

# Feedback from the Independent Review Panel

Review Round June 2016

27 June 2016

Dear Danny Sriskandarajah,

Many thanks for submitting your INGO Accountability Charter report. In times of conflict and climate change, when civil society organisations (CSOs) have an increasingly important role to play, the space for civil society is shrinking in many parts of the world. Strong accountability and the demonstration that we “walk our talk” have never been more important. It is also against this background that the Charter has initiated an alliance with eight national CSO accountability frameworks to strengthen our collective voice as we devise a shared [Global Standard for CSO Accountability](#).

Before providing you with an individual assessment of your report, there were some issues that arose in all or many reports that the Independent Review Panel wants to share with you:

## Getting fit for the digital age

Digitisation allows for unprecedented connectivity. At a time when citizens have increased levels of agency and literacy this is a game changer in the way CSOs work. Mobilisation and relationship building with large numbers of people to *co-create* the change they want to see is at the heart of most new CSO strategies – particularly in campaigning. Working *with*, not *for* stakeholders, is not just seen as the right thing to do, but also as the most impactful.

Important in this evolution is moving ICSOs from transparency to actively sharing information, from consultation to joint decision making and from taking responsibility for others to sharing mutually defined responsibilities.

The Charter has initiated the [Digital Accountability project](#) and Amnesty International, Greenpeace, Oxfam, Transparency International and others are already intensively involved in this project. We look forward to more cooperation with and among Member organisations on this particular issue and for these issues to be addressed more in future reports.

## Globalisation / National level accountability

Decentralisation processes usually place more responsibility and capacity at the national level. To ensure an ICSO presents a unified, coherent voice and can protect its brand, a strong and globally shared understanding of mutual accountability is key. Thus, decentralisation often goes hand in hand with a stronger mandate for the ICSOs’ global accountability mechanisms. These should help national entities build capacity in the accountability practice, and also demand stronger delivery on global commitments. Charter Members are encouraged to ensure that all their entities adhere at least to the following minimum standards: transparency, effective and independent oversight, involving people we serve, coordination with partners, sound financial management and impact focus.

## Inclusion and diversity

Many Charter Members still focus mainly on gender when demonstrating their accountability in terms of diversity. This is a lost opportunity. As we all know, there is also discrimination on the basis of disability, age, ethnicity, etc. Actively reaching out to these constituencies will strengthen their rights and their participation. For example, positive action can increase the employment of those with disabilities or from minority ethnic groups. Such inclusion is central to a human rights based approach, but may also improve results by tapping into a wider

base of experience. For further advice, click [here](#) on the outcome of a Charter webinar on inclusion or [here](#) to look at some good practice examples of Charter Members.

Please ensure that all points listed above are taken into consideration when further developing your accountability practices in the coming months and collecting data for the next INGO Accountability Charter report.

### Organisation-specific feedback to CIVICUS

CIVICUS' seventh accountability report is regarded as overall very good and comprehensive. People can only hold an organisation to account, if a commitment to accountability is prominently visible. In this regard, it is highly appreciated that CIVICUS has a sub-page on accountability where it refers to the INGO Accountability Charter, prominently places the **Charter logo** and links to CIVICUS' reports on the Charter website ([here](#)). This is seen as a contribution to strong external **institutional commitment** to accountability.

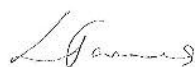
The organisation followed up on previous Panel feedback such as strengthening how accountability drives meaningful stakeholder engagement, more details on Board election procedures and term limits, prioritisation of stakeholders, ongoing development of a Feedback and Complaints Handling Mechanism and an Environmental Management Policy. However, the Panel had previously asked for more **evidence** that processes and policies work well in practice and in particular if membership procedures / approval have been reviewed. These remain areas for more clarification. In addition, CIVICUS still provides only very few links which are often not working (e.g. Staff Handbook or Resource Mobilisation Policy).

Other **weaknesses** include the outstanding but mandatory feedback and complaints handling policy (NGO2) which is currently being developed and would also be the basis to move to biannual reporting in the future; other diversity dimensions in CIVICUS projects beyond gender and youth integration (NGO4); diversity of the Board of Directors (LA13); and insufficient information on CIVICUS' systematic risk analysis on potential corruption exposures as well as on their Fraud Prevention Policy and to the Information Privacy Policy (SO3). These areas for future progress are summarised in the Panel's **Improvement Analysis**. CIVICUS is asked to prioritise the areas the Panel has identified.

