable to them." This could be built on in the next report.</p>	2
D2	<p>Reaching out to those impacted or concerned by your work</p> <p>Greenpeace sees understanding and engaging with stakeholders on strategic issues as key to achieving greater impact. Annual supporter and stakeholder data analysis is conducted, and direct feedback is gathered</p>	3



	<p>through individual conversations, digital media platforms, and social media. Through these channels Greenpeace discusses emerging issues with supporters and tracks their sentiment. Greenpeace also runs public petitions to get the public engaged in their work and has dedicated supporter email and phone lines.</p> <p>The Panel would like to know more about how Greenpeace reaches out to supporters, local communities and partners in person, or in a more targeted way than the broader feedback channels mentioned here. An overview of the organisation's approach would be a useful complement to a number of examples which were provided. It would also be helpful to understand how the organisation reaches out to stakeholders who are not supporters of Greenpeace, such as those the organisation seeks to persuade (as mentioned above under D1).</p> <p>The report explains that in 2017 Greenpeace adopted a Policy on Indigenous Rights, which indicates the organisation's intent to strengthen the way they work with indigenous peoples. It is stated that the policy has been adopted and implemented across the Greenpeace network. Examples of what this looks like in Canada (pg. 22) and Brazil (pg. 13) are provided.</p> <p>There is a case study from Greenpeace Mexico (pg. 39), explaining how the organisation reaches out to local allies and networks through volunteers.</p> <p>The report also shared that the work of coordinating and working with national and local allies and key stakeholders is mostly done by individual NROs. There aren't currently systems in place to track or evaluate performance against agreed goals as accurately as Greenpeace would like. This is identified by Greenpeace as an area for improvement, and the Panel looks forward to an update on this in the next full report.</p>	
D3	<p>Maximising coordination with others operating in the same space</p> <p>Greenpeace believes in the need for a long-lasting, sustainable movement. Information about working in partnership and developing joint approaches is provided in the report. The focus is on developing strong connections with partners and supporters, co-creation of campaigns, and more relevant and impactful work. Can Greenpeace provide a more concrete explanation in future reports of what this looks like and whether there are any policies guiding its approach? How does Greenpeace identify the partners it works with?</p>	3



	<p>Greenpeace is increasingly collaborating with partner organisations and community groups to co-create campaigns. An example is provided from Greenpeace Africa, which conducted all its campaigns in 2018 with partners, and stayed in constant contact to jointly shape tactics. More detail is provided on the work with a particular partner, groundWork, and how this ensures a close link to local NGOs and that Greenpeace is complementing, not duplicating existing efforts. The report is also open about how Greenpeace worked to rebuild its relationship with groundWork throughout 2017.</p> <p>Another case study is from Greenpeace East Asia, where Greenpeace works in coalitions or through direct coordination with partners. The organisation aims to strike a balance between flexibility to the campaign's needs and ensuring consistent contact points are available, but the report flags that there is room for improvement in the consistency of the approach.</p> <p>The majority of the work of coordinating with national and local allies is done by NROs, but it is mentioned that there aren't currently systems in place to track performance against agreed goals as well as they would like. This is flagged as an opportunity for improvement in the report and the Panel looks forward to updates in this regard in future reports.</p>	
<p>E. We listen to, involve and empower stakeholders</p>		
<p>E1</p>	<p>Stakeholder feedback</p> <p>The report explains that feedback is gathered from stakeholders through a variety of means, including in person to campaigners and teams, through the website, dedicated email and phone lines, and via Greenpeace's social media channels. This allows the organisation to discuss issues with supporters, track sentiment, and adjust their work accordingly. Greenpeace also conducts online surveys to gauge the public's perception of and attitudes towards the organisation and its work.</p> <p>Some of the case studies included in the report show how the above processes work in practice. For example, in East Asia Greenpeace's campaigners and political staff are well networked and often receive feedback directly from communities and stakeholders. In Mexico, Greenpeace volunteers build relationships with local organisations and coalitions and pass on their feedback to project leads regularly. Direct dialog teams talk to people on the streets and monitor feedback from</p>	<p>3</p>



