

Feedback from the Independent Review Panel Review Round November 2014

Berlin, 09 December 2014

Dear Robert Glasser,

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 CARE International Secretariat

In general, CARE International's accountability report is very good, comprehensive, and complete – especially for being their first report.

CARE's **institutional commitment** is underlined in a strong opening statement. CARE International only reports for the International Secretariat which is so far the only entity that is signed up for Charter membership. The Panel supports the fact that the International Secretariat will promote good accountability practice throughout the confederation and encourages membership for the whole organisation. It is not clear from the presentation in the report and on their website (see [here](#)) that only the International Secretariat is subject to Charter membership. Please clarify this information as long as CARE International cannot ensure to report for the full federation.

The report presents more on outputs, hardly to see the outcomes and impact levels. It was good to present numbers of reached-out audiences; however, the total number of audiences who benefit from the programme interventions in 2013 remains unclear. The report also may need to have a short explanation of counting the numbers, avoiding multiple counting.

A number of answers can be seen as **Good Practice** examples for other Charter Member organisations: Facilitating a workshop for the Secretariat's Senior Management Team and seriously engaging with other internal stakeholders to define the scope and content of their accountability report (3.5), the recently launched Program Information and Impact Reporting System (PIIRS) strengthening a culture of interconnected information and knowledge management throughout the confederation (NGO3), and annual surveys with their partners who rate CARE's effectiveness, impact and transparency (NGO6).

The report uses a number of illustrative and interesting examples as **evidence** of their procedures in place. Nevertheless, implementing more formalised policies (e.g. in the area of anti-corruption) is encouraged for the future. Weaknesses can be observed in the area of environmental sustainability and the Panel inspires CARE to track CO₂ emissions annually and compare data over time.

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.

To further improve CARE International's accountability, the Panel recommends placing the Charter logo on the organisation's website where it links to the Charter (see [here](#)). Finally, the Panel encourages CARE to think about the main audience of their Charter report to optimally reach this target group.

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**

CARE International

Reporting period: Fiscal year 01 July 2012 to 30 June 2013

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	<p>Statement from the most senior decision-maker <i>Fully addressed</i></p> <p>The Secretary General gives a strong statement on why accountability is of key strategic importance to achieving CARE's objectives. The preparedness to be held to account to intended and unintended consequences of their work, sharing information in a transparent way providing feedback loops for stakeholders, underline CARE's commitment.</p> <p>The Panel supports the fact that the International Secretariat will promote good accountability practice throughout the confederation and strongly encourages membership for the whole organisation.</p>
II. Organisational Profile	
2.1	<p>Name of organisation <i>Fully addressed</i></p>
2.2	<p>Primary activities <i>Fully addressed</i></p> <p>The answer given provides a good overview on CARE's primary activities.</p>
2.3 – 2.7	<p>Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience <i>Fully addressed</i></p> <p>CARE could elaborate a little more on their complex organisational structure including power relationships and which responsibility sits exactly at the global, national and local level in the next report.</p>
2.8	<p>Scale of organisation <i>Fully addressed</i></p> <p>CARE provides relevant financial information on the International Secretariat and the whole confederation. However, this indicator not only asks for financial figures but also for numbers of supporters and volunteers where relevant in order to provide an overall picture of the organisation's scale. It was also noted whether revolving funds and emergency respond funds is different from assets, or a part of it. Numbers of employees are provided under indicator LA1.</p>
2.9	<p>Significant changes <i>Fully addressed</i></p> <p>There were no relevant changes apart from the establishment of a European</p>

