

Feedback from the Independent Review Panel Review Round November 2014

Berlin, 09 December 2014

Dear Jeremy Wates,

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 European Environmental Bureau

European Environmental Bureau's (EEB) second accountability report is complete, comprehensive and definitely an improvement in comparison to their first report. In terms of role management, the report is clear and elaborate; engagement is robust.

Nevertheless, a lack of **evidence** is visible throughout the report. Descriptive statements will sound much more powerful if supported by practical examples which could be related to reporting indicators. In terms of **institutional commitment**, it is commendable that EEB is making attempts to spread awareness among its members about the work of the Charter. The organisation is strongly encouraged to highlight this commitment by publishing its accountability reports on its home page, as well as by using the Charter's logo – as it is requested of all Charter Members. The report fails to give an account of how the organisation esteems accountability as a strategic commitment. This report does not cover the activities of EEB's member organisations except insofar as they are relevant for to the functioning of EEB's activities at the EU level. It is highly recommended to develop assurance mechanisms that member organisations also comply with EEB's commitments to accountability.

A well-reasoned governance structure with leadership support for all processes engaging accountability is highly beneficial for the effective accomplishment of the organisation's mission and vision. Processes for recovering functionality (in case of EEB's Extranet facility) or optimising newly established mechanisms (e.g. mandatory complaints handling) need to be well intact. EEB is a small organisation and the Panel understands that it might be difficult to measure greenhouse gas emissions; however, as indicated by the Panel in their last feedback, being an environmental organisation, it is particularly important that EEB calculate their emissions (EN16). Moreover, EEB is strongly encouraged to implement gender and diversity procedures since these apply to *all* types of organisation (NGO4). Finally, the Panel advises the organisation to provide more details or links to the mentioned policies.

It is positively noted that EEB submitted an updated **GAP Analysis Table** along with its report which can be found at the end of this feedback letter. 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 Röska · Saroeun Soeung
 Rhonda Chapman · John Clark · Jane Kiragu

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

EUROPEAN ENVIRONMENTAL BUREAU

Reporting period: Calendar year 2013

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	<p>Statement from the most senior decision-maker <i>Addressed</i></p> <p>The report's opening statement by the Secretary General demonstrates moderate commitment to accountability and clear commitment on influencing the environmental policy of the European Union, which is commendable. EEB demonstrates why accountability is central to their theory of change. It is also commendable that EEB takes the responsibility to encourage and support their member organisations to respect high standards of accountability in their own operations, as well as to strengthen their own standards, hiring a Deputy Secretary General in support of this endeavour.</p> <p>It is also positively noted that the organisation's history of negotiating and implementing the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters is an incentive to keep their own standards of transparency and accountability under review and constantly seek to improve them.</p> <p>Nevertheless, it would be appreciated if more specific evidence were given on how accountability is relevant to EEB as a strategic commitment; why exactly is accountability important for the purpose of achieving organisational goals? How is accountability utilised among management decision-makers? The opening statement could have achieved more clarity through focusing on the specific organisational performance for the reporting year. It could also have included more information on concrete planning for the short, medium and long term strategy.</p>
II. Organisational Profile	
2.1 – 2.2	<p>Name of organisation / Primary activities <i>Fully addressed</i></p>
2.3	<p>Operational structure <i>Fully addressed</i></p> <p>The General Assembly elects a Board "comprising one representative of an EEB member organisation from each Member State where the EEB has one or more full member organisations"; with a total number of members and/or supporters of 137 member organisations this body becomes very large: please specifically explain if this governance structure optimally supports the effectiveness of your organisation and how, e.g. whether the work is accomplished in working groups, etc.</p>

