

Feedback from the Independent Review Panel Review Round March 2015

Berlin, 08 April 2015

Dear Adriano Campolina,

Many thanks for submitting your accountability report to the INGO Accountability Charter. Before providing specific feedback on your organisation's report, let us highlight three areas of general concern that occurred in most of the reports submitted for the recent fall and this spring review round:

1.) **Be clear on why accountability is important for your organisation**

For Charter reports to be meaningful, it is important to start with a clear description of the organisation's *specific* understanding of accountability and how this shapes strategic decision-making and operations in regard to governance, finance, programme, fundraising, campaigning, HR etc. Be clear about whom you are most accountable to and how communication with them improves achieving your strategic goals. Find [here](#) on our website the Charter's currently used definition. Throughout the report, let us know how you use accountability to continuously add value to your organisation.

2.) **Moving from "GAP Analysis Table" to "Improvement Analysis"**

It is the key aim of the INGO Accountability Charter to support continuous organisational improvements. Against this background the GAP Analysis Table was introduced to showcase at a glance where progress has been achieved and which areas need to be further addressed. We observed that this worked quite well for some, but not for all organisations. One difficulty being that it became overloaded with information without differentiating important and much less important issues. We therefore suggest that organisations for which this instrument has worked well, keep it as a very good internal document to follow up on progress. For the purpose of the reporting and vetting exercise, however, we suggest having a much more succinct "Improvement Analysis", capturing only the most relevant issues that need to be addressed. The Panel has tried to summarise these areas for your organisation at the end of this Feedback Letter. If this does not reflect your own priorities, please let us know. The "Improvement Analysis" is also considered to be the basis for the very brief interim reports of those organisations moving to biannual reporting.

3.) **Level of Evidence**

Our sector is often criticised for having very good intentional language, but few facts and figures to prove its claims. It is against this background that the Panel asks for compliance to be proven on three levels: (i) having a written policy, (ii) providing evidence that the policy is known and applied by staff and (iii) assurance that it leads to positive management response and helps improving effectiveness in achieving your organisation's goals. While much progress has been made at the policy level, evidence for application in practice and better impact is still relatively low. While we do acknowledge that it is not an easy task to provide this evidence for very large, international organisations, we have also seen some very good attempts. Some examples include: (a) reporting the percentage of national entities which comply with certain standards, (b) leveraging existing surveys that provide relevant hard data, (c)

through globally set parameters, evidenced by random national level controls or d) illustrative case studies.

Please ensure that all the three points listed above are taken into consideration when collecting data for the next INGO Charter report.

Organisation-specific feedback to ActionAid International

ActionAid International's seventh accountability report is overall regarded as very good and comprehensive. Previous Panel feedback has been taken on board and this report demonstrates continuous and impressive progress and improvements of ActionAid's reporting over the last years. Overall, the report shows how seriously AAI takes the preparation of the report and use of feedback from the Independent Review Panel.

The report demonstrates a strongly-embedded **institutional commitment** to accountability constituting an integral part of the organisation's Theory of Change and reflected in the approval of [AAI's Accountability Charter](#) in 2013. While ActionAid used to see accountability predominantly through the lens of the people it serves, it has decided to broaden its scope to acknowledge their multiple and sometimes conflicting accountabilities (while reaffirming their commitment to be primarily accountable to the poor).

The following answers are seen as **Good Practice** for other CSOs: The strong CEO statement articulating the linkage of ActionAid's Theory of Change, organisational philosophy and accountability (1.1), ActionAid's cross-functional process to define the report content (3.5) as well as the low number of expatriate contracts (43 out of 2,982 staff – EC7).

Weaknesses include insufficient information on diversity within governance, staff and programme cycle (NGO4 & LA13), the sincerity of process and international oversight in regard to the organisation's complaints handling and the high number of complaints received (NGO2), as well as anti-corruption practices and reactions to incidents (SO3 & SO4). Information for some indicators was initially missing but was submitted on request.