	<p>online and phone channels, and share the results with core teams. Greenpeace Canada regularly surveys its supporters. It would be interesting to know about any examples of changes made or decisions taken in response to stakeholder feedback.</p> <p>Information on how feedback is sought from partner organisations is included in sections B1 and D3. Overall, the approach to gathering feedback from external stakeholders appears strong. Does Greenpeace get feedback from those who do not necessarily support their work, and if so, how?</p> <p>The report did not include much information on how Greenpeace seeks feedback from internal stakeholders however. In the next full report the Panel would like to see more on this – are there staff surveys, strategic meetings, or other feedback mechanisms?</p>	
E2	<p>Stakeholder engagement</p> <p>The report notes that the practicality of engaging stakeholders varies from place to place, and states that Greenpeace will strive to understand and respect the contexts they work in, and adapt their approaches accordingly.</p> <p>Supporters are engaged in strategic decision-making processes and campaigns, mainly via surveys to assess opinion and shape Greenpeace's direction and focus. There is a commitment to developing campaigns that enable supporters to engage more proactively, and even create their own campaigns. Some more detail on what this looks like would be welcome, including how people are involved in monitoring/reflecting on Greenpeace's work. Greenpeace has developed metrics to measure their impact in terms of supporter engagement and initial indicators of success include positive retention rates, people returning for action rates, deeper engagement and satisfaction scores.</p> <p>There is a particular focus on engaging indigenous communities in the planning and implementation of campaigns and actions. Greenpeace also supports existing Indigenous led actions. Examples are provided from Canada (pg. 22) and Brazil (pg. 13).</p> <p>The engagement of partners is covered under question D3, though the focus is mostly on campaign planning and implementation. The Panel</p>	3



	would also be interested in if/how partners are engaged in monitoring and evaluation, and in Greenpeace's strategic processes.	
E3	<p>Main likes/dislikes from stakeholders and organisation's response</p> <p>The report includes some quotes from coalition members, activists, and Greenpeace offices from around the world, speaking about their experience working with/in Greenpeace. However only a few seemed to include specific likes or what improvements they would want to see. No examples of potentially negative feedback were included in the report.</p> <p>On pp. 12-14 the quotes express appreciation for Greenpeace's expertise and support in organising actions and campaigns. The quote on pg. 12 flagged increased transparency on decision making as an area for improvement</p> <p>The Panel appreciates these examples, but in future reports we would also like to see a summary of overarching themes from feedback received (both positive and negative). Were there likes/dislikes which were raised in several regions, or by a majority of stakeholders in one region?</p> <p>We would also like to know how Greenpeace is responding to this feedback – either by continuing or increasing their efforts in areas where they received positive feedback, or by making changes to address key dislikes.</p>	1
E4	<p>People and partners have gained capacities that last beyond your immediate intervention</p> <p>The report states that Greenpeace offers support, capacity, tools and training to partner organisations and supporters in order to build skills and capacity to strengthen the movement in the long term. An example is capacity and strategy building workshops on changing mindsets in Japan, Israel, Mexico and Indonesia. Some more examples of how stakeholders have gained new skills (or increased capacities) would be welcome in the next report, e.g. in terms of local/community campaigns.</p> <p>As mentioned under question B1 above, Greenpeace has a set of metrics to measure impact in sustainability and capacity strengthening. These are proxy indicators only, and more work is needed to establish whether the impact lasts beyond the immediate interventions.</p>	2