2.4 – 2.6	Headquarter location / Number of countries / Nature of ownership <i>Fully addressed</i>
2.7	Target audience <i>Fully addressed</i>
2.8	Scale of organisation <i>Partially addressed</i> Similarly to the previous report, this one does not include information on the net revenues or scope and scale of activities. The report could profit from a more accessible representation of the overall organisational structure.
2.9 – 2.10	Significant changes / Awards received <i>Fully addressed</i> EEB took steps in 2013 to establish a new unit dedicated to global policy processes that support environmental sustainability. The Panel will keenly follow this progress and will assess developments in next accountability report.
III. Report Parameters	
3.1, 3.2	Reporting period / Date of most recent report <i>Fully addressed</i>
3.3	Reporting cycle <i>Addressed</i> EEB states to report on a bi-annual basis. However, all Charter Members are required to submit an accountability report on an <i>annual</i> basis, unless otherwise advised by the Independent Review Panel.
3.4	Contact person <i>Fully addressed</i>
3.5	Reporting process <i>Fully addressed</i> EEB has established an exemplary robust collective reporting process, in which, once finalised, the report will be disseminated to EEB members and a dialogue will remain open with them to encourage engagement with the Charter principles and to promote enhanced accountability in their own operations. It is recommended to highlight in the final version which parts were adjusted according to the Panel feedback. Yet, publishing your accountability reports on your organisation's website (as well as using the Charter's logo) will further acknowledge your commitment to accountability. The information session for Board members to raise awareness of the Charter is a very notable opportunity to initiate preparations for your next report.
3.6 – 3.7	Report boundary / Specific limitations <i>Fully addressed</i> The report does not attempt to cover the activities of the member organisations except insofar as they are relevant to the functioning of the EEB's activities at EU level.
3.8	Basis for reporting

	<p><i>Partially addressed</i></p> <p>Since formally associated entities have not reported in full, EEB does not have any systematic assurance that national and regional entities comply with the Charter accountability commitments. The Panel strongly supports developments in regard to EEB member organisations complying with the Charter.</p>
3.10 – 3.12	<p>Reporting parameters</p> <p><i>Fully addressed</i></p>
IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	<p>Governance structure</p> <p><i>Partially addressed</i></p> <p>This response covers EEB’s governance structure and a note is taken from the previous feedback to also explain committees under the highest governance body. As mentioned above in 2.3, the report will benefit from displaying evidence on how exactly this large governance structure (comprising one representative per EEB member) is effective in supporting and implementing the organisation’s goals; what structures and subcommittees are there below the Board? Moreover, EEB is encouraged to provide information if an effective risk management is in place that ensures compliance in the different jurisdictions; also, are the exact policy components in terms of the General Assembly – details are evident, but highlights are also important.</p>
4.2 – 4.3	<p>Division of power between the governance body and management / Independence of Board Directors</p> <p><i>Fully addressed</i></p> <p>EEB is commended for taking note from previous report and giving a thorough description on the divisions of power.</p>
4.4	<p>Feedback from internal stakeholders</p> <p><i>Fully addressed</i></p>
4.5	<p>Compensation for members of highest governance body</p> <p><i>Fully addressed</i></p> <p>The Panel will be looking forward to assess developments regarding EEB’s salary scale, which is currently under review with the aim to strike a balance between public expectations of not-for-profit organisations and the necessity to attract good personnel and senior staff.</p>
4.6	<p>Conflicts of interests</p> <p><i>Partially addressed</i></p> <p>EEB is strongly advised to either submit a copy of or link to the mentioned policy of vetting staff and governance representatives since the current answer does not provide sufficient details yet.</p>
4.10	<p>Process to support highest governance body’s own performance</p> <p><i>Partially addressed</i></p> <p>It is highly recommendable that EEB initiate a system to evaluate the performance of the highest governance body; a system which should clearly indicate progress and performance results in order to effectively support and</p>

	empower the individual's work and commitment. Moreover, simply stating that there is an internal policy in place that regulates appointments, term limits etc. is not sufficient in this regard. EEB is encouraged to either provide more details from this policy or directly link to it.
4.12	<i>Social charters, principles or other initiatives to which the organisation subscribes</i> <i>Fully addressed</i>
4.14, 4.15	<i>List of stakeholders / Basis for identification of stakeholders</i> <i>Fully addressed</i> There is very little reference to the private sector; what can be done (similarly to the Zero Mercury Campaign) in order to initiate dialogue with stakeholders? Is EEB prepared to talk if they can defuse industry federations?
4.16 – 4.17	<i>Moved to NGO1.</i>