Our intention is that this letter, and any response you may wish to provide, is made publicly available on the Charter website along with your report. You can find the reports that were previously reviewed on our [website](#). However, should there be errors of fact in the feedback above or in the note below; we would of course wish to correct these before publication. Please share these comments or amendments by 29 July 2016.

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

Yours sincerely,



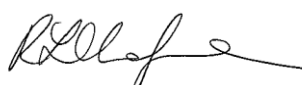
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# CIVICUS

Review Round June 2016

Cover Note on Accountability Report 2014-2015

<b>PROFILE DISCLOSURES</b>	
<b>I. Strategy and Analysis</b>	
1.1	<p><b>Statement from the most senior decision-maker</b>  <i>Fully addressed</i></p> <p>The opening statement by CIVICUS' Secretary General, Dhananjayan Sriskandarajah, shows strong commitment to accountability being used as a collective response to shrinking civil space. He promotes "a lived commitment to open, transparent and accountability institutions".</p> <p>Accountability helps CIVICUS to engage key stakeholders, i.e. their members, in meaningful co-creation processes that drive better, long term results, and useful examples are provided.</p>
<b>II. Organisational Profile</b>	
2.1 – 2.2	<p><b>Name of organisation / Primary activities</b>  <i>Fully addressed</i></p>
2.3	<p><b>Operational structure including national offices</b>  <i>Fully addressed</i></p> <p>The answer provides relevant information relating to the operational structure of the CIVICUS secretariat only. The organisational chart in Annex I is very helpful (page 40). The Panel looks forward to updates on the growth strategy, global induction programme and a stronger move towards globalisation in the next full report.</p>
2.4 – 2.6	<p><b>Headquarter location / Number of countries / Nature of ownership</b>  <i>Fully addressed</i></p>
2.7	<p><b>Target audience</b>  <i>Fully addressed</i></p> <p>General information about the target audience and affected stakeholders is given: CSOs and citizens around the globe while also working with governments and the private sector. A list with all voting members was provided in the 2013-2014 report.</p>
2.8	<p><b>Scale of organisation</b>  <i>Fully addressed</i></p> <p>The answer provides a comprehensive picture of the organisation's overall scale. CIVICUS can be commended for immensely increasing its income for the second year in a row (by 81% in 2014 and by 38% in 2015) which is due to planned proposal building in the past.</p>
2.9	<p><b>Significant changes</b></p>

	<p><i>Fully addressed</i></p> <p>CIVICUS mentions that the “significant increase in income” allows to increase its staff complement in 2016.</p>
2.10	<p><b>Awards received</b></p> <p><i>Fully addressed</i></p>
<b>III. Report Parameters</b>	
3.1 – 3.4	<p><b>Reporting period / Date of most recent report / Reporting Cycle / Contact person</b></p> <p><i>Fully addressed</i></p> <p>However, the most recent report was assessed in June 2015 (not in October 2015).</p>
3.5	<p><b>Reporting process</b></p> <p><i>Partially addressed</i></p> <p>It is appreciated that staff members regularly update other colleagues on Charter developments so that staff is generally very aware of accountability issues and the Charter.</p> <p>While it is understood that it requires some resources to create the Charter report and a “cross-sectional specific reporting intervention” is not feasible, the Panel encourages CIVICUS to demonstrate more clearly, <i>how</i> the report is compiled, i.e. who in the team is responsible for which parts – in regard to aggregating the data but also to ensuring afterwards that Panel feedback is disseminated to the relevant colleagues / people. What have you learnt from this process?</p> <p>Wide dissemination of the report is important to ensure stakeholders know what CIVICUS commits to and how it has progressed against these commitments. The example of <a href="#">Educo’s executive summary of their 2014 report</a> offers a more user-friendly report summary, which may be of interest.</p>
3.6	<p><b>Report boundary</b></p> <p><i>Fully addressed</i></p> <p>CIVICUS states that the report only covers the secretariat and does <i>not</i> report on any activities of organisations or partners who may be CIVICUS members and part of the CIVICUS alliance.</p>
3.7	<p><b>Specific limitations</b></p> <p><i>Fully addressed</i></p> <p>The Panel acknowledges the challenges to produce this report with limited financial and HR resources and commends CIVICUS for having improved the quality and availability of data for this report (the internal management dashboard was provided in the 2013-2014 report).</p>
3.8	<p><b>Basis for reporting</b></p> <p><i>Fully addressed</i></p> <p>In addition to the boundaries mentioned in 3.6, CIVICUS cannot ensure if consultants adhere to the Charter’s accountability commitments.</p>
3.10 – 3.12	<p><b>Changes in reporting parameters / Reference table</b></p>

