

Feedback from the Independent Review Panel

Review Round March 2016

14 April 2016

Dear Muhammad Musa,

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 BRAC International

BRAC International's third accountability report is regarded as overall good and comprehensive, providing impressive figures of their organisation, diversified programme activities and processes in place.

While improvements are positively noted, the report still very much focusses on describing processes of accountability. In order to provide a full picture, it is essential to also assess the *effectiveness* of these processes: Are BRAC's policies well known by staff and truly applied in practice? How does BRAC evaluate that training is not just provided, but has the intended positive effects? How have feedback systems changed important management or strategic decisions? The Panel would like to see in-depth analysis of the positive impact BRAC's accountability processes have in practice, demonstrating the linkages as well as capturing emerging lessons for programming. The Panel is still not clear about aspects of BRAC governance, especially regarding the General Body which elects the governing boards. BRAC is undoubtedly a large and complex organisation, especially given its variety of programmes and social enterprises, and the governance and accountability provisions for the various elements, and the overall responsibility of the top governance structures should be more clearly described. From a strategic and **institutional commitment** point of view, BRAC is encouraged to clarify how accountability is essential to achieving BRAC's mission.

BRAC's meaningful training of its workforce (LA10) as well as annual appraisals to 100% of employees and BRAC's Performance Management System (LA12) are again very commendable. It is also positively noted that BRAC has a very high frequency of face-to-face meetings with the communities and individuals, which serve to ensure BRAC's work is continuously shaped by the interests of the poor. This bottom-up approach and big investment in social accountability are highly praiseworthy. While BRAC took on board some previous Panel recommendations and provided more clarification in this report (e.g. resolution of stakeholder complaints in NGO9 or external remuneration in 4.5), shortcomings remain in areas such as **evidence** regarding the feedback and complaints mechanism (NGO2), advocacy (NGO5) or cooperation with other actors (NGO6). The Panel would be interested to learn more about potential constraints in implementing recommendations. Moreover, many passages are copied from the previous report (e.g. 4.10, SO1, SO3 and SO4) even where the Panel asked for more information.

The Panel has again captured major areas for improvement in the **Improvement Analysis**: Gender (NGO4 & LA13), environmental sustainability (EN16, EN18, EN26); evaluation of the Governing Body (4.10); and figures of corruption incidents and evidence for successful resolution (SO3, SO4). We look forward to the progress that BRAC has promised to demonstrate in their 2015 report.

It is sometimes not clear which information relates to BRAC International or BRAC Bangladesh. Moreover, the supplementary documents provided (annual report and financial statement) only address BRAC Bangladesh, not BRAC International, which is the scope of the Charter submission.

BRAC has a sub-page on Financials and External Audits where it refers to the INGO Accountability Charter and links to BRAC's reports on the Charter website ([here](#)). However, it would be very much appreciated if BRAC also prominently placed the **Charter logo** on their website. Only if people know what BRAC has committed to, can they hold your organisation to account. Moreover, 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.

Finally, the Panel would like to offer a bilateral conversation with BRAC's senior management to identify ways in which the Charter Secretariat and Panel can help BRAC to meet their accountability obligations.

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. We are also available for bilateral conversations with Members' senior leadership team and look always forward to hearing your views.