F. Our advocacy work addresses the root cause of problems		
F1	<p>Evidence regarding the root causes of the problems you address</p> <p>Greenpeace's campaigns and activities are informed by science. The Greenpeace International Science Unit based at the University of Exeter identifies and communicates scientific information on the key issues addressed by Greenpeace, and identifies new trends and areas of concern. Other ways of gathering evidence include conducting situation and power analyses, audience assessment, and gathering input from experts in the field.</p> <p>Greenpeace's efforts to engage stakeholders – particularly partner organisations – in developing campaigns, and to assess public opinion on the organisation's advocacy work, has been addressed above under D3, E1 and E2.</p> <p>Greenpeace has increasingly been exploring the mindsets and assumptions underpinning the issues it works on This “mindsets work” aims to change power dynamics and systems by changing commonly held mindsets. The report talks about initiatives in this regard, including a Mindworks lab in Greenpeace East Asia and a “mindbenders” group, which aim to turn theory and science around mindsets into practice. A report was produced to assess the progress of Greenpeace's work on this, identify challenges, and as a result design more focused campaigns; the Panel would be interested in the key findings.</p> <p>Overall Greenpeace's approach seems strong. Future reports would be strengthened by including some examples of how the gathering of evidence and how stakeholder input shaped a specific advocacy approach. It would also be useful to understand how the broader body of scientific evidence is used by Greenpeace, or whether its main reliance is placed on its own unit at the University of Exeter (which may not be seen by some as being completely objective in nature).</p>	3
F2	<p>Stakeholders support your advocacy work and value changes achieved</p> <p>As mentioned previously under questions D3, E1, and E2, Greenpeace includes their stakeholders' feedback, vision, values and needs in advocacy work, and co-creates campaigns together with partners, community groups, and indigenous people. This ensures campaigns are more relevant for the communities involved.</p>	3



	<p>Quotes in the report provide examples of positive feedback from activists and partner organisations on Greenpeace's campaigns.</p> <p>The information provided in the report focuses mostly on gauging support for certain issues, but the Panel would welcome more information on how stakeholders are involved in the planning, monitoring and evaluation of campaigns.</p>	
<p>G. We are transparent, invite dialogue and protect stakeholders' safety</p>		
<p>G1</p>	<p>Availability of key policies and information on your website</p> <p>Greenpeace's values, goals, cornerstone principles, and information about the organisation's structure and finances can be found on the website's about page.</p> <p>The report states that policies relating to complaints, governance, staffing and operations, as well as evaluations and statistics about the organisation are online in a variety of languages. However, we were not easily able to locate these, and there does not appear to be one place on the website which collates this information. The Panel requests that Greenpeace provide links to the relevant pages in future reports, and make key documents more easily accessible.</p>	<p>2</p>
<p>G2</p>	<p>Pay scale, gender pay gap and top salaries</p> <p>The report includes information on the salaries of senior management excluding the two International Executive Directors (IEDs), of each IED, and of compensation provided to board members. This information is also available in the organisation's financial reports (2018 report here, see pg. 55).</p> <p>In the next report we would also want to know the salaries of the top three staff members after the IEDs, or if this information cannot be provided, what salary bands they fall into. We would also like to know how salaries are set at both international and NRO level, and how Greenpeace ensures its salaries are fair and in line with local standards.</p> <p>A gender pay gap analysis of Greenpeace offices was conducted in 2018. The report states that the resulting document is internal and has served to address gender-specific inequities. Key statistics are shared: the average gender pay gap across all offices is 12% and on average people identifying as male have a 6% higher pay grade than those identifying as</p>	<p>3</p>