	<i>Fully addressed</i>
<b>IV. Mission, Values, Governance, and Stakeholder Engagement</b>	
4.1	<p><b>Governance structure</b> <i>Fully addressed</i></p> <p>A valuable overview of the governance structure including different Board committees is provided. As a follow up from previous Panel feedback, CIVICUS openly shares that its active ‘working’ Board sometimes proves challenging for Board members in relation to balancing this commitment with their regular roles (e.g. CEOs of CIVICUS members). Investment in Board development is envisaged to tackle this challenge. This openness is highly appreciated.</p> <p>Moreover, CIVICUS provides comprehensive insights on its solid risk management in place.</p>
4.2	<p><b>Division of power between the governance body and management</b> <i>Addressed</i></p> <p>The Panel would welcome more information if the Board of Directors evaluates CIVICUS’ Secretary General and how it is ensured that both bodies optimally support each other.</p>
4.3	<p><b>Independence of Board Directors</b> <i>Fully addressed</i></p> <p>The Secretary General is an ex-officio Board member and the only person paid on the Board. All other 14 Board Directors are unpaid volunteers.</p>
4.4	<p><b>Feedback from internal stakeholders</b> <i>Addressed</i></p> <p>CIVICUS provides an interesting overview of the different ways that members and employees can provide recommendations to the Board – e.g. the Annual General Meeting (conducted virtually since 2014 to ensure participation from around the world), scheduled staff-Board interactions, regular Committees meetings, internal reviews, and the Annual Constituency Survey (ACS). While these are commendable processes, the Panel would appreciate evidence that this engagement is indeed meaningful, truly two-way and that it has led to changes in the decision-making (e.g. examples from ACS evaluation and how this was <i>actually</i> reflected in the annual operational plans).</p>
4.5	<p><b>Compensation for members of highest governance body</b> <i>Fully addressed</i></p> <p>CIVICUS provides no financial compensation for their Board Directors. Executives’ salaries are confidential but are based on the Paterson Scale (remuneration data available in South Africa).</p>
4.6	<p><b>Conflicts of interests</b> <i>Fully addressed</i></p>
4.10	<p><b>Process to support highest governance body’s own performance</b> <i>Fully addressed</i></p> <p>The first self-evaluation pilot study was reviewed at the Board meeting in November 2015. Results will be presented in the next full report and the Panel</p>

	looks forward to see how this drives internal effectiveness. It is already interesting to know that the self-evaluation is used to decide on the skill set needed when electing the next Board in 2016. Moreover, relevant information is provided on procedures for the appointment, term limits and skill sets of Board members.
4.12	<b><i>Social charters, principles or other initiatives to which the organisation subscribes</i></b> <i>Fully addressed</i>
4.14	<b><i>List of stakeholders</i></b> <i>Addressed</i>
4.15	<b><i>Basis for identification of stakeholders</i></b> <i>Fully addressed</i> A list of stakeholders and partnerships is provided. The Panel commends CIVICUS for their <a href="#">membership policy</a> which has also been “very effective in strengthening CIVICUS’ engagement with non-civil society stakeholders”. While CIVICUS members receive priority in terms of partnership opportunities, CIVICUS sometimes needs to partner with other actors if required by context or expertise in certain area.  CIVICUS is asked to look into their criteria for membership approval as outlined in more detail in the Panel’s last Feedback Letter.