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	<i>Involvement of affected stakeholder groups</i> <i>Addressed</i> The answer demonstrates good feedback culture, although not formalised. Similar to the previous report, this one focuses on the processes for involving external not so much as internal stakeholders and it still remains unclear which the exact stages of external stakeholder participation are, or how feedback from external stakeholders affected the decision-making process or reshaped policies and procedures. It is commendable that in 2013 EEB organised 26 meetings for Working Groups. In this regard, is there any particular evidence demonstrating sense of stakeholder ownership EEB could share? The thorough upgrade and improvement of the Extranet facility (which became partly operational in 2011 but is in little use since) is nevertheless considered a positive process, the development of which will be assessed by the Panel in EEB's next report.
NGO2	<i>Mechanisms for feedback and complaints</i> <i>Partially addressed</i> As in last report it is not sufficiently reported on potentially setting up a formal system to regulate external complaints. The EEB has not yet established and publicised a formal complaints mechanism and will make this a priority in the current reporting period, taking into account the requirements of the Charter. Fully functioning feedback and complaints handling mechanisms are a minimum standard for Charter membership and progress on this endeavour will be respectively evaluated by the Panel in due course. EEB is encouraged to contact other Charter Members that can assist in developing such mechanisms (e.g. Oxfam GB).
NGO3	<i>Programme monitoring, evaluation and learning</i> <i>Partially addressed</i> The answer given is quite broad. It is indicated that MEL occurs at staff level (meetings between each policy officer and their supervisor), at membership level

	(various working group meetings), and in annual activities' reports. However, there is no concrete system in place to entirely focus on monitoring and evaluating programmes, to respectively and specifically address burning issues in order to drive positive change. If current practices of implementing MEL are considered sufficient, it is advisable to provide evidence for positive management response in this regard.
NGO4	<p>Gender and diversity <i>Partially addressed</i></p> <p>As in their last report, EEB states that it takes gender and diversity into account when hiring or when organising conferences; however, it does not provide information on policies which the organisation has or follows, the tools used for analysis, or the actions taken to achieve gender and diversity goals. The organisation still considers that gender and diversity do not play a big role in programme and policy design and implementation. It is recommendable that EEB shares examples of how the organisation successfully implements a non-discrimination policy, what the outcomes of this policy are, and what specific targets it has set for the future in order to overcome ethnicity, disability, poverty, illiteracy, age, or gender challenges.</p>
NGO5	<p>Advocacy positions and public awareness campaigns <i>Addressed</i></p> <p>EEB is commended on its extensive and very useful online library. Similarly to its previous report, the organisation provides information as to how it formulates positions/campaigns and how it communicates them – it also notes efforts which are being made to improve this communication. However, it does not provide information on how the organisation ensures that its public criticisms are fair/accurate, how corrective actions are taken, or how it exits public awareness campaigns. On another note, engaging stakeholders in the formulation of policy positions should also include business to be heard – an aspect EEB could consider in its next report.</p>
NGO6	<p>Coordination with other actors <i>Partially addressed</i></p> <p>Equally to its last report, the organisation further recognises the need for coordination and gives concrete examples of how it collaborates with others; however, as previously noted, EEB does not provide information on internal policies or processes to prevent duplication, to promote learning from the work of other actors, or to coordinate with others. It is also mentioned that EEB works with partners that meet high standards of accountability – how is this statement evidenced?</p>
II. Financial Management	
NGO7	<p>Resource allocation <i>Partially addressed</i></p> <p>As in its last report, the organisation notes that the initial allocation of resources is made via the 2012 Annual General Meeting, but it does not provide information on the processes in place to track the use of resources (including cash and in-kind-contributions) or the standards used for this tracking system. How exactly does the organisation avoid the risk of misusing funds?</p>
NGO8	Sources of Funding

	<i>Fully addressed</i>
III. Environmental Management	
EN16	<p>Greenhouse gas emissions of operations <i>Not addressed</i> Similarly to its last report, the organisation states that the direct and indirect emissions are not calculated and it does not provide information as to whether it plans to calculate this. With EEB being an environmental organisation, it is particularly important that it calculates its emissions.</p>
EN18	<p>Initiatives to reduce emissions of operations <i>Addressed</i> EEB shares some common practices of how its offices attempt to reduce greenhouse gas emissions. In general, it aims to focus on more specific measures (which can practically measure reductions) in 2014 and 2015 by setting up a Staff led working group with the aim to strengthen and make more explicit internal policies and measures for assessing and limiting the organisation's ecological footprint, which is commendable. The Panel will follow up on this development in next report. EEB is encouraged to contact other Charter Members and CBM in particular who have found a system, which is cost efficient and easy to adopt.</p>
EN26	<p>Initiatives to mitigate environmental impact of activities and services <i>Partially addressed</i> The organisation shows some commitment to choosing future suppliers in reference to their sustainability policy, which is commendable. However, EEB confirms that it generally does not measure the main environmental impacts of the organisation's programmes, projects, or activities, nor does it conduct an environmental assessment prior to carrying out activities. Similarly to EN16, with EEB being an environmental organisation, it is recommendable to address this issue and initiate a more targeted approach to minimising environmental impacts in certain activities and services.</p>
EN29	<p>Significant environmental impacts of transporting products and transporting members of the workforce <i>Addressed</i> It is noted that EEB reports additionally to this indicator which is not mandatory for Charter Members. All the activities enlisted are fairly commendable; however, the achievements stated would be made more clear if EEB could provide those activities enlisted as measurements compared to previous years.</p>
IV. Human Resource Management	
LA1	<p>Size and composition of workforce <i>Fully addressed</i></p>
EC7	<p>Procedure for local hiring <i>Fully addressed</i></p>
NGO9	<p>Mechanisms to raise grievances <i>Partially addressed</i> More information on the stated exact policies that conform to relevant standards (what standards?) and are in accordance with EEB's values would be</p>