	female. In its next report, the Panel would encourage Greenpeace to share what actions are being taken to address inequalities.	
G3	<p>Ensuring privacy rights and protecting personal data</p> <p>Greenpeace has implemented a GDPR program to protect the privacy of staff, volunteer, freelancer and donor data. GPI has an information security officer who has implemented an information security program, including policies, standards and guidelines – the report states that these are on Greenpeace's intranet. New staff undergo training on these issues.</p> <p>There are a number of new policies which have been drafted in 2018 and which are pending approval. These include a staff privacy policy, data retention policy, and data breach notification procedure.</p> <p>The Panel would like to know more about how Greenpeace protects the privacy and personal data of external stakeholders, including activists and those who engage with Greenpeace online. Although not mentioned in the report, Greenpeace has a privacy and cookies page on their website, explaining what data Greenpeace collects, how it is used stored, and how people can access, amend, or request the deletion of the data relating to them.</p>	2
G4	<p>Largest donors and their contributions</p> <p>The report does not list Greenpeace's five largest donors and the amount of their contributions. The 2018 financial report (pg. 52) does however list the contributions from individual Greenpeace organisations (who provide it with around 95 percent of its funds). From an accountability perspective, the IRP feel (given the nature of the organisation) that it would be beneficial to include the five largest donors within the various Greenpeace organisations as a whole e.g. foundations or significant major private donors.</p>	3
Cluster C: Organisational Effectiveness		
H. Staff and volunteers are enabled to do their best		
H1	<p>Recruitment and employment is fair and transparent</p> <p>The report states that the GPI Talent Acquisition Project is a priority in 2019, aiming to establish global standards and processes which ensure recruitment reflects Greenpeace's diversity and inclusion principles. The report (pg. 28) provides an overview of these concepts, and the</p>	2



	<p>organisational culture Greenpeace seeks to create. The Panel looks forward to an update on these points in the next report, and can share as good practices Educo's ethical code and gender equity policy, Restless Development's equal opportunities policy (in their Global Employee Handbook, pg. 30), and Sightsavers' approach (see their 2017 report, pp. 22-24).</p> <p>Greenpeace is also developing its Global Compensation and Benefits Framework to establish minimum standards across the network, to ensure compensation and benefits are equitable, and in line with core global principles. Parental leave, annual leave and compassionate care leave are priorities.</p> <p>The report (pp. 28-29) provides an overview of staff and board members broken down by seniority, gender, region and age. Leadership positions seem to be slightly more commonly held by males, with a greater difference at Executive Director level.</p> <p>It would also be interesting to know the proportion of staff (and particularly senior/management level staff) who are local hires vs expats. The Panel does note that Greenpeace's last report explained that local hiring is the norm across the Greenpeace network, with 12% of staff in 21 NROs and in Greenpeace International non-local</p>	
H2	<p>Staff development</p> <p>Greenpeace International has a number of units and processes in place to support staff development. The Development Department coordinates monitoring, reporting, and planning around efficiency and effective administration. The Programme Direction Office coordinates global evaluations, conducted through internal and external consultants, and helps NROs with their responsiveness and knowledge sharing. Findings and learnings from these departments are shared with leadership and governance bodies and the public, via the coordination of the Executive Director's Office.</p> <p>Greenpeace International runs a Global Learning and Development Curriculum, with four main training programmes. These focus on global campaign training, a Future Leadership Programme for potential managers and leaders, Management Foundations training for middle managers, and a Global Project Masters Programme. There is further training for emerging and current leaders, based on a competency model</p>	2



	<p>which has been assessed by external consultants to ensure it supports the needs of the Greenpeace Framework.</p> <p>Greenpeace's approach seems to be comprehensive. The Panel has a few additional questions. How are training needs identified (during performance appraisals or elsewhere?) and do all staff undertake training and development every year, or only some staff members? Is training provided on issues other than leadership development? Are there also external training/development opportunities in addition to those offered by Greenpeace?</p> <p>The report states that a new performance management system has been introduced and is being piloted in GPI in 2019. The system focuses on regular check-ins and continual feedback throughout the year. Who is involved in these discussions; only the direct manager or also other colleagues? The Panel will be interested to hear in future reports how the new system is working and how it has been received.</p>	
H3	<p>Safe working environment</p> <p>The report quotes Greenpeace's IEDs highlighting the importance of "build(ing) and maintain(ing) our own organisation as a safe space for creative, collaborative activism". The organisation aims to create a working environment that protects the safety, dignity and equality of all staff, volunteers and activists.</p> <p>The report explains Greenpeace's duty of care obligations, and beyond legal responsibilities, adherence to the organisation's Essential Principles and Protocols for Actions and Legals (EPPAL), which guides the approach to risk taking in campaign activities. The EPPAL principles include the taking of calculated and smart risks and the primacy of individual rights. When campaigning, Greenpeace conducts risk assessments, warns people of risk, provides training on avoiding and minimising risks, deals with any incidents, and has security management plans to mitigate potential risks. Can the EPPALs be linked in future reports? The Panel believes this could be of interest to peer organisations.</p> <p>In terms of staff safety in the workplace, there is a specific team at GPI for implementing integrity, justice, safety and diversity measures, and a number of global initiatives are mentioned. These include creating persons of trust positions, the Model Code of Conduct, and supporting policies such as a preventing harassment and sexual harassment policy and an anti-discrimination policy – the Panel strongly encourages that links to these policies be made publicly available.</p>	3