## PERFORMANCE INDICATORS

### I. Programme Effectiveness

NGO1	<b><i>Involvement of affected stakeholder groups</i></b> <i>Fully addressed</i> CIVICUS defines their own membership as the primarily affected stakeholders and provides again valuable and concrete examples of their involvement in key decision-making processes (Strategy and Leadership Survey from 2012, Annual Constituency Survey, Membership Survey etc.) and in flagship publications or projects (e.g. Civil Society Index, Civic Space Initiative or DataShift). Partners did not only provide input but co-created these projects which is much appreciated. Nevertheless, the Panel asks again for more concrete <i>evidence</i> how these processes have positively affected the decision-making or reshaped CIVICUS’ procedures.
NGO2	<b><i>Mechanisms for feedback and complaints</i></b> <i>Partially addressed</i> The Panel appreciates that CIVICUS has got a well-established practice of receiving and dealing with feedback and complaints which is also part of quarterly or biannual performance reports of all projects and departments. It is positively noted that results from the Annual Constituency Survey are published in CIVICUS’ Annual Report.  However, there is still no formal feedback and complaints handling mechanism in place which is <i>mandatory</i> for all Charter Members (see <a href="#">membership criteria</a> ). A formal policy and well evidenced practice on this indicator is also the basis to be



	<p>allowed for the biannual reporting cycle for Charter reports. CIVICUS states that complaints logging mechanism will be introduced as part of their new CRM by end-June 2016. Moreover, a Feedback and Complaints Handling Policy is currently developed and shall be published by 01 July 2016. The Panel will closely track developments in this area, in particular:</p> <ol style="list-style-type: none"> <li>1. How does CIVICUS actively invite feedback of a significant multitude of stakeholders to co-create activities – is it e.g. published on their website?</li> <li>2. What is the formal process in which any feedback/complaint can be given (e.g. via email address on website?), is processed, attended to, and resolved where necessary?</li> <li>3. How does CIVICUS ensure aggregated feedback is meaningfully fed into decision-making?</li> </ol>
NGO3	<p><b><i>Programme monitoring, evaluation and learning</i></b> <i>Addressed</i></p> <p>A recent study conducted by the direct impact group has shown that monitoring, evaluation and learning (ME+L) is still a comparably weak area for CSOs. CIVICUS lists numerous internal assessments in the reporting period and the Panel appreciates that e.g. the data disclaimer policy was benchmarked against Charter standards. Some of these evaluations are published online. Concrete <i>evidence</i> how these changes have led to significant management response will be appreciated in the next report. The Organisational Dashboard (Annex III of the report), which measures progress of key indicators of the organisation, is positively noted but would benefit from also showing progress against CIVICUS’ strategic priorities (page 6).</p> <p>Overall, the Panel asks again to hyperlink policies and evaluations that are of interest for the general public.</p>
NGO4	<p><b><i>Gender and diversity</i></b> <i>Partially addressed</i></p> <p>The Panel supports CIVICUS’ view to improve the organisation’s mainstreaming of gender and diversity efforts throughout its programmes. In this regard, the new <a href="#">Gender Working Group</a> is highly appreciated and the Panel looks forward how this group will “re-introduce gender and diversity issues into CIVICUS as an explicit theme”. Has CIVICUS set itself any targets in this regard? Could CIVICUS link to the Gender and Diversity Scorecard mentioned in the previous report? Moreover, it would be interesting to know <i>how</i> the Youth Advisory Group ensures that the voices of young people are heard and echoed throughout CIVICUS.</p> <p>However, it is overall not clear what CIVICUS does to drive overall inclusion in their work beyond gender and youth. The Panel suggests implementing systems to identify stakeholders that are potentially excluded from CIVICUS’ work due to e.g. disability, ethnicity, poverty, or illiteracy. In addition, a link should also be provided to CIVICUS’ gender and diversity policy (mentioned in NGO5) along with evidence that this policy works well in practice.</p>
NGO5	<p><b><i>Advocacy positions and public awareness campaigns</i></b> <i>Fully addressed</i></p> <p>CIVICUS can be again commended for rigorous procedures in place to ensure thorough evidence base of the organisation’s advocacy positions – e.g.</p>

