

Feedback from the Independent Review Panel Review Round November 2014

Berlin, 09 December 2014

Dear Thomas Hughes,

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 12 reports submitted for the fall 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) thorough 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 ARTICLE 19

ARTICLE 19's second accountability report is very good, comprehensive and has improved from the previous year. In terms of **institutional commitment** to accountability, the report provides convincing insights on the importance of accountability that guides the organisation's decision-making and strategic thinking. The organisation has important basic policy documents in place (e.g. Code of Conduct incl. whistle-blower protection for its employees, formal processes allowing staff to petition the Chair of the Board); however, the mentioned policies should be hyperlinked. Good **evidence** that policies work well in practice is provided in some areas and could be further improved in others.

The greatest **weakness** is still the lack of a fully functioning Complaints Handling Mechanism in place. This is a minimum requirement for Charter Membership and ARTICLE 19 is urgently requested to follow up on this. On the positive side, the organisation is commended for their overall stakeholder engagement (NGO1), a well-developed monitoring and evaluation system at the strategic and operational level (NGO3), and a clear demonstration which percentage of funding was used for which strategic goal (NGO7) which can all be seen as **Good Practice**.

ARTICLE 19 did not respond to EN26 (initiatives to mitigate environmental impacts of activities and services) and SO1 (impact on local communities). On the other hand, the organisation reported on a number of additional indicators (3.9, 3.13, 4.8) that are not mandatory for Charter Members but positively noted by the Panel.

As noted last year, all Charter Member organisations are requested to publish the Charter logo and a link to its website on their own websites. ARTICLE 19 could do so on their "finance and accountability" webpage ([here](#)).

New promises and progress on commitments made in earlier reports have been noticed. 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 "**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 also as a baseline for you to summarise progress made in these areas and covered in more detail in the full report. Please feel free to adjust and complement this analysis from your perspective.

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 10 January 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.

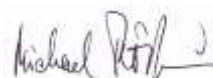
Yours sincerely,



Louise James



Wambui Kimathi



Michael Röskau



Jane Kiragu



Rhonda Chapman



John Clark



Saroeun Soeung

Review Round November 2014
Cover Note on Accountability Report

ARTICLE 19

Reporting period: Calendar year 2013

| PROFILE DISCLOSURES | |
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| I. Strategy and Analysis | |
| 1.1 | <p>Statement from the most senior decision-maker <i>Fully addressed</i></p> <p>The report's opening statement from ARTICLE 19's CEO provides a very convincing insight on the importance of accountability that guides the organisation's decision-making and strategic thinking. The Panel looks forward to being informed on strengthening the organisation's internal performance appraisal process and positively notes their helpful focus on accountability for performance.</p> |
| II. Organisational Profile | |
| 2.1 – 2.7 | <p>Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience <i>Fully addressed</i></p> <p>Relevant information is provided on the different indicators. However, some information is covered in incorrect indicators (e.g. governance structure belongs to 4.1, 4.3, and 4.10) and other information is unnecessarily repeated. Please ensure to take the new Charter Reporting Guidelines template (see here) for your next report.</p> |
| 2.8 | <p>Scale of organisation <i>Fully addressed</i></p> <p>ARTICLE 19 provides comparable data for the last three years. A continuous increase of staff, consultants, total income, net revenue, and total assets is to be observed. However, more information on annual expenditure, as well as some clarification on the difference between "income" and "net revenue" would have been appreciated.</p> |
| 2.9 – 2.10 | <p>Significant changes / 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>Fully addressed</i></p> <p>Further evidence on how the described process for defining the report's</p> |

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| | content and sharing the Panel's feedback has led to increased awareness of ARTICLE 19's accountability commitments across all functions and regions of the organisation is welcome in the next report. ARTICLE 19 is commended for drafting an action plan based on the Panel's feedback, which is signed off and monitored by the Deputy Executive Director. It will be interesting to hear in the next report what followed from there. |
| 3.6 – 3.7 | <p>Report boundary / Specific limitations <i>Fully addressed</i></p> <p>The Panel notes that ARTICLE 19 is a relatively small organisation with limited resources to ME+L that are necessary to report fully and comprehensively on every required indicator.</p> |
| 3.8 | <p>Basis for reporting <i>Addressed</i></p> <p>ARTICLE 19 is commended for incorporating the Charter accountability principles in the memorandums of understanding established between the international and regional offices. As last year, the Panel would like to know if this also constitutes the basis for its MoUs with the independent entities in Brazil and Mexico.</p> |
| 3.10 – 3.12 | <p>Reporting parameters / Reference table <i>Fully addressed</i></p> <p>A reference table is not necessary since ARTICLE 19 follows the usual GRI structure and numbering.</p> |
| IV. Mission, Values, Governance, and Stakeholder Engagement | |
| 4.1 | <p>Governance structure <i>Partially addressed</i></p> <p>Relevant information on ARTICLE 19's specific governance structure is provided. Some information was also given in 2.3. However, the Panel notes that information is missing on effective risk management. Interesting information is provided on how the global coordination of ARTICLE 19 entities across the world is strengthened to ensure the governance structure better supports overall impact and financial stability.</p> |
| 4.2 – 4.3 | <p>Division of power between the governance body and management / Independence of Board Directors <i>Fully addressed</i></p> |
| 4.4 | <p>Feedback from internal stakeholders <i>Partially addressed</i></p> <p>Information about mechanisms for internal stakeholders to provide recommendations is given. As mentioned in last year's feedback, it would be interesting to know for the next report if there is evidence that the exchange of information is meaningful and leads to positive management response. In particular, it would be useful to hear about results from the recent past.</p> |
| 4.5 | <p>Compensation for members of highest governance body <i>Fully addressed</i></p> |
| 4.6 | <p>Conflicts of interests</p> |

