

## Feedback from the Independent Review Panel Review Round November 2014

Berlin, 09 December 2014

Dear Salil Shetty,

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 Amnesty International

Amnesty International's seventh report is again very good, accessible and comprehensive. Previous Panel feedback has been taken on board and this report demonstrates continuous progress and improvements of Amnesty's reporting over the last years.

A number of answers can be seen as **Good Practice** for other CSOs: A cross-functional strategic reporting process (3.5), the collection of Standard Action Reports which include all Charter standards from all entities (3.8), the *process* for meaningful stakeholder engagement (NGO1), a thorough advocacy approach (NGO5), and a sound procedure for local hiring (EC7).

As in previous years, the report provides strong **evidence**, several case studies and a great level of strongly-embedded **institutional commitment** to take accountability very serious in all Amnesty does. Nevertheless, the opening statement should be signed by Amnesty's most senior decision maker to underline the strategic importance of accountability to senior management. It is appreciated that Amnesty has a sub-page on the INGO Accountability Charter ([here](#)) and publishes all reports, Panel feedbacks and the Charter logo prominently.

Minor weaknesses include that Amnesty did not include information on indicator 4.12 (Social charters, principles or other initiatives to which the organisation subscribes) and room for improvement in regard to workforce training (LA10) and personal development reviews across national entities (LA12).

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.

Overall, Amnesty is commended for a very high level of transparency and accountability to its key stakeholders and the Panel suggests **reporting every two years against Charter commitments from now on**. In a very brief **interim report** the Panel would like to see only an updated CEO statement and information on progress highlighted by the Panel in the "Improvement Analysis".

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 Röska · Jane Kiragu



Rhonda Chapman · John Clark · Saroeun Soeung

**Review Round November 2014  
Cover Note on Accountability Report**

**Amnesty International**

*Reporting period: Calendar year 2013*

<b>PROFILE DISCLOSURES</b>	
<b>I. Strategy and Analysis</b>	
1.1	<p><b>Statement from the most senior decision-maker</b> <i>Fully addressed</i></p> <p>The report's opening statement provides a very strong commitment to accountability, understood as working more closely with the people they wish to serve and being accountable to them. Against this background, the significant devolution of power, culminating in the opening of four new Regional Offices in Africa and East Asia, is indeed a strong move towards greater accountability. The statement would, however, profit from a short explanation of what accountability exactly means to Amnesty and which role it plays in its overall theory of change.</p> <p>It is understood that regionalisation also poses challenges to globally coherent standards of accountability. It is therefore acknowledged that Amnesty has ensured Core Standards are being rolled out for consistent quality of governance, management, finance, HR and programming. It would be good to know if these have been informed by the INGO Charter Commitments to Accountability. Some information is given under 3.5 with regard to the Project Management Framework's revision being informed by the Charter.</p> <p>It is seen as a slight lack of institutional commitment to accountability that this statement has neither a name nor a signature is provided underneath this statement. Thus, Amnesty is strongly encouraged to change this in the future to underline its institutional commitment to accountability from the most senior decision maker in the organisation.</p>
<b>II. Organisational Profile</b>	
2.1 – 2.7	<p><b>Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience</b> <i>Fully addressed</i></p>
2.8	<p><b>Scale of organisation</b> <i>Fully addressed</i></p> <p>This answer provides very relevant, illustrative and comprehensive data on the scale of the organisation, including financial, HR and geographical figures as well as numbers of published reports and urgent actions. This makes it easily accessible for the reader to grasp the overall structure of Amnesty. The organisation took on last year's Panel feedback to provide numbers and changes over time. See also LA1 for more information.</p>
2.9	<p><b>Significant changes</b></p>

