

Feedback from the Independent Review Panel Review Round June 2015

Berlin, 06 July 2015

Dear Danny Sriskandarajah,

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 18 reports submitted for the fall 2014 and spring 2015 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 CIVICUS

CIVICUS' sixth accountability report is regarded as overall very good, comprehensive and has improved in comparison to previous reports – in regard to better internal procedures in place and improved quality and availability of data for this report.

The following answers are seen as **Good Practice** for other CSOs: Rigorous procedures in place to ensure thorough evidence base of the organisation's advocacy positions (NGO5) and conducting quarterly performance reviews with *all* staff (LA12).

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](#)). Only when a commitment to accountability is prominently visible, can people hold an organisation to account. CIVICUS' **institutional commitment** to accountability is strong in regard to improving internal processes and structures such as Monitoring, Evaluation and Learning as well as reducing CO₂ emissions. Institutional commitment to accountability as a strategic driver for active engagement of key stakeholders to co-create positive results is less visible - but highly important in this context. Please also see our comments on the CEO statement under 1.1.

The Panel found it difficult to understand CIVICUS' concrete relationship between their headquarters and members ("fluctuating membership" between 92 and 145 voting organisations according to the dashboard in Annex III of the report). This issue should be seen in light of a complaint made to the Charter Secretariat in spring 2015 pointing out that it is easy for a "fake" or non-existent organisation to be approved as non-voting member. CIVICUS' Membership Committee is urged to review this approval process. Another area of concern is the fact that previous Panel feedback seemed not to be addressed from CIVICUS so that several questions from last year's report remain relevant in this Panel feedback.

Other **weaknesses** include the process for putting this report together (3.5), a mandatory feedback and complaints handling policy (NGO2) which would also be the basis to move to biannual reporting in the future, and environmental sustainability (EN16, EN18, EN26) which has slightly improved but should be more systematically targeted in the future. Moreover, answers to several indicators from the updated reporting guidelines were initially missing but were submitted upon request.

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.

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 06 August 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,



Louise James



Michael Röskau



Jane Kiragu



Rhonda Chapman



John Clark



Saroeun Soeung

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

CIVICUS

Reporting period: July 2013 – June 2014

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	<p>Statement from the most senior decision-maker <i>Partially addressed</i></p> <p>The opening statement of CIVICUS' Secretary General shows commitment to accountability and internal improvements towards world class practice. While this is positively noted by the Panel, the strategic relevance of <i>accountability</i> to CIVICUS remains unclear. How does strong accountability practice help CIVICUS achieve greater impact? How does it help the organisation to engage key stakeholders in meaningful co-creation processes that drive better, long term results?</p> <p>The Panel strongly encourages CIVICUS to think through the above questions with its senior leadership team and constituencies to ensure the full potential of accountability is used. In the business sector CIVICUS would be asked to tell us how they create optimal <i>shareholder value</i> – in the Charter context the Panel asks how CIVICUS creates optimal <i>stakeholder value</i>. The Panel looks forward to hearing CIVICUS' answers in the next report and offers a bilateral conversation with Panel members in the meantime, if they wish. Moreover, <u>as mentioned in last year's feedback</u>, a personal signature under the statement is welcome for the next report.</p>
II. Organisational Profile	
2.1 – 2.2	<p>Name of organisation / Primary activities <i>Fully addressed</i></p>
2.3	<p>Operational structure including national offices <i>Fully addressed</i></p> <p>The answer provides relevant information relating to the operational structure of the CIVICUS secretariat. However, some information on board and governance would be better placed under e.g. 4.1 or 4.3 in order to reduce duplicity of information. The Panel is astonished that CIVICUS is able to spread their small secretariat (30-40 employees according to LA1, 25 as presented on their website) over 4-5 locations around the world.</p>
2.4 – 2.6	<p>Headquarter location / Number of countries / Nature of ownership <i>Fully addressed</i></p>
2.7	<p>Target audience <i>Fully addressed</i></p> <p>Relevant information about the target audience and affected stakeholders is given and a list with all voting members is provided in Annex I.</p>