Yours sincerely,



Louise James · Michael Röska · Jane Kiragu



Rhonda Chapman · John Clark · Saroeun Soeung

BRAC International

Review Round March 2016 Cover Note on Accountability Report 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 from BRAC's Founder and Chairperson, Sir Fazle Hasan Abed, provides interesting information about BRAC's recent achievements as well as mindful reflection on their shortcomings.</p> <p>However, as requested in the Panel's last feedback letter, the opening statement is intended to focus on how accountability is essential to achieving BRAC's mission. How will strong accountability help BRAC achieve better impact? How can accountability optimise BRAC's tools to support a more enabling environment? How do accountability practices shape BRAC's relations with donors? How is BRAC accountable to direct beneficiaries beyond programmes? Once the strategic importance of accountability is recognised: How does this translate into clear consequences for BRAC's programming, finance, human resource policies, advocacy etc.</p> <p>The Panel is impressed that BRAC is strengthening its financial sustainability, especially by establishing for-profit activities – the proceeds of which presumably all go into BRAC's programme work – and would like to ask the ED how easy it is to balance the different cultures that may be needed for success in both the for-profit and charitable realms? The Panel would also like to hear the ED's assessment of the current policy environment for NGOs in Bangladesh and other BRAC countries and does this spur or deter attention to governance by BRAC and other NGOs.</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 report provides again relevant information on its operational structure, sections and divisions. Graphical overviews are displayed in the annex (pages 46-48).</p> <p>The report provides little information about the social enterprises, stating that these "are not subsidiaries of BRAC" – in which case the Panel would like to know who owns these enterprises? It is recognised that some information is provided on enterprises and investments under 2.2 (page 3) and on legal registrations of country offices under 2.6 (page 7).</p>
2.4 – 2.5	<p>Headquarter location / Number of countries</p>

	<i>Fully addressed</i>
2.6	<p>Nature of ownership <i>Fully addressed</i></p> <p>The Panel acknowledges BRAC’s diversified funding base and their self-sustainable social business model. This report provides clarification that 50% of surpluses from their social enterprises finances BRAC’s development programmes’ budget. 10% to 20% of the surplus from the microfinance operations has been used to develop livelihood of microfinance beneficiaries. How does BRAC ensure that their accountability commitments are also upheld in their for-profit enterprises? Similarly, the report does not address BRAC UK and BRAC USA and the Panel does not fully understand this omission. Could future reports cover all affiliates?</p>
2.7	<p>Target audience <i>Fully addressed</i></p>
2.8	<p>Scale of organisation <i>Fully addressed</i></p> <p>Impressive and relevant information about the scale of the organisation is given. In addition to 115,117 staff globally in 2014, 105,736 health workers have voluntarily supported BRAC activities.</p> <p>The social enterprises’ asset, liability, income and expenditure are listed separately (page 9). Investment income is indicated as 8,496,041 USD.</p>
2.9	<p>Significant changes <i>Fully addressed</i></p> <p>This section provides relevant updates on changes in regard to BRAC’s size, organisational structure and legal status. New policies and programmes, as also described here, should rather be integrated into the content related indicators.</p>
2.10	<p>Awards received <i>Fully addressed</i></p> <p>BRAC is again commended for having received numerous awards in 2014.</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>It positively noted that the Executive Management Council and relevant stakeholders gave their inputs for this report. How has this process of compiling information for the Charter report raised more awareness and ownership for the Charter commitments among staff? The Panel recommends 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</p>

	<p>devise an improvement plan to ensure that their recommendations are addressed in the next report.</p> <p>Finally, it is similarly important to widely share the accountability report and Panel's feedback internally and externally to ensure stakeholders know what BRAC commits to and how it has progressed against these commitments. What system does BRAC have in place to collect and store information? With reference to improving the external benefits of this reporting, the example of Educo's executive summary of their 2014 report offers a user-friendly report aggregation, which may be of interest.</p>
3.6	<p>Report boundary <i>Fully addressed</i></p> <p>The report does not contain information about the two independent charities BRAC UK and BRAC USA because they are not implementing any programme for BRAC. In some places it is not apparent whether the report refers to BRAC International or just BRAC Bangladesh; for example the annexes provided just concern BRAC Bangladesh. Could future reports cover all affiliates?</p>
3.7	<p>Specific limitations <i>Fully addressed</i></p> <p>Concerning any specific material limitations of the scope or boundary of this report, BRAC states that this report does not provide any information on financially profitable branches of the organisation in socially responsible areas – but this can be accessed via BRAC's website and the annual report. How does BRAC ensure that their accountability commitments are complied with in the for-profit entities? How is a charitable culture optimally balanced with for-profit approaches?</p>
3.8	<p>Basis for reporting <i>Fully addressed</i></p> <p>BRAC states that this indicator is not applicable to them because BRAC enterprises are not subsidiaries. The Panel asks for a description of the ownership of these enterprises and their relationship to BRAC and BRAC International. BRAC is encouraged to demonstrate that they have systematic assurance that all entities comply with the Charter commitments made at the international level under the BRAC brand.</p>
3.10 – 3.11	<p>Changes in reporting parameters <i>n/a</i></p>
3.12	<p>Reference table <i>n/a</i></p>
IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	<p>Governance structure <i>Partially addressed</i></p> <p>The report provides again relevant information on BRAC's and BRAC International's governance structure (see also the organogram on page 46). Responsibilities and committees of the two Governing Bodies and BRAC's General Body are described. Even though the Panel raised the same issue on</p>