	<p><i>Fully addressed</i></p> <p>The answer clearly describes Amnesty’s continued transition to a distributed International Secretariat in 2013, with Regional Offices having opened in Dakar, Johannesburg, Nairobi and Hong Kong. The Panel looks forward to being informed on indicated further progress in the next report.</p>
2.10	<p><b>Awards received</b></p> <p><i>Fully addressed</i></p>
<b>III. Report Parameters</b>	
3.1 – 3.4	<p><b>Reporting period / Date of most recent report / Reporting Cycle / Contact person</b></p> <p><i>Fully addressed</i></p>
3.5	<p><b>Reporting process</b></p> <p><i>Fully addressed</i></p> <p>The answer provides very thorough insights on a comprehensive, cross functional process. So-called “INGO Charter indicator owners” including staff from headquarter, finance, governance, campaign, law and policy, growth and research assess Amnesty’s performance, reflecting on the Panel feedback, movement-wide reporting data (via Standard Action Reports) and their own expertise. They ensure it is incorporated into their current strategy process and informs management decisions in a timely manner. This was commended by the Panel.</p> <p>Evidence how Charter engagement has concretely informed reflection and decision-making in Amnesty would be interesting to hear in the next report. The Panel also looks forward to being informed about enhancing accountability systems at the regional level within the new distributed organisational model. Amnesty is commended for distributing the report internally and publishing it on its website. It would be interesting to hear if much feedback is provided by the audience. Overall, Amnesty’s answer to this indicator is seen as <b>Good Practice</b>.</p>
3.6 – 3.7	<p><b>Report boundary / Specific limitations</b></p> <p><i>Fully addressed</i></p>
3.8	<p><b>Basis for reporting</b></p> <p><i>Fully addressed</i></p> <p>This report covers the entire movement and Amnesty is again commended for a systematic, meaningful and comprehensive collection of information from its national entities including on accountability measures. Every Amnesty entity submits a Standard Action Report (SAR) in which all Charter standards were fully integrated in 2013. A SAR template was submitted along with the report. This year’s report is based on data from 66 SARs which accounts for over 90% of all entities. This response is highlighted as <b>Good Practice</b> by the Panel.</p>
3.10 – 3.12	<p><b>Reporting parameters</b></p> <p><i>Fully addressed</i></p>
<b>IV. Mission, Values, Governance, and Stakeholder Engagement</b>	

4.1	<p><b>Governance structure</b> <i>Fully addressed</i></p> <p>The answer provided gives a very comprehensive visualised account of Amnesty’s governance structure, the different responsibilities, levels of authority, an analysis of their process of improvement, and risk management in place. Effectiveness of Amnesty International’s global governance bodies is seen as dependent on the effectiveness of national governance bodies which in turn is supported through the implementation of Core Standards.</p> <p>The question here is, however, slightly broader than just on compliance with standards. It is also the question of how the overall governance structure optimally supports the achievement of the organisation’s goals. Against this background it is interesting that Amnesty also indicates that its’ very democratic governance structure, while underpinning its commitment to accountability, occasionally also leads to slow or inflexible decision-making. A review and proposal for reform has been commissioned and the Panel looks forward to hearing more on how the overall governance structure is reformed to better advance Amnesty’s mission in the future.</p>
4.2 – 4.3	<p><b>Division of power between the governance body and management / Independence of Board Directors</b> <i>Fully addressed</i></p>
4.4	<p><b>Feedback from internal stakeholders</b> <i>Fully addressed</i></p> <p>Relevant information on mechanisms for internal stakeholder recommendations is given. However last year, Amnesty was commended for giving very good evidence examples where internal stakeholder recommendations to the highest governance body have resulted in concrete management response. Including this kind of evidence again would have strengthened this answer.</p>
4.5	<p><b>Compensation for members of highest governance body</b> <i>Fully addressed</i></p> <p>A thorough process is described how the organisation’s salaries are being set. A direct link to the mentioned annual statutory accounts for more information on senior management remuneration would be appreciated in the next report.</p>
4.6	<p><b>Conflicts of interests</b> <i>Fully addressed</i></p> <p>Amnesty followed up on last year’s Panel feedback and submitted the conflict of interest and conflicts of duty policy along with their report. It applies to all decision-makers in the organisation and is part of leadership induction programmes. It would be good to have some evidence indicator that this policy is applied in practice and is well known among decision makers as well as assurance that it has led to the right consequences.</p>
4.10	<p><b>Process to support highest governance body’s own performance</b> <i>Fully addressed</i></p> <p>Sound evidence is provided illustrating how the evaluation of the International Board’s own performance (via a governance workshop) influenced decision-making, i.e. led to co-opting a member with useful skills in fundraising and marketing. Good information is provided on using a Competency Assessment</p>

