Dear Adriano Campolina,

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 seven 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 ActionAid International
ActionAid International’s eighth accountability report to the INGO Accountability Charter is a concise interim report based on last year’s Improvement Analysis, which came along with the Independent Review Panel’s feedback letter.

Institutional commitment is highlighted in the opening statement demonstrating how external challenges influence ActionAid’s major restructuring process to become more global and better connected to poor people. It is appreciated that ActionAid presents Charter membership on their website on transparency, publishes the Charter logo and links to reports (see here). This visualisation clearly strengthens their public commitment to accountability – also for stakeholders to hold them directly accountable towards the commitments made. The Charter will only be seen as a strong collective agreement of the entire sector to accountability if Members actively and proudly support communication around it.

All issues raised in the recent Improvement Analysis are covered. While some progress is already satisfactory, other areas can still be improved: Information on complaints mechanisms at national level is missing (NGO2), staff diversity data can only be shared from 2017 onwards (LA13), and more details how the Policy and Campaigns Team ensures coherence and quality control of advocacy work across the federation would be interesting (NGO5). Overall, it is clear that ActionAid tries to incorporate Panel feedback into ongoing or new initiatives or reviews. The Panel looks forward to further improvements in the identified areas and to reviewing the next 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 15 May 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,

Louise James       ∙         Michael Röskau       ∙     Jane Kiragu

Rhonda Chapman       ∙         John Clark       ∙      Saroeun Soeung
**PROFILE DISCLOSURES**

### I. Strategy and Analysis

#### 1.1 Statement from the most senior decision-maker

**Fully addressed**

Adriano Campolina (Chief Executive) provides a strong institutional and strategic commitment towards mutual accountability for ActionAid’s mission. As also outlined in ActionAid’s Accountability Charter, accountability is mainly understood as to strengthen their legitimacy and as to being “part of a dynamic process to advance change and as part of their theory of change”.

Mr. Campolina describes a comprehensive description of external challenges and how this has substantially affected the federation’s governance structure and work. One of the results is increased countries’ engagement to influence policy change at a global level. Moreover, the accountability unit was placed in the Chief Executive Directorate to ensure strong leadership in this regard. First benefits of this deeper country engagement and increased collaboration are visible but will become more evident in coming years. The Panel looks forward to being informed how this progression evolves and on new actions as a consequence of the described challenges.

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### Structural and Material Changes in 2014/2015

ActionAid provides an interesting overview of major changes in 2014 which will continue in 2015. In terms of their governance structure, a Federation Leadership Team (FLD) now ensures that the federation’s decision-making is mainly led by countries. While the international level still holds certain powers (e.g. CEO will nominate up to 30% of the members and provide leadership and guidance, countries that will not develop into affiliates will remain under the management of the International Secretariat), there is a clear commitment to decentralisation. The FLT also creates and mandates International Platforms from each strategic objective in the International Strategy. The International Leadership Team (ILP), on the other hand, will provide leadership to enable ActionAid to optimise use of capacity from and between countries.

These restructuring processes were accompanied by reduction of staff in the International Secretariat which is both due to (i) the intention to move to the countries directly as well as to (ii) a decrease in overall income by 4% in comparison to 2013. Can these steps be expected to increase the ratio of programme to total expenditure (an issue raised previously by the Panel)?

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### PERFORMANCE INDICATORS

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<td>NGO2 Complaints Handling Process</td>
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ActionAid explains the challenge of comparable data across the federation (e.g. high number of complaints reported in ActionAid Italy) because there are contextual differences in understanding complaints, their severity and effect on the organisation. This challenge drives ActionAid’s efforts to combine complaints response and whistleblower policies into one framework. This will serve as guidance for all members but they can develop their own country-specific national policy. It is suggested to also embrace constructive feedback as a positive way to improve ActionAid’s work and to frame the new policy in this rather engaging tone.

The Panel supports and looks forward to this progress – in particular also to what action was taken to address / resolve complaints since the level of response is even more crucial than figures of received complaints. ActionAid is also encouraged to provide information on the implementation of national policies at the 12 country offices which did not have mechanism in place at the time of the last report. While recognising the different standards used by AA members in logging complaints, in the Panel’s phone conversation with the Deputy ED, they understood that he intended to look further into the particularly high level of complaints in Italy and two other countries; is there anything further on this?

**NGO4 & LA13**

**Diversity within governance, staff and programme cycle**

Addressed

The Panel appreciates that ActionAid is aware of current weaknesses and that they discuss this area at senior level (e.g. International Board and Governance & Board Development committee). It was decided that staff diversity data at the International Secretariat level will be collected from 2017 onwards; diversity data across the federation will have to follow at a later stage. The Panel would be interested to know why it is so challenging to gather data on staff diversity. Are there any organisational improvement targets in place? Managing diversity on the governance level well can also be seen as a role model for AA members.

Moreover, the Panel looks forward to better systematised and recorded data from ActionAid’s programmes’ diversity practice (e.g. which people are potentially excluded from their work due to disability, ethnic minority, illiteracy etc.).

**NGO5**

**Organisation-wide quality control of advocacy standards**

Addressed

ActionAid described a rigorous clearance process in their 2013 report. However, representatives of the Panel and ActionAid’s Deputy Chief Executive discussed the practical issue around international monitoring of the advocacy and campaigning of members / country offices.

While it is understood that contextual differences exist, it is also appreciated that ActionAid streamlines the process of reaching agreements with members on policy positions and related advocacy activities to ensure coherence and quality control across the federation. In the mentioned conversation, ActionAid informed the Panel about a new global Policy and Campaigns Team whose responsibility it is to determine policy positions with more input from national level, and ensure coherence in the policy positions across the federation. The Panel looks forward to hearing more about this in the next full report.

**SO4**

**Anti-corruption Incidents and Actions Taken in Response**

Fully addressed
ActionAid describes three cases of corruption that appeared in country offices in Guatemala, Tanzania and Myanmar. Amounts of misspent money were recovered/demanded back, staff members dismissed, and controls around procurement strengthened. Have these incidents been detected via ActionAid’s Anti-corruption and Anti-Bribery Policy, i.e. has its revision led to more identification in practice? How have these cases been communicated to other offices as lessons learnt? Was there a refinement of the policy in regard to the understanding/classification of "corruption"?