	<p>the last report, it is still not clear who the 29 members of the <i>General Body</i> are, how they are appointed, the term limits and rotation of these members, and how they are represented with regard to voting rights in the general body – especially in relation to the selection of the two 10-member governing bodies. BRAC’s different levels of authority are presented including their branch management. The Panel looks forward to the development of the web-based risk management system.</p> <p>Moreover, the Panel notes again that it is overall sufficient to provide this information once for the entire report. Please do not repeat the same information other sections of the report (e.g. 2.3) to ensure conciseness.</p>
4.2 – 4.3	<p><i>Division of power between the governance body and management / Independence of Board Directors</i> Fully addressed</p>
4.4	<p><i>Feedback from internal stakeholders</i> Addressed</p> <p>As in previous years, the answer provides a comprehensive overview of the different ways that BRAC receives direction from internal stakeholders. While this is a solid process, the Panel requests evidence in the next report that this engagement is indeed meaningful, two-way and has led to changes in decision-making. How is feedback <i>actually</i> addressed in governing bodies?</p>
4.5	<p><i>Compensation for members of highest governance body</i> Addressed</p> <p>The report states that all members of the Governing Body are unpaid non-executives. A public link to the mentioned pay scale for management and executives and to BRAC’s Human Resource Policies and Procedures (HRPP) would be helpful – especially in regard to departing staff.</p>
4.6	<p><i>Conflicts of interests</i> Partially addressed</p> <p>This answer repeats information already provided in previous reports but does not elaborate <i>how</i> BRAC ensures that the Governing Body remains independent from governments, political parties or the business sector. It is interesting to know that “generally their backgrounds were not affected for taking decisions for BRAC”; however, is there a conflict of interest policy or published registers of interest for the Governing Body?</p>
4.10	<p><i>Process to support highest governance body’s own performance</i> Partially addressed</p> <p>This is the same answer as in the last report and BRAC describes procedures for the appointment and term limits of members of the Governing Body. However, the Panel would be interested to know how BRAC ensures that this body is optimally effective: E.g. is there a clear plan for competencies needed in this body and new members are sought accordingly? Are new members inducted to ensure they can work effectively? Does BRAC evaluate the body’s performance and if so, what were the results? What is the process for removing members of the Governing Body, should this be regarded necessary?</p>
4.12	<p><i>Social charters, principles or other initiatives to which the organisation</i></p>

	subscribes n/a
4.14	List of stakeholders Fully addressed
4.15	Basis for identification of stakeholders Fully addressed The answer provides similar information about the basis for identification and selection of BRAC's different stakeholder groups. As noted last year, more evidence that the processes are delivering optimal results would be interesting in the next report.