	Framework to ensure the right mix of skills, experiences and diversity in the Board and support by the International Secretariat to further advance Board skills.
4.12	<b><i>Social charters, principles or other initiatives to which the organisation subscribes</i></b> <i>Addressed</i> As earlier described (see e.g. 4.1) Amnesty has developed so-called Core Standards in 2013.
4.14, 4.15	<b><i>List of stakeholders / Basis for identification of stakeholders</i></b> <i>Fully addressed</i>
4.16 – 4.17	<i>Moved to NGO1.</i>

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	<b><i>Involvement of affected stakeholder groups</i></b> <i>Fully addressed</i> The answer covers all relevant areas of stakeholder engagement and empowerment – strategic context, roles and responsibilities, different formats of involvement in the whole project cycle, and interesting evidence that Amnesty’s processes have led to positive results. Clear goals for participation in the situation analysis, planning, implementation and evaluation are set and monitored every six month against Key Performance Indicators. This process can be seen as <b>Good Practice</b> but results will have to underpin this assumption in further reports.  Challenges and room for improvements are honestly addressed, in particular that currently only 17% of national entities report to fully involve stakeholders in all stages of their programmes. The Panel looks forward to being informed on further progress of the organisation’s current assessments and reviews. The Panel observed with interest that the report’s language to describe stakeholder engagement is not as strongly based in rights-based wording as might be expected.
NGO2	<b><i>Mechanisms for feedback and complaints</i></b> <i>Fully addressed</i> Amnesty’s set of Complaint Guidelines was shared along with the report. The organisation provides a comprehensive account on the numbers and types of complaints for the last three years. In general, 99% of complaints could be resolved. This, however, begs further explanation. Were the complaints all agreed upon and remedied? Or were they just “treated” and dismissed? The Panel would be interested in evidence that overall assessment of received complaints has led to corrective decisions or improvements in the quality of Amnesty’s work.
NGO3	<b><i>Programme monitoring, evaluation and learning</i></b> <i>Fully addressed</i> The organisation has established a clear and robust monitoring and evaluation framework, capturing the “Dimensions of Change” it seeks to achieve and indicators for continuous success with regard to (i) internal process and (ii) impact

	<p>of their work. A quarterly monitoring dashboard captures performance on KPIs. This is complemented by external evaluations of strategic work areas as well as developing and monitoring of good management response. The new Project Management Framework captured some of the learnings – including a push for more collaborative M&amp;E with partners and rights-holders and evidence based decision-making. The Panel looks forward to progress report on this as well as results of the external evaluation on “Where are we having greater impact and why?” and tailored monitoring tools being rolled out at regional and national levels to increase ownership.</p>
NGO4	<p><b><i>Gender and diversity</i></b> <i>Fully addressed</i></p> <p>Amnesty followed up on last year’s Panel feedback and provides more details on their specific mechanisms to integrate gender and diversity into programmes and projects. Interesting examples of success are shared. Gender is mainstreamed throughout all project-planning via the Gender Integration Toolkit and trainings. Besides tackling gender issues, Amnesty is highly commended for taking on an authentically inclusive perspective incorporating dimensions such as age, indigenous people, minority groups, sexual orientation. The Panel acknowledges self-critical reflection on the fact that only 26% of Amnesty’s national entities report that they have measures or plans in this area. Amnesty concludes that gender and diversity <i>standards</i> are not sufficient to change practice. More training and management oversight is needed and the Panel looks forward to progress report in this area.</p>
NGO5	<p><b><i>Advocacy positions and public awareness campaigns</i></b> <i>Fully addressed</i></p> <p>Amnesty describes a very thorough process of taking into account what key stakeholders want and being accountable to them for (i) strategic choices of advocacy targets and (ii) formulation of positions. Staff, stakeholders and external experts are involved and implementation plans are specifically tailored to national circumstances and priorities within the global campaigns. Campaigns are firmly rooted in the organisations’ wider programmes, securing well informed work and some kind of sustainability after campaign exits which are planned from its inception. While responses to urgent situations are thorough but speedy, decisions on new or controversial policy positions are found in a very participatory process. A specific example is shared to illustrate the different steps.</p> <p>Overall, this is a very thorough approach and Amnesty can be commended for it. The answer is seen as <b>Good Practice</b> for other organisations. Concrete evidence on corrective actions taken due to input of a certain party within the process of formulating or implementing and advocacy position, would be interesting for the next report.</p>
NGO6	<p><b><i>Coordination with other actors</i></b> <i>Partially addressed</i></p> <p>Various examples illustrate how Amnesty’s processes to coordinate with other actors translate into decisions that improve the focus and target of their work, ensuring that they leverage powers with partners. However, currently only 11% of the entities involve partners in the complete project cycle and the organisation identifies the challenge to hold the whole movement to account for meaningful participation of other actors. Amnesty’s general understanding of partners could be described in more detail.</p>