	Oversight Committee within the reporting period.
2.10	<p>Awards received n/a</p> <p>When collating information for this report, CARE was advised by the Charter Secretariat that indicator 2.10 would be deleted from the reporting template. Since this is not the case anymore, CARE is encouraged to include information on awards received in the reporting period for the next report.</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>Addressed</i></p> <p>CARE can be commended for facilitating a workshop for the Secretariat's Senior Management Team to define the scope and content of their accountability report. This can be seen as Good Practice.</p> <p>It would be interesting to further know a set of guidelines for monitoring, evaluation, and reporting including who within CARE is involved in which way to collate and edit the report and how you plan to use the Panel feedback to further mainstream accountability across all functions in the organisation.</p>
3.6 – 3.7	<p>Report boundary / Specific limitations <i>Fully addressed</i></p> <p>This year's report focuses on the Secretariat's structure and operations only while at the same time illustrating links to the broader confederation (e.g. coordination of CARE international policies, formulation of organisational standards). While this is a reasonable approach, especially for an organisation's first report, CARE is encouraged to present a clearer indication on how it ensures its Members also adhere and contribute to the achievement of the accountability commitments CARE has made at the Secretariat level. There is sometimes a slight inconsistency of coverage in regard to the global or federation level (e.g. workforce training) and the Panel would welcome more clarity in the next report.</p>
3.8	<p>Basis for reporting <i>Fully addressed</i></p>
3.10 – 3.11	<p>Significant changes n/a</p> <p>This is CARE's first accountability report.</p>
3.12	<p>Reference table n/a</p> <p>A referencing table is not necessary in CARE's case because the organisation sticks to the reporting template's order.</p>
3.13	<p>External assurance <i>Fully addressed</i></p> <p>It is appreciated that CARE plans to share the feedback to this report with</p>

	<p>CARE Members and invite their comments.</p> <p>For the future, it was decided by the Charter Board to delete this indicator from the reporting template because all Charter Members' reports are vetted by the Independent Review Panel anyways.</p>
IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	<p>Governance structure <i>Fully addressed</i></p> <p>The answer provides a very good and helpful overview of CARE's governance structure, including relevant committees and responsibilities. Do you have evidence that your risk assessments work well in practice? The next report should explain more on the level of authority resting with the local, national and global level, especially how each country office governs the relationship between the national and international levels.</p>
4.2	<p>Division of power between the governance body and management <i>Fully addressed</i></p> <p>The answer provides relevant information on the division of powers. Nonetheless, it would be interesting to know who evaluates the chief executive of both international and country levels. Furthermore, a link to the revised Code for CARE International would be appreciated in the next report.</p>
4.3	<p>Number and independence of Board Directors <i>Addressed</i></p> <p>It is understood that CARE's Board consists of 14 national CEOs and 14 Board Chairs of the national Care entities. The Panel would be interested to know how independence of the supervisory board and oversight of the management body is ensured if CEO Board Members are also allowed to vote.</p>
4.4	<p>Feedback from internal stakeholders <i>Partially addressed</i></p> <p>More specific evidence of meaningful feedback loops between internal stakeholders and the highest governance body would be welcome in the next report, e.g. how has this influenced the strategic agenda of CARE?</p>
4.5	<p>Compensation for highest governance body and senior managers <i>Fully addressed</i></p> <p>The answer provided states that independent Board Directors do not receive any compensation. More information on a thorough process for senior management salaries will be appreciated in the next report.</p>
4.6	<p>Conflicts of interests <i>Partially addressed</i></p> <p>Relevant information is provided on the independent selection of Board Members by CARE members. Nevertheless, the Panel encourages CARE to share more information on how potential conflicts of interests are identified and managed responsibly and how CARE ensures independence from governments, political parties or the business sector.</p>
4.10	<p>Process to support highest governance body's own performance</p>

	<p><i>Addressed</i></p> <p>The described self-assessment process for CARE International’s Board sounds good. For the next report, the Panel encourages CARE to provide results from this evaluation and to share how these improve the effectiveness of the Board. Moreover, information on procedures for the appointment, term limits, responsibilities etc. would be welcome.</p>
4.12	<p><i>Social charters, principles or other initiatives to which the organisation subscribes</i></p> <p><i>Fully addressed</i></p> <p>CARE International is involved in a large number of key networks/initiatives.</p>
4.14	<p><i>List of stakeholders</i></p> <p><i>Fully addressed</i></p> <p>However, the Panel would welcome more generic information about CARE’s stakeholders, especially on the people the organisation serves.</p>
4.15	<p><i>Basis for identification of stakeholders</i></p> <p><i>n/a</i></p> <p>The primary responsibility for overseeing stakeholder engagement remains at the level of CARE National Members rather than the International Secretariat.</p>
4.16 – 4.17	<p><i>Moved to NGO1.</i></p>