	<p>meaningful stakeholder consultation and partner feedback (also locally / from the ground), research, situation analyses, management monitoring, bi-annual reporting processes, publications, and corrective adjustments after external criticism. All positions taken are grounded in CIVICUS' five values and in their gender and diversity policy. Are there examples for corrective actions or for exiting a campaign? Are there examples for mentioned criticism received from external stakeholders?</p>
NGO6	<p><b>Coordination with other actors</b> <i>Fully addressed</i></p> <p>It is positively noted that CIVICUS believes to be stronger when working with others together towards the same goal while at the same time ensuring not to compete with or displace their local partners. CIVICUS regards themselves as a network and knowledge broker, also bringing local concerns to a global level. In this regard, it would be particularly interesting to learn more about how CIVICUS handles differences and power dynamics among their membership.</p> <p>They have established sound criteria in place for the selection of their partners. However, the Panel would be interested if these criteria also ensure that CIVICUS' strong accountability commitments with the Charter are also ensured at the partner level. Moreover, is there an overarching written policy in place?</p> <p>Together with the International Civil Society Centre, they have authored the so-called <a href="#">Partnership Principles</a> for cooperation between local, national and international CSOs. The Panel looks forward to seeing how CIVICUS will take these principles further and amend their own partnership model by end-2016. By this process, CIVICUS will hopefully be able to also provide <i>evidence</i> that the effectiveness of partnerships is evaluated and works well in practice.</p>
<b>II. Financial Management</b>	
NGO7	<p><b>Resource allocation</b> <i>Addressed</i></p> <p>The report outlines a robust resource allocation and tracking system with multiple policies and standards in place as well as how these processes ensure achieving key strategic objectives. However, in the next full report, please provide a link to CIVICUS' most recently externally audited financial figures (the link on page 12 does not work).</p>
NGO8	<p><b>Sources of Funding</b> <i>Fully addressed</i></p> <p>The Panel would like to flag the fact that CIVICUS seems to be heavily dependent on Sida. Is there a risk management strategy in case these Sida funds would no longer be available?</p>
<b>III. Environmental Management</b>	
EN16	<p><b>Greenhouse gas emissions of operations</b> <i>Addressed</i></p> <p>The Panel assumes that this indicator applies to the international secretariat only. Please clarify in the next report. CIVICUS provides information on its greenhouse gas emissions (526.2 metric tonnes in 2014/2015) which is a tremendous increase from 200.9 metric tonnes in 2013/2014. Travel has again increased in</p>



	<p>the reporting period when compared to the previous reporting timeframe but it is not clear if this is the main cause for the large increase. It would be good to provide more explanation here.</p> <p>It is appreciated that the organisation is working to improve their methods. For the next report, the Panel welcomes an overview of carbon footprint development <i>over years</i> in a way that allows seeing developments more easily (e.g. via table format).</p>
EN18	<p><b><i>Initiatives to reduce emissions of operations</i></b> <i>Addressed</i></p> <p>It is very much appreciated that CIVICUS has drafted an Environmental Management Policy which will be further amended by a participatory process in order to emerge organically. The Panel looks forward to more details of (reduction targets, monitoring system, management support, responsibility levels etc.) and a link to this policy in the respective report.</p> <p>In the meantime, what initiatives does CIVICUS follow to reduce emissions – in particular having in mind the large increase in the last reporting period? While it is understood that CIVICUS’ work will always necessitate international travel (leading to CO<sub>2</sub> emissions) to fulfil the organisation’s mission, it is appreciated that the organisation thinks about possibilities to reduce the relative output of CO<sub>2</sub>.</p>
EN26	<p><b><i>Initiatives to mitigate environmental impact of activities and services</i></b> <i>Addressed</i></p> <p>CIVICUS does not conduct any environmental assessments for its projects. However, clear guidelines will be developed for CIVICUS’ largest areas of environmental impact (i.e. travel and events) as part of the mentioned participatory process for the new policy.</p>
<b>IV. Human Resource Management</b>	
LA1	<p><b><i>Size and composition of workforce</i></b> <i>Addressed</i></p> <p>The answer provides relevant information on CIVICUS relatively flat HR structure, full-time employees and volunteers / interns. There is a steady increase of employees throughout the year as well as a slight majority of female over male staff and non-RSA residents (mostly North Americans and Europeans) over RSA residents. However, more information on the different responsibility levels would be welcome for the next report. Comparisons over years would further strengthen this answer.</p> <p>Finally, LA1 lists 7 interns in the reporting period while 2.8 (page 11) lists 10 and EC7 lists 8 interns (page 33).</p>
EC7	<p><b><i>Procedure for local hiring</i></b> <i>Fully addressed</i></p> <p>The international secretariat represents a broad diversity regarding citizenship (see LA1) and CIVICUS describes their thoughtful recruitment processes. A link to the recruitment policy mentioned in the previous report would be welcome in the future.</p> <p>CIVICUS’ open challenges in regard to local hiring are greatly appreciated and the</p>