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| | <p><i>Fully addressed</i> The answer given is full and comprehensive, but more detail is needed; ARTICLE 19 is also encouraged to provide a link to the mentioned Conflict of Interest policy.</p> |
| 4.10 | <p>Process to support highest governance body's own performance <i>Fully addressed</i> Article 19 can be commended for completing an external governance review in 2013, which identified skills-gaps that led to the appointment of three new Board members. Further information is provided in 2.3.</p> |
| 4.12 | <p>Social charters, principles or other initiatives to which the organisation subscribes <i>Fully addressed</i></p> |
| 4.14 | <p>List of stakeholders <i>Fully addressed</i> ARTICLE 19 can be commended for providing a very detailed list of their stakeholders.</p> |
| 4.15 | <p>Basis for identification of stakeholders <i>Partially addressed</i> While the answer provided states the importance of working in partnerships with local groups, the Panel looks forward to progress in regard to developing a systematic approach of stakeholder identification and prioritisation planned for 2014. It would be appreciated if some clarification is given on why and how the organisation is engaged with its stakeholders.</p> |
| 4.16 – 4.17 | <p><i>Moved to NGO1.</i></p> |

| PERFORMANCE INDICATORS | |
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| I. Programme Effectiveness | |
| NGO1 | <p>Involvement of affected stakeholder groups <i>Fully addressed</i> ARTICLE 19 engages stakeholders in the whole project cycle management process, using different formats of involvement. Very interesting evidence is given on how the engagement processes have influenced projects and decision-making, e.g. introducing audio-visual materials when working with communities with high levels of illiteracy. This can be regarded as Good Practice in the way ARTICLE 19 provides evidence on how stakeholder involvement has very practically re-shaped the activities of the organisation. Overall, the answer would profit from being a little more succinct.</p> |
| NGO2 | <p>Mechanisms for feedback and complaints <i>Partially addressed</i> Parts of the organisation have formal processes in place that cover staff grievances or harassment at work. However, ARTICLE 19 still does not have a written policy on external Complaints Mechanisms in place although this is mandatory for all Charter Members. This is regarded as a key tool to improve the</p> |

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| | quality of CSO work. The Panel stresses again that this issue needs to be addressed urgently and appreciates that the organisation identifies this area for future development. As mentioned above, the organisation's Code of Conduct could be considered as good basis for such a tool. |
| NGO3 | <p>Programme monitoring, evaluation and learning</p> <p><i>Fully addressed</i></p> <p>The organisation is again commended for a well-developed monitoring and evaluation system at the strategic and operational level which has re-shaped management decisions and can be seen as Good Practice. More information would be welcome however on how the Results Based Management (RBM) system has allowed a better overview on overall impact and influenced specific decision-making.</p> |
| NGO4 | <p>Gender and diversity</p> <p><i>Fully addressed</i></p> <p>Relevant information is provided on how ARTICLE 19 addresses and embeds gender and other diversity issues into its work programmes and projects – especially into the design. Some evidence that women journalists' activities led to impact in this regard and feedback from training modules would be appreciated. ARTICLE 19 is invited to have a look at the outcome summary (see here online) of a Charter webinar on diversity and inclusion from May 2014, in particular on the discussion of analysing who might be potentially excluded.</p> |
| NGO5 | <p>Advocacy positions and public awareness campaigns</p> <p><i>Fully addressed</i></p> <p>The organisation addresses the relevant issues of this indicator although ARTICLE 19's formalised campaign planning, monitoring and evaluation processes (incl. corrective actions or exiting a campaign) are still in development. Evidence is provided how feedback shaped their Post-2015 campaign. The Panel appreciates that a more formalised approach on how campaigns and advocacy is managed to ensure stakeholder engagement, evidence based policies and responsible corrective action and exit strategies will play a key role in the next organisational strategy.</p> |
| NGO6 | <p>Coordination with other actors</p> <p><i>Partially addressed</i></p> <p>This indicator not only asks how to avoid duplication but also how to identify partners for leveraging <i>each other's</i> impact. Moreover, ARTICLE 19 is encouraged to provide more evidence that the current systems in place work well in practice and how it is ensured that partners meet the same high standards of accountability.</p> |
| II. Financial Management | |
| NGO7 | <p>Resource allocation</p> <p><i>Fully addressed</i></p> <p>ARTICLE 19 can be commended for clearly demonstrating which percentage of funding was used for which strategic goal. This particular information can be seen as Good Practice. However, more detailed information on effective allocation, the tracking of resources and robust internal/external controls should be given in the next report.</p> |