	<p>There is a zero tolerance approach to any kind of assault, harassment or discrimination, and any complaint is investigated and acted upon without regard to seniority length of service or favouritism.</p> <p>The report explains the Greenpeace Integrity System and refers to a model Protocol on Handling Integrity Violations which includes reporting, investigations and sanctions. Again, we would have liked to see a link to the protocol, or an explanation of the processes mentioned.</p> <p>There is also information about the Restoring Justice initiative which intends to meet the needs of those who have experienced sexual harassment while working at Greenpeace. A dedicated taskforce from GPI can provide investigation and process support to NROs which need it. Complaints processes are addressed further under questions J3 and J4.</p> <p>Overall, Greenpeace's approach appears to be sound. Some examples illustrating how the mentioned processes work in practice, or and trends challenges or learnings on these issues, would further strengthen the response in future reports.</p>	
<p>I. Resources are handled effectively for the public good</p>		
<p>11</p>	<p>Resources are acquired in line with your values, globally accepted standards and without compromising independence</p> <p>The report (pg. 34) states that Greenpeace has and will never solicit or accept money from governments, corporations, political parties or supranational governmental bodies – this is a global policy.</p> <p>Greenpeace is funded by individual donations and grants from foundations, and does not accept donations that could compromise the organisation's independence, aims, or integrity. Is there a particular process or set of questions to determine whether donations will/won't be accepted? Does Greenpeace vet donors contributing over a certain amount? Fundraising is also done in accordance with national laws and codes of conducts.</p> <p>The IRP would be interested to know what processes are in place to ensure compliance with these policies at national level (which provide 95 percent of the organisation's overall funding).</p>	<p>2</p>
<p>12</p>	<p>Monitoring of progress and re-allocation of resources</p> <p>Greenpeace notes the importance of being able to act and respond in moments of crisis or other disruptions. They maintain a focus on big picture objectives (rather than a linear strategy) so that they have the ability to</p>	<p>2</p>



	<p>react quickly when needed. This includes responding to a disruption that has already emerged, catalysing a disruption that is developing, or helping foster disruptive actions.</p> <p>The report explains how Greenpeace is working on measuring progress and impact. This is challenging because of the ambitious goals the organisation has and the different types of outcomes to be tracked (long-term social and cultural change versus specific environmental outcomes).</p> <p>Whilst acknowledging these difficulties, the Panel believes Greenpeace could share more concrete information on how it is currently tracking progress, how regularly this is reviewed and by whom, and what the process of responding to changing or emerging priorities looks like. What processes are in place for shifting funding and/or staffing from one programme, campaign, or region to another and how quickly is Greenpeace able to respond? An example of how Greenpeace has responded to a disruption would be welcome in the next report.</p>	
13	<p><i>Minimising risk of corruption, bribery and misuse of funds</i></p> <p>Greenpeace sees corruption as one of the drivers of environmental and human rights abuses, and therefore strives to ensure it does not support the systems that perpetuate it. The GPI Integrity System include policies on Avoiding Corruption, Financial Responsibility, and Impartiality and Conflict of Interests. The Panel strongly encourages Greenpeace to make these policies available online and provide links in future reports, as it is difficult to know what measures are actually in place. For example, is there a finance and risk committee or a risk register in place, or is there a multi-level process for signing off on payments? Do staff receive training on these issues?</p> <p>A Model Protocol for Handling Suspected Integrity Violations guides investigations into suspected breaches of the policies. The relevant document also was not linked, but pg. 30 of the report provides some more information.</p> <p>The report states that not all NROs have fully implemented the policies yet, but the intent is to create a common system and understanding of acceptable behaviour across the movement.</p> <p>In terms of relevant cases reported in the year, the report provides an overview of all complaints received (50 in 2017 and 96 in 2018) and upheld, (48 in 2017 and 71 in 2018) but does not specify how many of the complaints related to financial misconduct. The Panel appreciates that</p>	2