2.8	<p>Scale of organisation <i>Fully addressed</i></p> <p>The answer provides a comprehensive picture of the organisation’s overall scale. CIVICUS can be commended for increasing its income by 81% from 2013 to 2014. However, the Panel would be interested to know how consistent planning is ensured with this level of fluctuation / increase and if this has any impact on CIVICUS’ activities.</p>
2.9	<p>Significant changes <i>Fully addressed</i></p> <p>CIVICUS states that they “remained stable during the reporting period”. However, an 81% increase of income within one year seems to be a quite substantial change.</p>
2.10	<p>Awards received <i>Fully addressed</i></p>
III. Report Parameters	
3.1 – 3.4	<p>Reporting period / Date of most recent report / Reporting Cycle / Contact person <i>Fully addressed</i></p>
3.5	<p>Reporting process <i>Partially addressed</i></p> <p>Compiling this report is a great opportunity to engage key stakeholders - i.e. staff - across all functions in a collective effort to review the values guiding our work and how well we do against our commitments. Accountability is not a reporting exercise – it is a <i>culture</i> that needs to be lived and breathed by the entire organisation to come alive. Against this background the Panel would like to see much more on how CIVICUS uses this opportunity to engage widely with their staff. <u>The Panel asked CIVICUS this question already in the last report</u>; however, little progress is seen in this report.</p> <p>CIVICUS is encouraged to provide more information on the process for defining report content, how the report’s content is compiled, who contributes in which way (e.g. 3.10 mentions input from management team) and how the reporting process is used to critically reflect and fully embed accountability across all functions in the organisation in the next report. The last point is particularly important to raise more awareness and ownership for the Charter commitments among staff. This is about stakeholder engagement - making sure it is there and demonstrating it.</p> <p>The Panel suggests seeking advice from Charter Members that have established cross-functional and cross-regional teams to compile and write the report to ensure it is deeply rooted within the organisation (e.g. CBM). Other Members like Amnesty International have used feedback from the Independent Review Panel to devise an improvement plan to ensure that their recommendations are addressed in the next report. Progress on the improvement plan is regularly evaluated by the Senior Leadership Team and results reflected in the next report.</p>

	Finally, it is important to widely share the accountability report internally and externally to ensure stakeholders know what CIVICUS commits to and how it has progressed against these commitments. CIVICUS is encouraged to enclose information on which specific stakeholders are expected to use the report in which way and how their feedback is used.
3.6	Report boundary <i>Fully addressed</i> 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.
3.7	Specific limitations <i>Fully addressed</i> 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 (e.g. the dashboard in Annex III).
3.8	Basis for reporting <i>Fully addressed</i> In addition to the boundaries mentioned in 3.6, CIVICUS cannot ensure if consultants adhere to the Charter's accountability commitments. As also indicated in the general statement at the beginning, CIVICUS is encouraged to critically review their approval process for non-voting members as highlighted by the complaint received by the Charter Secretariat.
3.10 – 3.12	Changes in reporting parameters / Reference table <i>Fully addressed</i>
IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	Governance structure <i>Partially addressed</i> A valuable overview of the governance structure including different Board committees is provided. However, <u>as also requested last year</u> , more information on where this governance model is challenging and where it optimally supports CIVICUS' effectiveness and the achievement of the organisation's mission in practice is welcome in the next report. Moreover, the Panel would be interested to learn more about CIVICUS' risk management in place that ensures compliance with relevant laws and regulations.
4.2	Division of power between the governance body and management <i>Fully addressed</i> 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. Other division of powers are presented in 2.2.
4.3	Independence of Board Directors <i>Fully addressed</i> 2.2 states that Board of Directors comprises of 14 members. The Secretary General is an ex-officio Board member and the only person paid on the Board.
4.4	Feedback from internal stakeholders