It is highly appreciated that ActionAid publishes their accountability reports along with the **Charter logo** on their [sub-website on transparency](#). As far as transparency and accessibility of information is concerned, the Panel would welcome even more hyperlinks to relevant policies and procedures throughout the report.

The organisation is commended for filling in the **GAP Analysis Table** which comprehensively tracks progress made throughout the last years. As explained in the generic part of this feedback letter, the Panel decided to replace the old format of the GAP Analysis Table with a more succinct overview of identified "**Improvement Analysis**". Based on this report's assessment, we have written this for you and you find it attached to this letter. From now on, we will use this format serving as a baseline for you to summarise the most important progress made in these areas and covered in more detail in the full report.

Overall, ActionAid is commended for a very high level of transparency and accountability to its key stakeholders and the Panel suggests **reporting every two years against Charter commitments from now on**. In a very brief **interim report** the Panel would like to see only an updated CEO statement and information on progress highlighted by the Panel in the "Improvement Analysis". You find more information on biannual reporting on page 2 of our [reporting requirements](#)

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 08 May 2015.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read "Louise James".

Louise James

A handwritten signature in black ink, appearing to read "Michael Röskau".

Michael Röskau

A handwritten signature in blue ink, appearing to read "Jane Kiragu".

Jane Kiragu

A handwritten signature in black ink, appearing to read "Rhonda Chapman".

Rhonda Chapman

A handwritten signature in black ink, appearing to read "John Clark".

John Clark

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Saroeun Soeung

**Review Round March 2015
Cover Note on Accountability Report**

ActionAid International

Reporting period: Calendar year 2013

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	<p>Statement from the most senior decision-maker <i>Fully addressed</i></p> <p>The opening statement by the Chief Executive provides a thorough account of what accountability means to the organisation and why it is important for strategic decision-making processes at all levels. It further highlights that accountability is a part of AAI's Theory of Change (see also p. 10) and is the principle of the organisation's human rights based approach to programming. Redefining accountability based on external and internal trends and acknowledging a multitude of accountabilities is commendable as ActionAid demonstrates its aspiration to remain credible.</p> <p>The statement demonstrates a profound institutional commitment triggered by the approval of AAI's Accountability Charter to which all members of the federation have committed to applying principles of transparency, participation and compliance, along with a commitment to respond to complaints.</p> <p>AAI is commended for incorporating five accountability principles into the annual reporting and the annual planning processes in order to insure their practical application. It would be good to know which specific accountability commitments under the Charter are reflected in the internal Accountability Charter and annual reporting. Progress is expected from the Panel to include more accountability principles over time. Addressing all issues raised by the Independent Review Panel from previous reports is a further positive note in the statement and a sign for AAI's strategic commitment to accountability.</p> <p>Overall, the statement is regarded as Good Practice for other CSOs.</p>
II. Organisational Profile	
2.1 – 2.2	<p>Name of organisation / Primary activities / Operational structure including national offices / Headquarter location / Number of countries / Nature of ownership / Target audience <i>Fully addressed</i></p>
2.8	<p>Scale of organisation <i>Addressed</i></p> <p>It is positively noted that the report includes the balance sheet of AAI's 2013 Financial Report and Accounts; however, the answer would have benefited from a short overview of the annual budget, income and expenditure of the organisation. Percentages of full time employees as opposed to the percentage of volunteers can be found in the answer to LA1.</p>