	<p>appreciated. How does EEB ensure that grievances raised with the respective supervisor are resolved satisfactorily? What other feedback systems in place are viable within EEB?</p>
LA10	<p>Workforce training <i>Addressed</i></p> <p>It is commendable that the organisation has undertaken to conduct a survey of staff training needs, which will be collectively evaluated on the basis of more effective individual, team, and organisational performance: rich advancement in building in-house capacities is demonstrated. The Panel will follow developments in EEB's commitment to devote four training days per year by 2016.</p>
LA12	<p>Global talent management <i>Partially addressed</i></p> <p>It would be further interesting to know if 100% of staff have received performance reviews with their supervisors in 2013 and if there is evidence that these development reviews work well in practice.</p>
LA13	<p>Diversity of workforce and governance bodies <i>Fully addressed</i></p> <p>HR policies in senior management are commended for achieving balance in the percentage of men and women: EEB is encouraged to share experience with others in working towards achieving gender balance.</p>
V. Responsible Management of Impacts on Society	
SO1	<p>Managing your impact on local communities <i>Partially addressed</i></p> <p>Some additional information and examples on how exactly EEB is responsible for and assesses a positive contribution to society, in terms of impact activities, as well as the types of positive feedback from partners received would be appreciated.</p>
SO3	<p>Anti-corruption practices <i>Addressed</i></p> <p>The organisation commendably took note from its previous report and has now delivered an anti-corruption policy in consultation with the staff and successfully adopted by the Board in 2014. However, EEB is asked to provide more details of or a direct link to this policy in the next report. Furthermore, the Panel would appreciate evidence that this policy is well known and used by staff.</p>
SO4	<p>Actions taken in response of corruption incidents <i>Partially addressed</i></p> <p>More information on potential mechanisms to record incidents of corruption and fraud <i>in case</i> they do occur would be helpful in regard to sustainable risk management.</p>
VI. Ethical Fundraising	
PR6	<p>Ethical fundraising and marketing communications <i>Fully addressed</i></p> <p>It is stated that EEB is "regularly critical" of Commission decisions; however, the response could still benefit from evidenced statements in support of this regular</p>

	criticism.
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European Environmental Bureau Gap Analysis Table – Areas of Commitments and Progress achieved

Accountability is a process of continuous improvement. Each year Charter Members in their accountability reports identify and prioritise areas for improvement and corrective actions they plan to take. As of reports submitted in 2014, Members are asked to capture these commitments in this Gap Analysis Table. The Independent Review Panel may suggest the Member to add further issues when reviewing the Member’s report. Each year following, the table shall be submitted along with the accountability report and will then be used as a basis to demonstrate progress. The table will be published on the website along with the accountability report and the feedback from the Panel.

NOTE: 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.

GRI – Performance Indicators	Reporting year 2011	2012	Reporting year 2013	Reporting year 2014
NGO1: Processes for involvement of affected stakeholder groups.		Report covering 2012 was not submitted	<p><i>“Assess mechanisms for stakeholder engagement in order to identify areas for improvement.”</i></p> <p><i>“Create a dynamic visual representation that shows where all EEB members are, Europe-wide plus locally within each Member State. This will facilitate understanding of the reach of EEB and support networking.”</i></p> <p><i>“Create a visually impactful representation of the EEB decision-making structure and mechanisms for interaction among Staff and members. This will facilitate understanding of EEB operations and promote greater levels of involvement.”</i></p> <p><i>“Send to all members the final version of the INGO report and ask them to commit to support the Charter accountability commitments in the period ahead.”</i></p> <p><i>“Enhance coordination with environmentally sustainable businesses, and relevant small and medium sized businesses to</i></p>	