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| NGO8 | <p>Sources of Funding</p> <p>Addressed</p> <p>Information on expenditure is missing.</p> |
| III. Environmental Management | |
| EN16 | <p>Greenhouse gas emissions of operations</p> <p>Partially addressed</p> <p>ARTICLE 19 can be commended for having remarkably reduced their greenhouse gas emissions compared to 2012.</p> |
| EN18 | <p>Initiatives to reduce emissions of operations</p> <p>Fully addressed</p> <p>The Panel looks forward to information on planned further initiatives to reduce emissions, like offsetting or increased insulation.</p> |
| EN26 | <p>Initiatives to mitigate environmental impact of activities and services</p> <p>Not addressed</p> |
| IV. Human Resource Management | |
| LA1 | <p>Size and composition of workforce</p> <p>Fully addressed</p> |
| EC7 | <p>Procedure for local hiring</p> <p>Fully addressed</p> <p>ARTICLE 19 can be commended for having recruited all staff, including senior management, from the local community. A link to the mentioned Recruitment Policy would be appreciated in the next report.</p> |
| LA10 | <p>Workforce training</p> <p>Partially addressed</p> <p>ARTICLE 19's Training and Development Policy is currently being reviewed. It will define training, link it to the Performance Management Process and measure success. The Panel looks forward to being informed on progress in this regard. The organisation spent 0.2 % of its total income on training, all employees receive an induction when they start work with ARTICLE 19, but only 20% received external training.</p> |
| LA12 | <p>Global talent management</p> <p>Partially addressed</p> <p>So far 61.5% of the organisation's staff members have received personal development reviews in 2013. It is hoped that this number will turn close to 100% once all employees are with ARTICLE 19 for a full year. It is positively noted that ARTICLE 19 aims at developing their interns' capabilities and that 15% of the London office's workforce comes from ex-interns. However, global talent management is not only about interns. The question is rather how management and staff capabilities are anticipated on a global scale and people recruited and prepared accordingly. Finally, a link to the mentioned Performance Management Policy would be appreciated in the next report.</p> |
| LA13 | <p>Diversity of workforce and governance bodies</p> |

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| | <i>Fully addressed</i> |
| NGO9 | <p>Mechanisms to raise grievances</p> <p><i>Partially addressed</i></p> <p>The organisation's Code of conduct is a good basis for a complaints handling mechanism. ARTICLE 19 is encouraged to share their code of conduct policy in the next report. Moreover the Panel would welcome evidence that staff concerns raised were resolved satisfactorily.</p> |
| V. Responsible Management of Impacts on Society | |
| SO1 | <p>Managing your impact on local communities</p> <p><i>Not addressed</i></p> <p>ARTICLE 19 does not report on this indicator. The organisation stated in their last report that they were going to assess the impact of their work on local communities in 2013. Information on progress is strongly encouraged for the next report.</p> |
| SO3 | <p>Anti-corruption practices</p> <p><i>Addressed</i></p> <p>It has appreciated that the organisation plans to broaden their anti-corruption trainings although their set target (8% of staff) still seems insufficient. Information on how anti-corruption trainings have so far improved ARTICLE 19's resilience to fraud and bribery would be appreciated. The Panel would welcome a link to the mentioned anti-corruption and anti-bribery policy as well as to the developed training video in the next report. Overall, the anti-corruption training on the organisation's intranet can be considered to be very useful – evidence that staff is aware of it and that it works well in practice is however missing.</p> |
| SO4 | <p>Actions taken in response of corruption incidents</p> <p><i>Addressed</i></p> <p>In spite of the fact that there has not been any reported incident of corruption in 2013, ARTICLE 19 is encouraged to provide general information how such an incident would be published and followed up upon in theory.</p> |
| VI. Ethical Fundraising | |
| PR6 | <p>Ethical fundraising and marketing communications</p> <p><i>Partially addressed</i></p> <p>Even though funding is mainly secured from statutory sources and foundations rather than public marketing or promotional activities, it is still advisable to have policies in place ensuring that: needs are adequately described, the dignity of affected people is protected, funds are used in the designated way, etc. A more formalised approach would be welcomed by the Panel.</p> |