ARTICLE 19
Independent Review Panel Feedback
Accountability Report 2017
Review Round January 2019
Dear Thomas Hughes,

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

ARTICLE 19’s second interim report outlined several developments relating to governance, risk management, monitoring, evaluation, and learning, and fundraising. The Panel notes these efforts, and sees them as indicative of a commitment to improving accountability in the organisation.

Updates were provided on the areas for improvement which the Panel had previously identified. The requested information on workforce composition was provided, and the Panel is pleased to see a new webpage on accountability which links to Article 19’s whistleblower policy. However, informational about the external complaints mechanism is still not publicly available, and the Panel continues to see this as a major deficiency which should be addressed urgently.

The report would have benefitted from further details and more illustrative examples to demonstrate how accountability works in practice, and the Panel encourages this in the next full report.

Our intention is that this feedback letter, and any response you may wish to provide, is made publicly available on the Accountable Now website along with your report – as it is the case with all previously reviewed reports. 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 any comments or amendments by 12 March 2019. If you have any other feedback or comments on our work, please share them with us by sending them to the Accountable Now Secretariat.

Yours sincerely,

Accountable Now’s Independent Review Panel
## Profile Disclosures

### I. Strategy and Analysis

1. **Statement from the most senior decision-maker**

   **Addressed**

   ARTICLE 19 sees the requirement to hold themselves accountable as powerholders as being at the core of their work. The statement refers to the Annual Reflection Process looking at the impact of Article 19’s human rights strategy, and an external review of the strategy as examples of how accountability shapes strategy and decision making. Further explanation of the link between these activities and accountability driving decision-making would have been helpful.

   The external review identified the need to see organisational development as a key part of delivering the human rights strategy (in addition to human rights work itself). Development of thematic management, infrastructure, and internal communications were the key areas identified for future focus. The external review was shared with donors and the International Board. Article 19 is undertaking an internal organisational review to identify how to more effectively deliver its strategy.

   Whilst the examples provided indicate that Article 19 is open to reviewing ways of working, in future the Panel would like to see more about why accountability – in particular dynamic accountability – is important to the organisation as well as more exploration of how accountability processes are enacted. With the review of the human rights strategy for example, we would have liked to know which stakeholders were involved in the process and more information about follow-up steps – will the results of the internal review be fed back to those who took part in the external review? Information about other key accountability-related developments would also have been welcome, such as the relaunch of Article 19’s MEL system, the good governance manual for trustees, and the new accountability section on the website.

   The Panel would like to flag that in future, we will ask that the opening statement refer to the top three accountability related issues the top decision maker is focusing on, including successes and challenges. We also request that the statement be signed in future, so that readers know who the statement is from.
Material Changes

A number of changes which took place in 2017 are outlined. In terms of Board performance and accountability, the Board developed a new Good Governance Manual, which provides guidance and best practices for trustees. The Panel notes this document positively, particularly the section on openness and accountability, which pushes for better consultation and engagement with stakeholders, as well as openness to feedback and learning from mistakes. The document also describes the division of responsibilities between management and trustees, and affiliates and the General Assembly. The Board has also prepares key performance indicators for their performance, and are commissioning an external review.

The opening statement pointed out that Article 19 has been growing, and two new offices were opened (in Amsterdam and New York) in 2017, focusing on the Europe and Central Asia programme, and fundraising and advocacy efforts.

In terms of risk management, the Board commissioned a review of Article 19’s security framework. As a result, an Enterprise Information Security Framework was developed, an IT review was undertaken, and a project is being implemented to strengthen digital security capabilities. The Panel looks forward to an update in the next full report.

Article 19’s monitoring, evaluation and learning system, AIMS, was relaunched in November 2017, following revisions and developments which began in 2015. AIMS is not the primary organisational project management tool, capturing strategic and project performance data on a quarterly basis. The Panel welcomes this important development and looks forward to more information on its use in the next report.

Finally, an update on Article 19’s fundraising efforts was provided. A more strategic approach and better coordination between international and regional offices in 2016 saw the number of submissions double from 2015 rates, and a 30% increase in secured funding. The Panel congratulates Article 19 on this achievement.

IV. Mission, Values, Governance, and Stakeholder Engagement

4.5 Compensation for members of highest governance body, senior managers and executives

Partially addressed

The Panel had previously asked for information about salaries of senior managers and executives, and an update on Article 19’s salary benchmarking exercise. The benchmarking exercise saw salary increases in two stages, in 2015 and 2016, following negotiations with staff representatives in early 2015. In the next report, the Panel requests information about the new salary scales, and the salaries of the five most senior positions in the organisation.
As stated in previous reports, members of ARTICLE 19’s board are not compensated and work on a voluntary basis.

**PERFORMANCE INDICATORS**

I. Programme Effectiveness

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<td>Article 19’s website was updated in 2017, and a section on accountability now includes a link to the whistleblowing policy for internal complainants. The Panel appreciates this progress and notes that a separate policy for internal complaints and grievances has been developed. More information will be provided in the next report, and the Panel strongly encourages Article 19 to also make this policy available online. However, information regarding external complaints is still lacking. The report says that no complaints were received as of Q1 2018, but the website still has no information about the complaints policy or process for external complainants. With no public information about how to submit a complaint, and no information provided in the report as to how Article 19 publicises its complaints process, the Panel is not convinced that potential complainants would be able or feel encouraged to submit a complaint. The inclusion of this information on Article 19’s website has been postponed for several years now (the response to the Panel’s last feedback letter in April 2018 stated that this would be done in Q2 2018, with a revised external complaints procedure) and no update was provided in this report as to the current status. The Panel sees this as a major deficiency in Article 19’s fulfilment of the accountability commitments, and requests an update in response to this feedback letter, with a clear timeline of when the relevant information and policy documents will be online.</td>
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IV. Human Resource Management

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<td>In response to the Panel’s request in its previous feedback, the report provides a breakdown of the workforce by region, gender, and responsibility level. The Panel appreciates this and notes positively that 67% of the global management team is female.</td>
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In future reports, the Panel would like to see further information, including age, contract type (full/part time), local/expat hires, and other relevant factors such as disability. By providing all of this information, a fuller overview of the diversity of the workforce can be achieved. An example to refer to is from Sightsavers’ [2017 report](#) (pp. 22-24), though we would also want to see the proportion of men and women in senior management positions.