2.9	Significant changes / Awards received <i>Fully addressed</i>
2.10	Awards received <i>Fully addressed</i> ActionAid can be commended for having won two awards from the United Nations.
III. Report Parameters	
3.1 – 3.4	Reporting period / Date of most recent report / Reporting Cycle / Contact person <i>Fully addressed</i>
3.5	Reporting process <i>Fully addressed</i> AAI is commended for providing a detailed and concrete overview of the cross-functional process for defining the report's content. The table on p.15 is seen as Good Practice for other organisations. The organisation is further commended for taking measures to achieve increased involvement from the entire federation in the process of compiling the report and for taking the Independent Review Panel's feedback into account. Finally, the Panel would also be interested to know how ActionAid ensures the report is read by the designated target audience and how it is used internally to promote enhanced transparency and accountability to the organisation as a whole and to other stakeholders.
3.6	Report boundary <i>Fully addressed</i> AAI is commended for the implementation of an accountability section in the 2013 global report to be reported to by all members and countries of the federation. Overall, this is a thorough and engaging answer to this indicator, acknowledging the difficulties to provide information for each GRI indicator for the entire federation, but showing substantial initiative and effort in advancing the organisation's commitment to accountability.
3.7	Specific limitations <i>Fully addressed</i> The Panel supports ActionAid's constant work towards more consistent practical application of the Charter commitments within the federation.
3.8	Basis for reporting <i>n/a</i> ActionAid states that this indicator is not relevant for ActionAid's operations. However, the answer to this indicator should have contained information about the level of information that has been contributed to the report from entities such as joint ventures, subsidiaries etc. Similarly to last year's report, the Panel assumes from the answers to 3.6 and 3.7 that national level information is only provided on an anecdotal basis in this report. Are Charter commitments presented at the national level through the accountability section in the 2013 global report?

3.10 – 3.11	<p>Changes in reporting parameters <i>Fully addressed</i> The Panel appreciates that ActionAid has taken the Panel’s feedback into account to focus more on outcome and impact and less on input and process. Against this background the change in strategy and measurement methods is appreciated.</p>
3.12	<p>Reference table <i>n/a</i></p>
<p>IV. Mission, Values, Governance, and Stakeholder Engagement</p>	
4.1	<p>Governance structure <i>Fully addressed</i> The answer provides again a very good and comprehensively visualised overview of ActionAid International’s governance structure. However, it was not clear whether the International Board and Council comprise just non-executives or whether CEOs from IS or Affiliates can be members. Also there is a discrepancy in data about numbers of the International Board (9 or 11?). AAI Assembly is “made up of representatives from all AAI countries” – does this imply members of the boards of those countries – associates as well as affiliates? The Panel appreciates the positive outcomes of the organisation’s governance model review as well as the critical questions it raised in regard to increasing programmatic impact at the national level. It will be interesting to hear what the longitudinal study in one country will identify in regard to a correlation of internationalisation and increased impact.</p>
4.2	<p>Division of power between the governance body and management <i>Fully addressed</i> ActionAid differentiates the division of power between the governance body and management in a comprehensive manner. Further information if the CEO is supervised and formally evaluated by the Board and how optimal support of each other is ensured is welcome in the next report. ActionAid is commended for regularly conducting reviews of the effectiveness of its governance bodies.</p>
4.3	<p>Independence of Board Directors <i>Fully addressed</i> ActionAid states to have a two-tier structure. The composition of their Board varies between 9 and 11 independent members in 2013.</p>
4.4	<p>Feedback from internal stakeholders <i>Fully addressed</i> ActionAid provides a comprehensive and notable set of processes and examples by which internal stakeholders can provide feedback to the International Board. This is also formalized in the Complaints and Response Mechanism Framework and Policy. Country examples provide evidence for meaningful engagement between internal stakeholders and the highest governance body. Nevertheless, further generic assurance that the mentioned processes have led to positive management response would be welcome in the next report.</p>
4.5	<p>Compensation for members of highest governance body <i>Fully addressed</i></p>