PERFORMANCE INDICATORS

I. Programme Effectiveness

NGO1	<p>Involvement of affected stakeholder groups Fully addressed</p> <p>BRAC outlines again the engagement of stakeholder groups into the programme design and how feedback is sought during the design and implementation of its programmes. The organisation can be commended for the frequency of face-to-face consultations and their independently working Monitoring Department which regularly checks on the service quality of programme delivery on a random basis. They provide interesting illustrations of meaningful engagement. However, a large part of the information provided is not addressing stakeholder involvement but rather an effective monitoring and evaluation process that should be covered under NGO3. The Panel urges BRAC for improvements in the next report.</p> <p>Written policies and procedures guide described matters and stakeholder feedback has been the reason for amendments of these policies in the past (e.g. reshaping programmes according to risk ranking). The Panel would welcome links to some of these policies in the next report.</p>
NGO2	<p>Mechanisms for feedback and complaints Partially addressed</p> <p>As in previous Panel feedbacks, BRAC's independent ombudsman is once again greatly appreciated. Evidence that the investigation unit has led to corrective actions against accused persons is provided. Are there any lessons learnt from the execution of the Ombudsman office and that of the investigation unit in terms of rooting BRAC's accountability culture? The Panel notes that the ombudsperson can investigate complaints he receives or initiate his own investigations on issues ranging from maladministration and abuse of power to corruption, negligence, and oppression. The Panel would be interested to hear more information about the number and nature of complaints received and how they were addressed. Would BRAC share the ombudsperson's report to the Governing Body (on confidential basis if required)? How is it determined which issues are handled by the ombudsperson and which by the Investigation Unit? The report variously refers to the Investigation Unit, the Departmental Investigation Unit and the Independent Monitoring & Investigation Unit – are these all the same? Please clarify. Moreover, some people on the ground might be reluctant to make complaints. Can submissions to the ombudsman be taken in confidence?</p>

	<p>For the next report, BRAC is encouraged to demonstrate evidence that continuous feedback has a meaningful effect on decision-making or strategic planning. How many complaints were received (beyond the 168 reported and resolved – see NGO9 – cases in Bangladesh), what kind of issues did these address and could they be satisfactorily resolved?</p>
<p>NGO3</p>	<p><i>Programme monitoring, evaluation and learning</i> <i>Addressed</i></p> <p>BRAC has both a programme internal monitoring and a separate monitoring department as part of BRAC’s internal control mechanism. Performance indicators are set by programmes and donors; the monitoring department conducts periodic analysis and prepares reports on the results. However, as mentioned by the Panel in previous years, the answer is neither very specific on how BRAC’s strategic objectives are translated into clear targets and indicators of success; nor how these are monitored (i.e. in which time frames and with which direct implications for strategic decision-making and budgeting). Are evaluation reports shared with a) stakeholders (in draft form, before finalising), b) donors, and c) the public?</p> <p>Finally, it would be good to have a clearer indication on the effects of BRAC’s work on the impressive number of people the organisation reached and how this has informed strategic decisions.</p>
<p>NGO4</p>	<p><i>Gender and diversity</i> <i>Partially addressed</i></p> <p>The answer provided is the same as in the previous year. Thus, the report includes very relevant information on the organisation’s “Gender Justice and Diversity (GJD) programme” which addresses discrimination and harassment based on sex, ethnicity, age, disability etc. Moreover, BRAC can be commended for including gender issues into programme through so-called Gender Focal Points (GFP).</p> <p>However, information on how other diversity factors besides gender are <i>generally</i> included in all programme work is missing. Moreover, the Panel would appreciate a link to the mentioned Gender Policy, Sexual Harassment Elimination Policy or Gender Policy Operational Guideline (GPOG). The Panel would like more information on the processes used and case-load of the Sexual Harassment Elimination Unit. Most importantly, the Panel would be interested to know if BRAC has set specific inclusion targets and measures progress against these targets – or alternatively how BRAC monitors positive results of the GJD programme.</p>
<p>NGO5</p>	<p><i>Advocacy positions and public awareness campaigns</i> <i>Partially addressed</i></p> <p>The answer is almost identical to the previous year, thus providing again interesting information on the plentiful areas of BRAC’s brave advocacy work covering issues such as the rights of women, children and the poor (e.g. community Popular Theatre Group for illiterates) or advocacy for social changes (see indicator 2.2 on page 4). However – as already addressed by the Panel in previous feedbacks – the question here is not on the topics and messages of BRAC’s advocacy work, but rather how BRAC ensures an accountable approach to advocacy work. What is BRAC’s role in advocacy work – i.e. advocating on</p>