	<p>A new form of partnership for Amnesty is that of affiliates, which constitutes very close relationships. Policies are aligned and they must also meet high standards which are monitored annually and capacity building is provided where improvement is needed. Exit strategies are considered at the start or partnerships ensuring they will be left strengthened and not weakened at the end. Full mutual evaluations are conducted at the end of a partnership. More information on outcomes of these mutual assessments would be welcome in the next report.</p>
<b>II. Financial Management</b>	
NGO7	<p><b>Resource allocation</b> <i>Fully addressed</i></p> <p>Information is provided on how processes in place ensure alignment of resource allocation with Amnesty's strategic goals. Only partial information is given on evidence of robust internal and external controls to minimise the risk of funds being misused. Moreover, Amnesty is encouraged to provide a link to its annual financial report. The Panel looks forward to more information on the roll out of a common financial reporting mechanism across the entire organisation – informing among other - the quarterly global management accounts with comments on material variances to budget. It is also interested in the outcomes of the planned review on how to improve the quality of collected data to better inform decisions.</p> <p>Finally, as stated in NGO8, Amnesty is commended for openly communicating the percentage of expenditure on fundraising, currently standing at 33% of overall expenditures.</p>
NGO8	<p><b>Sources of Funding</b> <i>Fully addressed</i></p> <p>The large majority of Amnesty's income comes from small, individual amounts given by members of the public.</p>
<b>III. Environmental Management</b>	
EN16	<p><b>Greenhouse gas emissions of operations</b> <i>Fully addressed</i></p> <p>As noted in previous reports, no national entities reported on their emissions. In the 2013 report it was 17 out of 26. The Panel looks forward to progress in the next report.</p> <p>Amnesty took on board the last Panel feedback and provides a succinct overview of developments over time. Office related emissions could be reduced and the increased emissions caused by travel in 2013 are mainly due to the global transition and to holding the International Council Meeting.</p>
EN18	<p><b>Initiatives to reduce emissions of operations</b> <i>Fully addressed</i></p> <p>The information provided is complete and clear and gives many very good examples of CO<sub>2</sub>-reducing initiatives as well as targets set for the future. Amnesty is commended for drafting an Environmental Management System (EMS) with policies and strategies for reducing energy, water, waste, and travel impact. Progress report on its implementation is welcome, as 56 out of 61 national entities reported that they have no environmental impact plan. In particular Amnesty is</p>