	Neither ActionAid’s Board members nor Assembly members are compensated. A slight inconsistency is, however, that at both international and national level the relevant CEO is the Board Secretary. Moreover, the Panel would be interested to know if senior leadership receives any remuneration from outside and if yes, is this published. Are outgoing managers provided with any benefits?
4.6	Conflicts of interests <i>Fully addressed</i>
4.10	Process to support highest governance body’s own performance <i>Addressed</i> The Panel looks forward to being informed about the implementation of the recommendations from the commendable federation wide governance model review conducted in 2013 by Hauser Centre. Moreover, outcomes from the Board’s self-review would be interesting for the reader of this report. Finally, it would be appreciated to either link to the AAI Governance Manual or to specifically state the length and maximum for term limits also in the report.
4.12	Social charters, principles or other initiatives to which the organisation subscribes <i>Fully addressed</i> ActionAid describes numerous accountability initiatives it closely relates to at the national and global level besides the INGO Charter of Accountability. While it is appreciated that much commitment is put into complying with various very good standards, it would also be interesting to understand how ActionAid ensures this is done in an effective manner. Do you have a clear understanding of the overlaps and gaps between the various code requirements and how to best compile information once to feed it into the various sources? The Charter is working on a Global Standard together with nine well-established CSO accountability networks from Africa, Asia, Australia, North- and South America. Work is closely aligned with the Istanbul Principles and the Core Humanitarian Standard in an endeavour to reduce the multiplicity of reporting requirements. See our website for more information. ActionAid’s independent members are furthermore signatories of their own regional/country initiatives that they find helpful for increasing efficiency and effectiveness of their work locally.
4.14	List of stakeholders <i>Fully addressed</i>
4.15	Basis for identification of stakeholders <i>Fully addressed</i> The answer provides relevant information about several policies and practices on how stakeholders are selected and prioritised. The Panel looks forward to the revision of the Partnership Policy. Overall, the section would profit from being more focused on the criteria for selecting priority stakeholders and on evidence that this works well in practice.
4.16 – 4.17	<i>Moved to NGO1.</i>

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	<p><i>Involvement of affected stakeholder groups</i> <i>Fully addressed</i></p> <p>As in previous years, ActionAid provides a very good description of meaningful stakeholder engagement in strategic planning, budgeting, programming, monitoring and evaluation. Various mechanisms and channels allow for consultation, active participation and decision-making at the local, national and international level. However, ActionAid is asked to provide an accessible link to the Reflection-Action methodology. Several country examples provide good evidence how feedback from stakeholders affected the decision-making process within ActionAid. Finally, the Panel looks forward to the launch of ActionAid's bi-annual stakeholder expectation surveys and potential improvements resulting from this instrument.</p>
NGO2	<p><i>Mechanisms for feedback and complaints</i> <i>Fully addressed</i></p> <p>ActionAid reports that 17 countries have received and registered complaints that are categorised according to source and issue in the annual reporting template. Some figures, particularly ActionAid Italy with 54,000 filed complaints, are very high. ActionAid is commended for providing these figures and for being clearly very open to having its programmes and activities constantly scrutinised through internal and external feedback/complaints in order to develop it further. Since the figure for Italy is so high (and similarly 720 complaints in UK, 395 in Greece) there should be some discussion about the nature of these complaints, why they were so numerous, and what action was taken to address them? Was there an orchestrated campaign against AAI in Italy to explain such high level of complaints? Apart from the example of ActionAid Mozambique, what process does AA use to ensure that, when complaints are substantiated, corrective action is taken to ensure that ALL stakeholders affected by the issue (not just the complainant) are reached?</p> <p>Finally, the Panel highlights the importance for the remaining 12 country offices to implement a formal mechanism/policy for feedback and complaints.</p>
NGO3	<p><i>Programme monitoring, evaluation and learning</i> <i>Fully addressed</i></p> <p>ActionAid can be commended for complementing their strategy with a global M&E Matrix including 60 internationally agreed indicators of success to measure qualitative and quantitative performance. The Panel would appreciate a link to the global level M&E Matrix in the next report and looks forward to first reports on the attained progress against the indicators.</p> <p>It further commends ActionAid for supporting its M&E activities with substantial investment into building capacities and looks forward to progress in regard to the identified priorities (e.g. training, peer support, e-learning, tool kit for data collection, evaluation policy). Finally, what evidence does ActionAid have that MEL processes work well in practice and lead to improved results?</p>
NGO4	<p><i>Gender and diversity</i></p>