	<p>Panel supports their intention to collaborate closer with universities and hiring local candidates at more junior level to build them up and train. The direction and intent of this approach can be applauded and it will now be interesting to see first results and measured success. The Panel looks forward to being updated on progress on building capacities in the Global South.</p>
LA10	<p><b>Workforce training</b> <i>Addressed</i></p> <p>CIVICUS provides information on training hours and a variety of trainings and development programmes used by staff in the reporting period. It would be interesting to know how these training needs are actually identified (i.e. what qualifies as training) apart from feedback gathered from workshop feedback forms or from the performance reviews (see LA12). Is there evidence that training is successful?</p> <p>Finally, the Panel would welcome information on how much CIVICUS invests as percentage of the overall administrative budget into training their workforce.</p>
LA12	<p><b>Global talent management</b> <i>Fully addressed</i></p> <p>CIVICUS is commended for conducting quarterly performance reviews with <i>all</i> staff. Concrete examples of how feedback from the reviews has shaped the Nine Box Performance and Potential Grid will be appreciated in the next report. Does this approach follow an overall management development plan for the entire organisation to meet key strategic priorities?</p>
LA13	<p><b>Diversity of workforce and governance bodies</b> <i>Partially addressed</i></p> <p>CIVICUS presents the composition of their workforce and Board according to age and gender. However, actual figures for Board Members are missing, i.e. the table remains empty for this category. Please clarify the diversity of CIVICUS' Board in future reports. Moreover, which other groups might be excluded in the workforce and governance body (e.g. religious minority groups, people with disabilities etc.)?</p>
NGO9	<p><b>Mechanisms to raise grievances</b> <i>Addressed</i></p> <p>The report states that no grievances have occurred in the reporting period. CIVICUS has three ways to raise grievances as outlined in the Staff Handbook: discussion with immediate supervisor, grievance investigation by the COO, and Secretary General discussion. Grievances should be resolved at the lowest possible level.</p>
<p><b>V. Responsible Management of Impacts on Society</b></p>	
SO1	<p><b>Managing your impact on local communities</b> <i>Fully addressed</i></p> <p>As in the previous year, CIVICUS states that their work and influence is often done indirectly through members or partners and that it is therefore challenging to measure the organisation's impact on local communities. Nevertheless, their Impact Planning and Learning Framework (IPLF) and new projects and proposal development guidelines ensure to assess and manage the operations' impacts including entering, operating and exiting. The Panel encourages CIVICUS again to link to these mentioned documents and provide information on any feedback</p>

	received from communities in the next report.
SO3	<p><b><i>Anti-corruption practices</i></b>  <i>Partially addressed</i></p> <p>CIVICUS states in SO4 that they are informed by their external auditors annually on the latest fraud and corruption schemes as well as by their bankers on phishing schemes etc. Does this equal a systematic risk analysis on where CIVICUS' work might be exposed to corruption, bribery, nepotism, fraud or conflict of interest? CIVICUS is advised to look also internally at potential bad practices as corruption is an external and internal threat.</p> <p>Unfortunately, the link to the Staff Handbook does not work so that CIVICUS is again asked to directly link to the Fraud Prevention Policy and to the Information Privacy Policy. Evidence that these policies are known by staff and work in practice is also welcome in the next report.</p>
SO4	<p><b><i>Actions taken in response of corruption incidents</i></b>  <i>Addressed</i></p> <p>CIVICUS states that no corruption incidents were reported in 2014/2015 and outlines different activities to prevent corruption and fraud (e.g. external auditors as independent fraud and corruption hotline for management, partner checklist, technologies to prevent cyber-attacks on data). Overall though, more information on <i>general procedures</i> and <i>potential publication</i> of any incidents once they appear would appreciated in the next report.</p>
<b>VI. Ethical Fundraising</b>	
PR6	<p><b><i>Ethical fundraising and marketing communications</i></b>  <i>Fully addressed</i></p> <p>CIVICUS has got several procedures in place to ensure that their fundraising and marketing activities are in line with the organisation's five basic principles, South African law and the Universal Declaration of Human Rights. This also includes a Resource Mobilisation Policy in place reflecting Ethical Fundraising Guidelines and the Charter. Unfortunately, the link to this policy does not work and more details will be appreciated in the next report. CIVICUS states that they have not received any complaints for breaches of fundraising or marketing during the reporting period. Will the new Feedback and Complaints Handling Policy also include processes for this specific area?</p>