	again commended for its aspiration to linking sustainability objectives to all senior strategic and operational business decisions. If this is really put into practice it could be regarded as very Good Practice for other NGOs to follow.
EN26	<b><i>Initiatives to mitigate environmental impact of activities and services</i></b> <i>Fully addressed</i>
<b>IV. Human Resource Management</b>	
LA1	<b><i>Size and composition of workforce</i></b> <i>Fully addressed</i> The answer provides very comprehensive insights for the last three years in a graphical overview. It would be helpful to have some explanation on why the number of volunteers decreased from 7.722 in 2011 to 4.936 in 2013.
EC7	<b><i>Procedure for local hiring</i></b> <i>Fully addressed</i> The organisation reports that the impressive number of 95% of directors have been recruited locally. Amnesty can be furthermore commended for seriously aiming at <i>not</i> undermining the local public sector by their hiring practices via conducting local salary benchmarking exercises. This is seen as <b>Good Practice</b> .
LA10	<b><i>Workforce training</i></b> <i>Partially addressed</i> Similar to last year, a comprehensive and succinct overview is provided on Amnesty's training offers and the average hours of training that staff members receive. It would be interesting to know how training needs are systematically identified in regard to fulfilling Amnesty's strategic goals (especially in light of the current regionalisation), how the effectiveness of trainings is evaluated and which percentage of the overall administrative budget is invested into training the organisation's workforce, which is potentially more indicative than training hours. For example, virtual training videos on the intranet have been identified as very accessible and useful by other Charter Members.
LA12	<b><i>Global talent management</i></b> <i>Partially addressed</i> The Panel would be interested to know if there is a global talent development plan in place to ensure human resources capacities are in place or developed to support the global restructuring process and attainment of strategic goals. The appraisal completion rate for the International Headquarter was 89% in 2013, whereas it was only 45% across national entities. There seems to be no complete clarity as to how these differ from career development reviews received by 23% staff members across all entities. The Panel encourages Amnesty to improve this coverage and to provide evidence that their current mechanisms of developing staff globally as a key pre-requisite of achieving their strategic objectives work well in practice.
LA13	<b><i>Diversity of workforce and governance bodies</i></b> <i>Fully addressed</i> Comprehensive information is given on the diversity in governance bodies, equality and inclusion trainings, and a workforce survey from 2013 demonstrated statistical evidence that Amnesty's workforce is overall fairly divers in terms of gender, age and national origin. The number of (self-reported) disability is

	relatively low. The Panel looks forward to being informed how the Equality and Diversity policy put into place works in practice.
NGO9	<p><b><i>Mechanisms to raise grievances</i></b>  <i>Fully addressed</i></p> <p>The organisation has got substantial mechanisms for workforce feedback in place, e.g. a staff engagement survey and the “Global Minimum People Standards”. Amnesty followed up on promises made in last year’s GAP Analysis Table and introduced a Whistleblower Policy in 2013. A link to this policy would have been helpful for the reader. Furthermore, evidence on how these mechanisms positively informed management decisions would be welcome in the next report.</p>
<b>V. Responsible Management of Impacts on Society</b>	
SO1	<p><b><i>Managing your impact on local communities</i></b>  <i>Fully addressed</i></p> <p>The answer gives comprehensive information on how Amnesty assesses the intended and unintended consequences its interventions have on communities. The new Project Management Framework asks for participative decision making with affected communities from inception to evaluation of programme and advocacy work. The level of stakeholder engagement will be monitored every six months and the Panel looks forward to concrete outcomes.</p> <p>Amnesty can be commended for having a very thorough risk mitigation policy and process when involving stakeholders, as this may endanger them in politically hostile environments. The organisation states to have robust processes in place to monitor the increase of its presence in the Global South; however, no information if this has indeed improved relationships with local right-holders is given.</p>
SO3	<p><b><i>Anti-corruption practices</i></b>  <i>Fully addressed</i></p> <p>Taking on board last year’s Panel feedback, Amnesty assessed that there is only low staff awareness of the recently developed Anti-bribery and Corruption Policy. New trainings and awareness raising initiatives have therefore been introduced and will continue in 2014. The Panel looks forward to progress report.</p>
SO4	<p><b><i>Actions taken in response of corruption incidents</i></b>  <i>Fully addressed</i></p>
<b>VI. Ethical Fundraising</b>	
PR6	<p><b><i>Ethical fundraising and marketing communications</i></b>  <i>Fully addressed</i></p> <p>The answer provides information on a comprehensive approach towards ethical fundraising. It would have been helpful to provide links to the mentioned four global policies that guide Amnesty’s fundraising activities and most importantly evidence that they are well known by staff and followed in practice. The Panel looks forward to the planned evaluation of this in 2015.</p>