	<p><i>Partially addressed</i></p> <p>The answer provides superb examples on how ActionAid promotes and actively supports the empowerment of women and disabled people in their programmes (e.g. the Women-Led Emergency Response model in ActionAid Bangladesh). However, apart from the procedures for Children’s Rights Education, more information on general policies addressing diversity in a broader sense i.e. people potentially excluded from ActionAid’s work due to disability, ethnic minority, illiteracy etc. are welcome in the next report. Currently they are just addressed in the anecdotal case studies. Has ActionAid set itself concrete targets in this regard?</p>
NGO5	<p><i>Advocacy positions and public awareness campaigns</i></p> <p><i>Fully addressed</i></p> <p>ActionAid describes a very systematic and inclusive process on how it arrives at campaigns and policy positions. Annual review and reflection through steering groups involving both international and national staff identify if adaptations become necessary at any point.</p> <p>But does the organisation adhere to this in practice, as flagged by a recent media controversy? The major UK newspaper, The Independent, carried an article on 23 March on AA Uganda’s campaign against GM crops (see online). The article says that AA Uganda has been telling farmers that such GM crops can cause cancer and quotes various scientists who repudiate such a claim and state that negative health effects are not substantiated by any research. It went on to say that AA UK responded to the newspaper that AA Uganda was in the wrong in making this case, that all AA chapters have been explicitly instructed not to claim ill health effects from GM crops, that AA Uganda has apologized and withdrawn its claims. This calls into question whether the rigorous clearance process described by AAI regarding its advocacy positions is reflected in practice, or are AA chapters free in practice to campaign on what they like without any consequences as to counter-claims. Would AA UK (or International Secretariat) have taken any action had it not been for the prominent article? Is there any international monitoring of the advocacy and campaigning of Associates/Affiliates? Has AA UK or International asked AA Uganda to reach out to the farmers and others who it reached initially with messages about the health dangers of eating GM crops with a retraction stating that AAU now recognizes there is no scientific evidence to substantiate the claim? Moreover, there is a considered retraction on AA UK’s website, but no reference to the issue in AA International’s website and, most significantly, a rather defiant message on AA Uganda’s website – where the most important stakeholders reside. This issue will be followed up on by the Panel in subsequent bilateral conversations with ActionAid.</p> <p>Further information on AAI’s Country Entry and Exit policy is provided under SO1.</p>
NGO6	<p><i>Coordination with other actors</i></p> <p><i>Addressed</i></p> <p>ActionAid’s appraisal stage prior to any programmes demonstrates a thorough analysis of activities of other stakeholders in terms of possible coordination and cooperation that leverage each other’s impact. The Panel would welcome some more information on how ActionAid ensures that partners meet high standards of accountability. Apart from the interesting country examples, it would also be important to provide evidence that ActionAid’s systems generally work well in</p>