	<p>behalf of people or empowering people to advocate for themselves? This also includes ensuring advocacy claims are based on robust evidence, adequately reflect the needs of people whom it speaks for, and that policies and practices ensure corrective action is taken where necessary. To what extent, for instance, has the Popular Theatre Group feedback been captured or advanced in BRAC's advocacy themes and messaging and/or received a policy or resource response by duty bearers on their claims?</p> <p>BRAC promised in the Improvement Analysis submitted along with this report that the required update will be provided in the 2015 report and the Panel looks very much forward to progress in this regard.</p>
NGO6	<p>Coordination with other actors <i>Partially addressed</i></p> <p>BRAC lists again a comprehensive overview of relevant partnerships. The organisation's strategy concretely requests to implement programmes in close collaboration with others. However, as shared in the last Panel feedback, it is not clear if BRAC systematically conducts a situational analysis when entering new projects to determine their fit purposes. What systems are in place to avoid duplication and which criteria are applied for choosing strategic partners, which optimally leverage BRAC's input? How does BRAC ensure that partners meet the same high standards of accountability?</p>
II. Financial Management	
NGO7	<p>Resource allocation <i>Addressed</i></p> <p>The report includes relevant information on expenditure per programme, solid audit processes in place and an overview of the different external auditors in BRAC offices. All latest audited accounts can be accessed on the website. However, information on standards applied across jurisdictions is missing. Moreover, how does the organisation ensure the effectiveness of this resource allocation in achieving BRAC's key strategic objectives?</p>
NGO8	<p>Sources of Funding <i>Fully addressed</i></p> <p>The report provides again very detailed information on BRAC's sources of funding – broken down by different donors and income streams as well as by different BRAC countries.</p>
III. Environmental Management	
EN16	<p>Greenhouse gas emissions of operations <i>Not addressed</i></p> <p>The report does not include any numbers on the organisation's greenhouse gas emissions; however, BRAC promised in the Improvement Analysis submitted along with this report that the required update will be provided in the 2015 report. The Panel suggests that BRAC starts by appointing a person responsible for this issue and reporting to the CEO. S/he should start by systematically identifying the largest environmental implications of BRAC and developing a suggestion on how to minimise these systematically over time. This plan should be reviewed, approved, and resourced by senior management.</p>

	<p>Other Charter Members have developed easy to use tools for this purpose that could be drawn upon: In light of actual overall achievements, the Panel suggests getting in touch with Greenpeace International and to learn from their newly implemented greenhouse gas emissions management tool Cloudapps Sustainability. This enables their country offices to receive detailed reports on their current and historic emissions and to receive a benchmark of their Environmental Performance against other offices. Another good organisation to look at in this regard is CBM who managed to set up an environmental management tracking system with very limited resources and good effect.</p>
EN18	<p>Initiatives to reduce emissions of operations <i>Partially addressed</i></p> <p>BRAC provides information on initiatives that do not reduce their emissions, but contribute to solar energy provision and recycled paper production through BRAC's green enterprises. The Panel would welcome a systematic approach as outlined above and looks forward to promised progress in the next report.</p>
EN26	<p>Initiatives to mitigate environmental impact of activities and services <i>Not addressed</i></p> <p>The Panel encourages BRAC to identify the main environmental impacts of their programmes, activities and projects. Is there a consistent approach to the reduction of these impacts? Further suggestions in this regard are provided under EN16 and in the Charter's Good Practice collection.</p>
<p>IV. Human Resource Management</p>	
LA1	<p>Size and composition of workforce <i>Fully addressed</i></p> <p>As in previous report, BRAC provides impressive numbers of staff broken down into different functions and countries. Whereas the importance of and investment in volunteers is stressed, actual figures of these are appreciated in the next report – or at least a ratio of employed staff versus volunteers if it is difficult to determine exact numbers.</p>
EC7	<p>Procedure for local hiring <i>Fully addressed</i></p> <p>BRAC provides again a comprehensive account of its preferences to hire local staff. Details of the hiring process and Human Resource Policies & Procedures (HRPP) are available online; staff breakdown of local and expatriate staff is provided in LA13.</p>
LA10	<p>Workforce training <i>Fully addressed</i></p> <p>BRAC is again commended for the significant and meaningful training of its staff, teachers and members, as well as for spending 3.6% of its total budget on training expenses in 2014. Nevertheless, the Panel would like to know how training needs are identified and how BRAC evaluates that training was actually successful.</p>
LA12	<p>Global talent management <i>Fully addressed</i></p> <p>BRAC can be again commended for providing annual appraisals to all employees (100%) in 2013. It is stated that the HR department assessed all job positions and matching job descriptions in 2014. It would be interesting to hear about results</p>