	<p><i>Partially addressed</i></p> <p>CIVICUS provides a comprehensive overview of the different ways that members and employees can provide recommendations to the Board – e.g. the Annual General Meeting (conducted virtually in 2014) or scheduled staff-Board interactions. These are good processes, however, in the next report 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.</p>
4.5	<p>Compensation for members of highest governance body</p> <p><i>Partially addressed</i></p> <p>CIVICUS provides no financial compensation for their Board Directors. However, this indicator asks not only for the governance body but also for compensation towards senior managers. The Panel looks forward to more information on CIVICUS' salary levels in the next report.</p>
4.6	<p>Conflicts of interests</p> <p><i>Fully addressed</i></p>
4.10	<p>Process to support highest governance body's own performance</p> <p><i>Partially addressed</i></p> <p>The Panel would like to know how results from Board's self-evaluation are used to further improve the effectiveness of this body. Moreover, more information on how procedures for the appointment, term limits, and responsibility of Board members support their own success.</p>
4.12	<p>Social charters, principles or other initiatives to which the organisation subscribes</p> <p><i>Fully addressed</i></p>
4.14	<p>List of stakeholders</p> <p><i>Addressed</i></p> <p>The answer provides a comprehensive overview on CIVICUS' stakeholders and a list of all names in Annex I. Nevertheless, the organisation is encouraged to review their membership criteria for non-voting members (see Panel's general comment in the beginning).</p>
4.15	<p>Basis for identification of stakeholders</p> <p><i>Addressed</i></p> <p>CIVICUS launched its updated membership policy in 2013 which "has been very effective in increasing CIVICUS' reach globally and also helping (...) engage with new stakeholders (...)". This is commendable; however, a link to this policy would have been helpful since actual identification, selection and prioritisation of stakeholders remain vague in the answer – <u>as also indicated in last year's Panel feedback</u>.</p>
4.16 – 4.17	<p>Formats of engagement</p> <p><i>Moved to NGO1.</i></p>

PERFORMANCE INDICATORS

I. Programme Effectiveness

NGO1	<p><i>Involvement of affected stakeholder groups</i> <i>Fully addressed</i></p> <p>CIVICUS defines its own membership as the primarily affected stakeholders. Viewed as such, it gives valuable and very concrete examples of their involvement in key decision-making processes (e.g. Strategy and Leadership Survey) and in flagship publications or projects (e.g. State of Civil Society Report and the Civic Space Initiative). Partners did not only provide input but shaped these projects together which is commendable as a very meaningful process of co-creation with key stakeholders. Nevertheless, the Panel would welcome more concrete <i>evidence</i> how these processes have positively affected the decision-making or reshaped procedures.</p>
NGO2	<p><i>Mechanisms for feedback and complaints</i> <i>Partially addressed</i></p> <p>The Panel appreciates that CIVICUS has got a well-established practice of receiving (is there a specific email address or contact form for this purpose?) and dealing with feedback and complaints which is also part of quarterly or biannual performance reports of all projects and departments. The Charter Secretariat received a complaint regarding a campaign in India which CIVICUS tried to resolve in a professional manner (e.g. offering bilateral Skype conversations with the complainant, outlining their perspective etc.).</p> <p>However, CIVICUS did not follow up on the promise made in the <u>last report</u> to draft a formal complaints handling policy as part of the revised Impact Planning and Learning Framework in 2013. A formal feedback and complaints handling policy is <i>mandatory</i> for all Charter Members. Against this background please let us know:</p> <ol style="list-style-type: none"> 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? 2) What is the formal process in which any feedback/complaint is processed, attended to and resolved where necessary? 3) How does CIVICUS ensure aggregated feedback is meaningfully fed into decision making? It is assumed that No.3 is included in the Impact Learning process – please clarify. <p>A formal policy and well evidenced practice on this indicator is also the basis to be allowed for the new biannual reporting cycle for Charter reports.</p>
NGO3	<p><i>Programme monitoring, evaluation and learning</i> <i>Addressed</i></p> <p>CIVICUS lists a number of internal assessments in the reporting period and the Panel appreciates that e.g. the investment policy was benchmarked against Charter standards. Concrete evidence how these changes have led to significant improvements are welcome in the next report. The Panel also positively notes the newly developed Organisational Dashboard (Annex III of the report) that measures progress of key indicators of the organisation. It would, moreover, be interesting to know how progress is measured against CIVICUS' six core principles (page 18).</p> <p>Overall, it would be very helpful to hyperlink policies and evaluations that are of interest for the general public.</p>