	<p>this is the first year Greenpeace is releasing data on complaints, and encourages a more detailed overview of the categories in future reports.</p>	
<p>J. Governance processes maximise accountability</p>		
J1	<p>Governance structure and recruitment of trustees/board members</p> <p>Information is provided about Greenpeace's structure, including Greenpeace International and the National and Regional Organisations. More detail is available on the website and the report also explains how different parts of the global network interact.</p> <p>Here we would want to see more information about the roles of the GPI and NRO Boards, the GPI Council, and any board or other committees that may exist. The majority of this information, and a list of GPI Board members, is available on Greenpeace's website, and a link to this page in future reports would suffice.</p> <p>The report states that Board members are not paid a salary, but do receive compensation for time spent on activities undertaken in their role. The report includes the figures for these compensation payments for 2017 and 2018. With regards to this, the IRP would welcome details as to how the non-expense reimbursement portion of board member remuneration is calculated (i.e. remuneration for time contributed).</p> <p>There is a brief section in the report on replacing and recruiting new board members, which refers to globally agreed governance principles and guidelines. There is reference to a separation of roles of key constituencies, and criteria for avoiding conflicts of interest to ensure the independence of the boards. However, it is not stated exactly how board recruitment works and what factors/targets are taken into consideration, e.g. skill sets, age, gender, geographical representation.</p> <p>The Board is currently composed of four women and two men from a range of countries.</p>	3
J2	<p>Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes</p> <p>The Panel was not able to find information on this point in the report. Greenpeace's Board is, as stated on the website, "responsible for decisions on wide-ranging strategic and high level campaign areas: deciding organisational policy; approving the global programme</p>	1



	<p>planning process; [and] ratifying Annual General Meeting (AGM) decisions".</p> <p>The Panel would like to see some more information, such as how regularly policies and finances are reviewed, whether there are any dedicated committees such as a finance and risk committee, and if/how the Board receives an overview of complaints.</p> <p>This is an area to address in the next interim report.</p>	
J3	<p>Complaints handling mechanisms and overview of complaints (external)</p> <p>The report explains Greenpeace's Integrity System, which seems to be for internal concerns and complainants, and which is addressed under question J4 below.</p> <p>In terms of external stakeholders, the report states that NROs have been able to receive complaints through multiple channels, but that there is no formal complaints framework. Greenpeace is currently developing an External Complaints Policy, which is expected to be rolled out in 2019. This is identified in the report as an opportunity for improvement, and the Panel echoes this, as it has been an issue we have consistently raised for the past several years.</p> <p>Given it is September 2019 at the time of the Panel's review of this report, we would like to know when exactly the policy will be finalised, implemented, and communicated, including on Greenpeace's website.</p> <p>This is an issue to focus on in Greenpeace's next interim report, and we also request an update in Greenpeace's response letter to the Panel on this report.</p> <p>In subsequent reports, we would like to know how complaints are responded to, if/how they are monitored centrally, what key issues have been raised in the year, and how Greenpeace is responding.</p> <p>Finally, while the report provides the number of complaints received, investigated and upheld, the Panel understands that these figures relate to internal complaints. Can Greenpeace provide an overview of the number and nature of concerns raised by external complainants in future reports?</p>	1