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	<p><i>Involvement of affected stakeholder groups</i></p> <p><i>Partially addressed</i></p> <p>The answer provides highly relevant information on CARE’s tools and formats used to ensure meaningful stakeholder involvement: Code of Conduct, Evaluation Policy, Information Disclosure Policy, Humanitarian Accountability Framework, “After Action Review” workshops, a “Rapid Accountability Review (RAR)”, Public Hearings at the local level, voluntary Advisory Boards etc. The Panel encourages CARE to describe how these processes work well in practice and to share some testimonials/evidence.</p>
NGO2	<p><i>Mechanisms for feedback and complaints</i></p> <p><i>Addressed</i></p> <p>CARE International set up a complaints system in 2011. The Secretariat received 13 complaints in the reporting period of which 10 could be resolved. The Panel would be interested to know what types of complaints these entailed, how the complaints were actually resolved, and if the complaints system is well known among staff members, partners and beneficiaries of both CARE International and country offices.</p>
NGO3	<p><i>Programme monitoring, evaluation and learning</i></p> <p><i>Fully addressed</i></p> <p>CARE’s Evaluation Policy places findings, lessons learned and external recommendations in the public domain. The recently launched Program</p>

	Information and Impact Reporting System (PIIRS) led to the dissemination of customised reports for each CARE member – strengthening a culture of interconnected information and knowledge management throughout the confederation. Both formats can be seen as Good Practice examples. The Panel would be interested in further evidence that MEL and the mentioned reports have led to positive management response.
NGO4	<p>Gender and diversity <i>Fully addressed</i></p> <p>CARE conducts needs assessments and regular monitoring to promote meaningful inclusion of people who may be excluded on the basis of gender, age or other area of diversity. It will be interesting to learn more about CARE's impact reports and how PIIRS (see NGO3) has helped to align the organisation's projects and programmes with their focus on the most marginalised people. The Panel looks forward to further information on the gender marker pilot for CARE's humanitarian programmes.</p>
NGO5	<p>Advocacy positions and public awareness campaigns <i>Partially addressed</i></p> <p>CARE names several tools and procedures in place that ensure that advocacy positions are respectful of people's dignity and coherent across the federation as well as evaluated at the end. A link to the Advocacy Sign-off Procedures would have helped in this regard. Moreover, information on corrective actions taken where appropriate and if CARE has a process in place to exit a campaign would be welcome in the next report.</p>
NGO6	<p>Coordination with other actors <i>Fully addressed</i></p> <p>The answer provides thorough information on CARE's different partners and their roles. The organisation carries out annual surveys with their partners who rate CARE's effectiveness, impact and transparency. The anonymous results are shared with all partners. Relevant outcomes would be welcome in the next report but these ex-post surveys, in particular on the complementary role of CARE to other partners, can be seen as Good Practice. The Panel would also be interested to know how CARE ensures how their partners are actually identified and that they also meet high standards of accountability.</p>
II. Financial Management	
NGO7	<p>Resource allocation <i>Fully addressed</i></p> <p>Full audited financial statements are available to the public upon request; a summary is published in the Annual Report. The Panel advises to link to the summary of CARE's financial statements in the next report. CARE has a consultant auditing their control system. It would be helpful to know of other forms of controls in place. The Panel encourages CARE to share more on how they track the use of resources including cash and in-kind contributions on the intended purposes.</p>
NGO8	<p>Sources of Funding <i>Addressed</i></p> <p>99% of CARE International's total income comes from CARE members. Which</p>