NGO4	<p>Gender and diversity <i>Partially addressed</i></p> <p>The Panel supports CIVICUS' view to improve the organisation's mainstreaming of gender and diversity throughout its programmes. Has CIVICUS set itself any targets in this regard? The Panel suggests implementing systems to identify stakeholders that are potentially excluded from CIVICUS' work due to e.g. disability, ethnicity, poverty, illiteracy, age or gender. The Gender and Diversity Scorecard or the Youth Advisory Group seem like valuable first steps, however, a link to the scorecard would have been helpful.</p> <p><u>As mentioned in previous Panel feedback</u>, a link should also be provided to CIVICUS' gender and diversity policy along with evidence that this policy works well in practice. Finally, this indicator only asks for inclusion and diversity as a principle of CIVICUS' programmes not its staff or Board. The latter should be dealt with under LA13.</p>
NGO5	<p>Advocacy positions and public awareness campaigns <i>Fully addressed</i></p> <p>CIVICUS can be commended for rigorous procedures in place to ensure thorough evidence base of the organisation's advocacy positions – e.g. meaningful stakeholder consultation (also locally), research, partner feedback from the ground, management monitoring, publications, and corrective adjustments after external criticism. This is seen as Good Practice for other organisations. Are there examples for corrective actions or for exiting a campaign?</p>
NGO6	<p>Coordination with other actors <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. They have established sound criteria in place for the selection of their partners and 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.</p> <p>Moreover, CIVICUS is encouraged to provide evidence that the effectiveness of partnerships is evaluated and works well in practice – leveraging each other's strengths. <u>As already requested last year</u>, the Panel would be interested to know if there was a written policy in place.</p>
II. Financial Management	
NGO7	<p>Resource allocation <i>Fully addressed</i></p> <p>The report outlines a robust resource allocation and tracking system with multiple policies and standards in place. In the next report please provide a link to CIVICUS' last externally audited financial figures as well as more information on how the organisation ensures the effectiveness of these processes in achieving key strategic objectives.</p>
NGO8	<p>Sources of Funding</p>

	<i>Fully addressed</i>
III. Environmental Management	
EN16	<p><i>Greenhouse gas emissions of operations</i> <i>Addressed</i></p> <p>The Panel assumes that this indicator applies to the international secretariat only. The organisation provides information on its greenhouse gas emissions and on consumption of electricity, gas and travel. Travel has increased in the reporting period when compared to the previous reporting timeframe. It would be good to give an explanation on why this is the case. No indication is given that CIVICUS sets itself a reduction target for the coming year, but the investment in solar energy provision is welcome. For the next report: please visualise the carbon footprint development <i>over years</i> in a graphic way that allows seeing developments more easily.</p>
EN18	<p><i>Initiatives to reduce emissions of operations</i> <i>Partially addressed</i></p> <p>While it is accepted that CIVICUS' work will always necessitate traveling (leading to CO₂ emissions) to fulfil the organisation's mission, it is appreciated that the organisation thinks about possibilities to reduce the relative output of CO₂.</p> <p>The Panel recommends implementing an explicit Environmental Management Policy with senior management support, clear targets, a sound monitoring system, and visible responsibilities and championships within the organisation. The Panel looks forward to progress in this regard and how this will impact CIVICUS in the next report.</p>
EN26	<p><i>Initiatives to mitigate environmental impact of activities and services</i> <i>Addressed</i></p> <p>CIVICUS lists a number of activities to reduce their environmental impact. Prior to this, it might be helpful to identify the main environmental impacts of their programmes and projects. Does CIVICUS conduct any environmental assessment before carrying out activities?</p>
IV. Human Resource Management	
LA1	<p><i>Size and composition of workforce</i> <i>Addressed</i></p> <p>The answer provides numbers of full-time employees, volunteers, interns and consultants. However, more information on the different responsibility levels and the geographical breakdown of staff in "17 countries" would be welcome for the next report.</p>
EC7	<p><i>Procedure for local hiring</i> <i>Fully addressed</i></p> <p>CIVICUS describes their recruitment processes; a link to the mentioned recruitment policy would be appreciated in the next report. 37.5% of the management team are local hires but more importantly, the international secretariat represents a broad diversity and a greater number of staff are from the Global South than from the Global North (see LA12). How does CIVICUS ensure that their local hiring practices build overall local capacities and do not undermine local NGOs or the local public sector?</p>