J4	<p>Complaints handling mechanisms and overview of complaints (internal)</p> <p>Greenpeace International has an Integrity Model, which forms the basis for NROs' own integrity systems, which are adapted to national contexts. Greenpeace's integrity system is based on the model Code of Conduct, Preventing Harassment and Sexual Harassment policy, and Anti-Discrimination Policy.</p> <p>The process for reporting and dealing with concerns is outlined in the Protocol on Handling Integrity Violations. Integrity Officers at both GPI and national offices are responsible for ensuring policies are developed, known, and implemented, and for investigating violations. There are also Persons of Trust whom staff can confide in. The report also refers to a whistleblower procedure, and mentions that reports go directly to the Board.</p> <p>As there were no links provided to any of the mentioned policy documents, we are not able to provide feedback on the actual processes. The Panel would like to know how people can submit complaints (via email, online form, phone, etc.) and the procedure and timeline for investigations.</p> <p>The report provides figures for the number of complaints received, investigated and upheld in 2017 and 2018 across the Greenpeace network. Of 146 complaints over the two years, 97 were related to harassment, sexual harassment, or bullying. In future reports can Greenpeace share what the other complaints related to?</p> <p>The report states that of the cases upheld, disciplinary action led to 46 people leaving Greenpeace, and the other matters were dealt with through training, mediation or formal warning. Have there been any lessons learned or changes made to any internal processes as a result of these cases? For example, has there been increased training around harassment and bullying?</p>	2
J5	<p>Protecting confidentiality and anonymity of those involved in complaints</p> <p>GPI's Integrity Unit seeks to balance the need for confidentiality and transparency during and after investigations into complaints. Confidentiality is seen as a right and an obligation for all parties involved, and as vital for the creation of a safe space in which people feel comfortable raising concerns.</p>	3



	<p>The report states that people have the right to report concerns anonymously, but that this can make it more difficult to take action. Staff can make anonymous submissions to the Integrity Officer, and the whistleblower procedure also allows anonymous reporting directly to the Board. How does this work in practice – is there a submission form, or would those submitting concerns be expected to create an anonymous/fake email address?</p>	
<p>K. Leadership is dedicated to fulfilling the 12 Commitments</p>		
K1	<p><i>The governing body and management are held accountable for fulfilling strategic promises</i></p> <p>The report states that the GPI Board is responsible for overseeing the International Executive Directors and ensuring that they implement Council and Board decisions. In future reports we would like to see more information on how the Board assesses the performance of the IEDs. Is there an annual performance review, and who is involved in the process? Is there particular attention paid to strategic goals and issues related to accountability?</p> <p>The report also doesn't include information on how the Board itself is assessed. This information is requested in the next full report.</p>	2
K2	<p><i>Inclusion of staff in discussing progress toward organisational accountability</i></p> <p>In 2018, issue experts at Greenpeace International were consulted in a participatory process to gather content for the accountability report. This was used as an opportunity to discuss both progress towards the accountability commitments, as well as to identify gaps. It is also stated that the report was changed after feedback from senior GPI leadership. Were other staff also included in the preparation of the report? Is the finalised report – and the Panel's feedback – shared and discussed with staff?</p> <p>In future reports, can Greenpeace provide information on how staff are involved in accountability discussions, apart from the reporting process?</p>	2
K3	<p><i>Scope of this accountability report and influence over national entities</i></p> <p>The report covers the entire Greenpeace global network, including GPI and the NROs. All members of the network are mutually accountable to one another, and the NROs have adopted similar forms of organisation. The report lists a number of commitments and processes which guidance</p>	4



	accountability throughout the network and the Panel notes positively the focus on peer to peer support, learning, and sharing of skills and experiences.	
--	----------------------------------------------------------------------------------------------------------------------------------------------------------	--