	are the 5 largest contributors among the CARE membership?
III. Environmental Management	
EN16	<p>Greenhouse gas emissions of operations <i>Partially addressed</i></p> <p>CARE composed a so-called “Green Team” in 2008 to carry out a carbon footprint inventory and measured its CO₂ emissions in 2008. It would be helpful to understand why another assessment has not been prioritised since. Moreover, it is highly encouraged to aggregate updated data and to track comparison over time. CARE is advised to have a look at e.g. Oxfam International’s last report (see here, p. 79-82) as a good example in this regard. The information on environmental data per staff member is very interesting.</p>
EN18	<p>Initiatives to reduce emissions of operations <i>Fully addressed</i></p> <p>CARE is seeking alternatives for air travel which is the highest contributor to the estimated emissions. Senior management is now discussing another inventory assessment. It would be interesting to see if the initiatives taken since 2008 have indeed helped to reduce CO₂ emissions.</p>
EN26	<p>Initiatives to mitigate environmental impact of activities and services <i>Addressed</i></p> <p>CARE is commended for having worked with almost 400,000 people to develop adaptation strategies to the effects of climate change in the reporting period. Nevertheless, advocacy on this issue would profit from engagement to reduce CARE’s CO₂ footprint. It would be helpful to identify the main environmental impacts of CARE’s activities and to share the results from learning within other parts of the organisation.</p>
IV. Human Resource Management	
LA1	<p>Size and composition of workforce <i>Fully addressed</i></p> <p>The answer provides a relevant break down of staff members according to where employees were <i>based</i> during the reporting period. Information on where staff is actually <i>from</i> is given in the response to LA13.</p>
EC7	<p>Procedure for local hiring <i>Fully addressed</i></p> <p>24% of CARE’s Secretariat are locally hired from Switzerland. The reference number to “5.16” is not clear for the reader.</p>
LA10	<p>Workforce training <i>Addressed</i></p> <p>Capacity building assessment is a component of the annual appraisal process for each staff member. However, CARE is encouraged to also evaluate overall training needs and to devote a certain percentage of the budget to fulfil them. More clarity on which data cover the International Secretariat and which come from federation members is appreciated in the next report.</p>
LA12	<p>Global talent management <i>Fully addressed</i></p>

	All staff are subject to formal annual appraisal reviews. It would be interesting to know if all employees have actually received such a performance review and if there is evidence that these appraisals work well in practice.
LA13	<p><i>Diversity of workforce and governance bodies</i> <i>Fully addressed</i></p> <p>79% of the Secretariat's employees are women. Furthermore, CARE's Board represents the diversity of the confederation. Gender and experience are the main categories for recommending candidates for officer level positions. It would be appreciated if the gender relation between senior and lower management was stated for comparison, too. Most importantly, CARE is asked to clarify why it currently does not see any importance in tracking other forms of diversity such as disability.</p>
NGO9	<p><i>Mechanisms to raise grievances</i> <i>Fully addressed</i></p> <p>CARE describes a solid process for staff to raise grievances within the organisation. They can be commended for the establishment of an elected non-management staff representative. The Panel looks forward to being informed if concerns raised were resolved in a satisfactory manner. The Panel is further interested to understand why the Secretary General is the last decision-maker in cases of grievances. Potentially this should be escalated up to the Highest Governance body – in particular if the Secretary General is him/herself involved.</p>
V. Responsible Management of Impacts on Society	
SO1	<p><i>Managing your impact on local communities</i> <i>Partially addressed</i></p> <p>It can be noted that even if CARE operates only for a few months and not directly, CARE's activities most probably also have indirect impacts (positive or negative) on local communities. The reference to 5.1 – 5.4 is presumably to NGO1 and NGO4 but should be clarified in future reports.</p>
SO3	<p><i>Anti-corruption practices</i> <i>Partially addressed</i></p> <p>CARE is encouraged to carry out risk analyses beyond their whistle-blower system. Moreover, strengthening anti-corruption mechanisms for the CARE confederation as a whole should be supported by effective policies in place at the Secretariat level. Do some national members already have formalised written procedures? The reference to 5.17 and 5.2 is not clear to the reader and should be clarified in future reports.</p>
SO4	<p><i>Actions taken in response of corruption incidents</i> <i>Partially addressed</i></p> <p>CARE states that there were no incidents of corruption recorded during the reporting period. The organisation is encouraged to self-critically reflect if this might be due to missing anti-corruption policies or if there were actually no incidents in practice. Moreover, in case of any future incidents of corruption or fraud, it would be appreciated if they were publicised in a transparent way beyond dealing with them internally at the Secretary General and Board Committee level.</p>

VI. Ethical Fundraising	
PR6	<p><i>Ethical fundraising and marketing communications</i> <i>Partially addressed</i></p> <p>The Secretariat itself is not directly involved in fundraising activities. However, it occasionally receives donations in which case follow-up “may” include meetings with donors to be able to verify the fund’s source and destination as appropriate. This sound rather vague and a clear process should be established in the near future. Moreover, it would be interesting to know if donations to the Secretariat are being publicised.</p>