LA10	<p>Workforce training <i>Addressed</i></p> <p>CIVICUS provides 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 apart from feedback gathered from the performance reviews (see LA12).</p> <p>It is positively noted that the Culture of Learning (CoL) programme is well received from staff and the Panel looks forward to further progress in the next report. Moreover, the Panel would welcome information on how much CIVICUS invests as percentage of the overall administrative budget into training their workforce.</p>
LA12	<p>Global talent management <i>Fully addressed</i></p> <p>CIVICUS is commended for conducting quarterly performance reviews with <i>all</i> staff. This is seen as Good Practice. A link to the mentioned performance management policy would be appreciated in the next report. Moreover, concrete examples of how feedback from the reviews has shaped the Nine Box Performance and Potential Grid would be helpful for the reader of this report. Does this approach follow an overall management development plan for the entire organisation to meet key strategic priorities?</p>
LA13	<p>Diversity of workforce and governance bodies <i>Fully addressed</i></p> <p>CIVICUS is commended for an exceptional gender and age diversity at the management, workforce and Board level – particularly in terms of engaging with the youth and electing two Youth Advisory Group members to the CIVICUS Board of Directors in 2013. Some information from NGO4, such as the youth engagement at Board level or the diversity table, should be presented in LA13.</p>
NGO9	<p>Mechanisms to raise grievances <i>Partially addressed</i></p> <p>The ways to raise grievances are outlined in the Staff Handbook and a link to the relevant information would have been useful. Does CIVICUS have any evidence that concerns raised were resolved satisfactorily?</p>
V. Responsible Management of Impacts on Society	
SO1	<p>Managing your impact on local communities <i>Fully addressed</i></p> <p>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. Links to these mentioned documents and information on any feedback received from communities would be appreciated in the next report.</p>
SO3	<p>Anti-corruption practices <i>Partially addressed</i></p> <p>CIVICUS is asked to provide information on any systematic risk analysis on where</p>

	<p>their work might be exposed to corruption, bribery, nepotism, fraud or conflict of interest. Moreover, <u>as mentioned in the previous Panel feedback</u>, please provide a 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><i>Actions taken in response of corruption incidents</i> <i>Addressed</i> CIVICUS states that no corruption incidents were reported in 2013-2014 and outlines different activities to prevent corruption and fraud (e.g. partner checklist, technologies to prevent cyber-attacks on data) which could also be listed under SO3. This indicator asks for <i>general procedures</i> and <i>potential publication</i> of any incidents once they appear.</p>
<p>VI. Ethical Fundraising</p>	
PR6	<p><i>Ethical fundraising and marketing communications</i> <i>Fully addressed</i> CIVICUS has got several procedures in place to ensure that their fundraising activities are in line with the organisation's five basic principles, South African law and the UNDHR. This also includes a Resource Mobilisation Policy in place reflecting Ethical Fundraising Guidelines and the Charter. <u>As already requested last year</u>, a link to this policy would be welcome. CIVICUS states that they have not received any complaints in this regard during the reporting period.</p>