	<p>from this evaluation and how the new structure, to be implemented in 2015, will be changed.</p> <p>In relation to the response to LA1, the implementation of a Performance Management System (PMS), by which BRAC involves staff in improving organisational effectiveness accomplishing their mission and goals, is positively noted. More information if these mechanisms work well in practice would be welcome in the next report. How does BRAC ensure to have the right people qualified at the right time and place?</p>
LA13	<p><i>Diversity of workforce and governance bodies</i> <i>Partially addressed</i></p> <p>As in the previous year, BRAC provides detailed breakdowns in relation to gender, age and geographical background of its staff and governance body. However, it is noted that the gender balance within BRAC Bangladesh is much polarised in some job categories (e.g. less than 1% of teachers and only 8% of project staff are male whereas 75% of full time staff is male). Has BRAC set itself any targets for diversification in the future? Moreover, the age of BRAC's Governing Body is relatively high with 6 out of 10 members aged 70 years and older. Are there term limits for members of the highest governing body? Is there a succession plan in place to ensure good governance and sustainability of the governance body?</p> <p>The Panel encourages BRAC again to include other forms of diversity indicators (e.g. religious/ethnic minority groups or disability) in their next report.</p>
NGO9	<p><i>Mechanisms to raise grievances</i> <i>Fully addressed</i></p> <p>The answer provides information about the different steps how staff can raise grievances to management in line with solid HR policies. It is stated that all 168 cases received by the investigation unit in 2014 have been resolved satisfactorily. These cases include internal and external allegations against staff members, and other complaints – but it states that all cases were resolved by HR department. Thus, it is difficult to understand whether this unit is restricted to HR issues.</p>
V. Responsible Management of Impacts on Society	
SO1	<p><i>Managing your impact on local communities</i> <i>Partially addressed</i></p> <p>The answer provided is pretty much the same as in the previous year and demonstrates again BRAC's commitment to work very closely with communities. Interesting examples of community empowerment and human rights trainings on the ground are reported. It is positively noted that participation in BRAC's local community leaders' workshops has increased for the second year in a row (344,272 in 2014).</p> <p>However, more information on written policies or standing procedures on how <i>intended</i> and <i>unintended</i> effects of BRAC's entering and exiting a community are monitored and acted upon are required for the next report. What are BRAC's criteria for "betterment of communities"?</p>
SO3	<p><i>Anti-corruption practices</i> <i>Partially addressed</i></p>

	<p>As in the previous year, this answer covers anti-money-laundering, fraud, and combating financing of terrorism, but not the broader risks of corruption. Corruption is a huge and often underestimated risk of substantially undermining NGO impact and the social fabric of communities within which we work. BRAC is requested to provide a link to the policies in the next report.</p> <p>Moreover, it would be interesting to know if these policies are known by staff and if mentioned trainings have led to improvements in this regard: Has the Anti-Money Laundering Committee identified instances of bad or dubious practice and if so what steps were taken?</p>
SO4	<p><i>Actions taken in response of corruption incidents</i> <i>Partially addressed</i></p> <p>As in the previous year, BRAC provides a thorough overview of the different action steps taken in response to cases of corruption. Are these cases recorded or published? How many and what kind of incidents happened in 2014 and were they resolved?</p> <p>The Panel looks forward to the implementation of BRAC’s Standard Operating Procedure for Fraud Management, a developed standard fraud reporting system as well as an e-fraud management system in 2015.</p>
VI. Ethical Fundraising	
PR6	<p><i>Ethical fundraising and marketing communications</i> <i>Addressed</i></p> <p>BRAC provides the same answer as for 2013 and describes a sound approach to establish a proper screening process and guidelines for fruitful partnerships. All major donations are made public in the Audited Financial Statements.</p> <p>As highlighted last year, more information would be welcome on which fundraising standards BRAC follows. Furthermore, numbers of complaints directed towards BRAC in violating fundraising standards and the actions taken are missing.</p>