			<p><i>build understanding, capacity and commitment to environmentally sustainable business models.”</i></p>	
NGO2: Mechanisms for feedback and complaints.	<p><i>“The EEB proposed in its Long Term Strategy 2010-2014 that the Board Members organise a yearly meeting in which it invites contact persons from the EEB member organisations... This process also allows stakeholders to influence and evaluate EEB policies and programs... The EEB did not hold such a meeting in 2011.”</i></p>		<p><i>“Survey member organisations on EEB performance to identify areas for improvement.”</i></p> <p><i>“Survey of EEB Staff on member engagement to identify areas for improvement.”</i></p> <p><i>“Establishment of a more formal and transparent complaints handling mechanism covering both internal and external complaints.”</i></p> <p><i>“Strategic Plan 2015-2020 to include overarching and detailed KPIs. Annual KPI assessment, evaluation, identification of lessons to be learned, and set of detailed written recommendations.”</i></p>	
NGO3: System for program monitoring, evaluation and learning.	<p><i>“One objective in the Long Term Strategy is to increase the participation of EEB members in the work of the EEB, in particular through EEB’s Working Groups. As part of increasing participation, each member organisation is invited to appoint a contact person. The contact person will receive general information and publications from EEB and will attend a yearly meeting with Board members where they can comment on the services delivered by the EEB, the relevance of EEB’s work to their own organisation’s work and ideas for the future focus of EEB’s work. This has yet to be implemented.”</i></p>		<p><i>“The EEB has established working groups to develop policy positions, provide fora for information exchange between the EEB and its members and plan concrete actions. These groups meet approximately twice a year. The groups are generally serviced by the responsible EEB Policy Officers, who hear the demands of the members and work to promote these demands by communicating with the European Institutions.”</i></p> <p><i>“MEL occurs at different levels. At staff level, regular meetings between each policy officer and his/her supervisor...At the level of the membership, the various working group meetings... occur typically twice a year...”</i></p> <p><i>“EB produces an activities report each year”</i></p>	
NGO4: Measures to integrate gender and diversity into program.			<p><i>“Target: 50% women speakers/moderators/ panelists at EEB events. More speaker diversity at EEB events.”</i></p> <p><i>“Enhanced coordination with EU-level gender, youth, development and diversity groups.”</i></p>	
NGO5: Advocacy.	<p><i>“One weakness that has been identified but is only now (June 2012) being addressed is the lack of</i></p>		<p><i>“The EEB provides general information on what it is doing under each of its work programme areas on its website and more specific</i></p>	

	<i>information about the working groups on the website. (...) it should be possible for the public to find out from the website which working groups exist, what they do and how to get more information. This is now being rectified. (...) The EEB has already identified a need for improvement in press work with the need for a faster response and linking its own work at the EU-level into the work of its members at a national level."</i>		<i>information on the extranet or closed e-mail lists of the members of the working group."</i>	
NGO6: Coordination with other actors			<i>"Enhance communication/ coordination/leadership with Green 10 and Spring Alliance"</i>	
NGO7: Resource allocation.			<i>"Increase reserves"</i>	
NGO8: Sources of funding.			<i>"Increase foundation funding and start to obtain appropriate private sector funding, while retaining current levels of EU LIFE funding"</i>	
EN18: Initiatives to reduce greenhouse gas emissions and reductions achieved.			<i>"Assessment of GHG impact of EEB activities, including office and EEB office equipment." "More comprehensive use of green suppliers." "Web-conferencing to be extended to replace some additional face to face meetings."</i>	
EN26: Initiatives to mitigate environmental impacts of activities and services.			<i>"Policy on green / fair trade suppliers to be further developed and applied." "Assess credentials of current suppliers and ask them for a copy of their sustainability policy."</i>	
EN29: Significant environmental impacts of transporting products and staff.			<i>"EEB transport guidelines to be reviewed." "Staff survey on journey to work (car, walk, bike or public transport) to be undertaken periodically."</i>	
LA10: Workforce training.	<i>"In 2011, we did not have a training policy but we have introduced one for 2012, albeit with a small</i>		<i>Target setting</i> <ul style="list-style-type: none"> • 16 hours year 1 	

	<i>budget.”</i>		<ul style="list-style-type: none"> • 24 hours year 2 • 32 hours year 3 	
LA13: Diversity within the organisation.			<i>Annual assessment of diversity (gender, age, nationality).</i>	
PR6: Ethical fundraising			<i>Ethical fundraising policy guidelines to be reviewed with regard to private sector funding.</i>	