	<p>practice. Is there evidence e.g. from the external evaluations and peer reviews that have looked at how well ActionAid has collaborated with others? All examples given address collaboration with large ICSOs, but the Panel assumes that the same methods apply to ensuring good collaboration with small local CSOs and partners.</p>
II. Financial Management	
NGO7	<p>Resource allocation <i>Fully addressed</i></p> <p>ActionAid publishes their audited accounts on their website. A link to these accounts as well as to the mentioned Resource Allocation Framework (RAF) and Financial Management Framework should be provided in the accountability report.</p> <p>The organisation is commended for effectively tracking restricted income secured and contract management obligations and for reducing instances of disallowed donor expenditure as a result. The Panel looks forward to progress in the identified seven priority areas and to the launch of the Contract Management System (CMS) that will go live in summer 2016.</p> <p>The Panel flags that a total staff of 2,982 for an NGO whose income is 226 million EUR in 2013 seems rather high (i.e. 76,000 EUR / core staff-member). On unrestricted fund income (totalling 77 million EUR) the fundraising and governance costs are over 40 million EUR which also seems comparably high. Overall, fundraising accounted for 22% of total expenditure in 2013, compared to 20% in 2012. Over the last 3 years income has been steady but programme spending has reduced quite steeply as other costs have risen.</p>
NGO8	<p>Sources of Funding <i>Partially addressed</i></p> <p>This indicator asks for the five single largest donations to ActionAid by source. From the information provided it is not clear if the donations collected in the UK and Italy (being the single largest amounts) have been collected from one or more individual donors in these countries. Please clarify in the next report the five single largest contributions. If one or two come from individual donors, ActionAid must not disclose their name, but identify the country they come from.</p>
III. Environmental Management	
EN16	<p>Greenhouse gas emissions of operations <i>Fully addressed</i></p> <p>The organisation is very specific about how and which data are obtained. The number of units reporting their emissions has improved continuously over the last years. Overall, ActionAid is commended for reporting a detailed breakdown of direct and indirect greenhouse gas emissions by country offices. It will be helpful in the future to have an overview with previous years to allow for comparison.</p> <p>The Panel would like to highlight a slight inconsistency: Whereas the increase in greenhouse gas emissions from 2012-13 is given as 18% in the next, the following chart does not reflect this.</p>
EN18	<p>Initiatives to reduce emissions of operations <i>Fully addressed</i></p>

	<p>In spite of reductions in previous years, it is stated that the emissions increased by 18% from 2012 to 2013 which is mostly due to increased air travel in relation to Post-2015 discussions. Interesting initiatives to reduce emissions (e.g. voluntary off-setting, energy-saving lighting, vehicle-sharing, eco modes, public transport, video conferencing) are provided from the International Secretariat as well as country level.</p>
EN26	<p>Initiatives to mitigate environmental impact of activities and services <i>Addressed</i> ActionAid does not measure or analyse their environmental impacts of programmes and projects yet. The Panel supports current plans to include environmental impact as one of the driving factors when making decisions about projects or engagements. It is particularly interested to be informed on progress of how environmental impact is included in ActionAid's Value for Money approach.</p>
<p>IV. Human Resource Management</p>	
LA1	<p>Size and composition of workforce <i>Fully addressed</i> ActionAid comprehensively reports on the total number of staff divided into gender, location, responsibility levels, clusters of professions and work contracts including volunteers. However, mentioned staff categories are not sufficiently explained.</p>
EC7	<p>Procedure for local hiring <i>Fully addressed</i> ActionAid is fully committed to working through local people for local jobs. In 2013, the number of expatriate contracts was 43 out of 2,982 staff. Expatriates are clearly the exception to the rule which is positively highlighted by the Panel. This can be seen as Good Practice. However, a link to the mentioned Remuneration and Benefits Policy as well as reflection on local capacity building would be appreciated in the next report.</p>
LA10	<p>Workforce training <i>Partially addressed</i> ActionAid reports that (actually in line with the new Charter Reporting Requirements) it does not want to record the training hours each staff member has received, but rather look at training per unit of staff, cost of training and the evaluation of its effectiveness. In the report itself, however, it stops short at informing the reader that employees received an average of 5 days training.</p> <p>The Panel would be interested how ActionAid identifies training needs, in the total cost of staff training as percentage of the administrative overall budget and in qualitative evidence that training is effective.</p> <p>Finally, the Panel would like to point out that statistics on staff training do not seem to tally in the two charts on page 41.</p>
LA12	<p>Global talent management <i>Addressed</i> Is there a systematic assessment of ActionAid's future needs in regard to personnel capacity and capability globally? How do you ensure to have the right people with the right capabilities in place at all times to optimally drive ActionAid's</p>

	<p>impact? How does strategy translate into staff performance indicators?</p> <p>ActionAid reports that the number of staff having completed performance management reviews decreased from 93% (reported in 2012) to 77% in 2013. It would be good to understand why this number decreased so significantly and how you plan to improve numbers again. Do you have evidence that appraisals work well in practice?</p>
LA13	<p><i>Diversity of workforce and governance bodies</i> <i>Partially addressed</i></p> <p>ActionAid reports a good balance of gender and geographic backgrounds at International Board level. National boards show similar gender equality in average if also some countries only present uneven distribution in both directions. AAI further aspires that ideally 50% of the members of the General Assembly should be women and at least 50% should be from poor and excluded communities.</p> <p>The percentage of employees per gender is provided under indicator LA1. However, a gender breakdown is not provided for senior staff which is seen as important in UK's current pay gap debate. Moreover it is not clear what is meant by "top" cluster of staff – and why this accounts for just 3% in the International Secretariat and for 64% in Africa; is there a staff grading system used for this? It is not credible that such a high percentage of African staff would be at this level. Finally, information on other diversity factors such as age, minority groups, or disabilities is missing.</p>
NGO9	<p><i>Mechanisms to raise grievances</i> <i>Fully addressed</i></p> <p>ActionAid can be commended for a broad range of meaningful policies for staff to raise grievances to the management – including a Whistle Blower Policy, Grievance Policy and Procedures, Anti-sexual harassment policy etc. Does the organisation have evidence that concerns raised were resolved satisfactorily?</p>
V. Responsible Management of Impacts on Society	
SO1	<p><i>Managing your impact on local communities</i> <i>Fully addressed</i></p> <p>The Panel appreciates ActionAid's thorough reflections about the effect of its work at community level. The provisions of a federation wide Country Entry and Exit Policy (2012) are comprehensively laid out in this report and the full policy can be accessed via the intranet. Further information on the impact on communities (e.g. how ActionAid ensures human rights and child protection) is described under NGO1. Finally, it would be interesting to know what kind of feedback ActionAid received from communities to show that policies work well in practice.</p>
SO3	<p><i>Anti-corruption practices</i> <i>Addressed</i></p> <p>ActionAid drafted a commendable and systematic Anti-Corruption and Anti-Bribery Policy in 2012 which will be operationalised in 2014. The policy is available on their intranet. Training modules will be part of the roll-out process starting in the same year. The Panel looks forward to being informed on first results and would be also interested to know if systematic risk analysis on where ActionAid's work could be exposed to corruption, bribery, fraud or conflicts of interest is part of this policy. Finally, the Panel wonders why the policy is included</p>

	<p>in the Financial Management Framework since systematically assessing corruption and bribery risks and mitigating their negative effects is a task well beyond financial management.</p>
SO4	<p><i>Actions taken in response of corruption incidents</i> <i>Partially addressed</i> ActionAid's newly revised Anti-corruption and Anti-Bribery Policy covers the following areas: Corruption by partner organisations, recovery of losses, and safety of personnel. However, this indicator specifically asks if any (and what kinds of) incidents of corruption happened in 2013 and how they were detected and resolved. The Panel would welcome a more systematic reflection on this issue in the coming year.</p>
<p>VI. Ethical Fundraising</p>	
PR6	<p><i>Ethical fundraising and marketing communications</i> <i>Partially addressed</i> ActionAid provides the same answer as in the previous year and does not include any Panel recommendations to this indicator. The organisation states to have a multitude of fundraising and marketing policies in place that serve as a minimum standard only. At the national level, senior management and national Boards ensure compliance with the diverse regulations in different jurisdictions. ActionAid International audits compliance every two years. Please report the number of complaints for breaches of fundraising regulations and actions taken in the next report.</p> <p>Moreover, do the complaints in Italy, UK and Greece, for example, concern fundraising approaches? Are donors, child sponsors and others contributing to AA informed about how income is used (for overheads, fundraising etc.) as well as for the programmes?</p>