

Feedback from the Independent Review Panel Review Round November 2014

Berlin, 09 December 2014

Dear Kumi Naidoo,

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 Greenpeace International

Generally, Greenpeace International's sixth accountability report is very good, concise, comprehensive, complete and dynamic. The report improved from the previous year and recent Panel feedback has clearly been taken into account.

As an advocacy organisation which places high value on decentralised and unpredictable campaigns, Greenpeace's organisational approach is different to a lot of Charter Members in development and humanitarian work. Thus, globally agreed, written policies, which all national organisations comply with in a comparable manner, are not the norm within Greenpeace. The organisation rather gives a lot of practical examples from the various national entities. Whereas this is very stimulating for the reader of this report, the organisation acknowledges itself – and is supported by the Panel in this regard - that several areas will profit from some more formalised global guidance without compromising its surge towards globally dispersed leadership. The Panel looks forward to progress report on this.

A great level of **institutional commitment** to accountability can be observed in the opening statement and throughout the report. Greenpeace decision making moves closer to its key stakeholders. The report covers both Greenpeace organisations worldwide (where possible and relevant) and Greenpeace International. It is appreciated that Charter membership and the Charter logo are published on the organisation's [website](#) and in the Annual Report.

The assessment of the International Board via thorough 360 evaluations which is shared with the Council and the Annual General Meeting (4.10) is regarded as **Good Practice**. The many promises made throughout the report are appreciated by the Panel which looks forward to progress in the next years (e.g. implementing a fully functioning complaints handling mechanism).


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, Greenpeace International 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 attached "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,

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Louise James · Wambui Kimathi · Michael Röska · Jane Kiragu

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Rhonda Chapman · John Clark · Saroeun Soeung

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

Greenpeace International

Reporting period: Calendar year 2013

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	<p>Statement from the most senior decision-maker <i>Fully addressed</i></p> <p>The statement by the CEO provides thought-provoking information about the overall vision and five main objectives of Greenpeace International. Although seeming to be a PR statement, a clear commitment to accountability and the Charter is given as an important way to <i>underpin</i> continuous improvement, the legitimacy and quality of their work. Accountability should however be more than just an <i>underpinning</i> factor. Taking into account what people want and continuously keeping in touch to understand how it could be delivered better, assigns a much more active role to accountability. Against this background, it would be good to understand from the next report what Greenpeace's exact understanding of accountability is and how it <i>drives</i> the achievement of Greenpeace's objectives, how it influences the allocation of scarce resources, attracting talented staff members or other senior decision-making.</p>
II. Organisational Profile	
2.1 – 2.6	<p>Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership <i>Fully addressed</i></p>
2.7	<p>Target audience <i>Fully addressed</i></p> <p>The answer provides relevant information. 4.14 provides more comprehensive data to this indicator, e.g. breaking down the different types of members and supporters.</p>
2.8	<p>Scale of organisation <i>Fully addressed</i></p> <p>Greenpeace provides a very honest account of its income and expenditure for 2013. Foreign exchange losses amounted to overall 8.9 million EUR. The organisation can be commended for increasing its income by 7% which is mainly due to increased fundraising efforts. Cost of fundraising stands at approximately 34% of overall income which is similar to Amnesty International and well argued for in this report – as a means to create a greater supporter and hence influence base. Visualisation and graphs as in last year's report might have helped the reader to grasp the information more quickly.</p>
2.9	<p>Significant changes in the organisational structure <i>Fully addressed</i></p> <p>Significant changes of Greenpeace's operating model to devolve power more</p>

	<p>globally are described. To ensure global coherence among more dispersed centres of leadership a global performance, accountability and learning (PAL) function was set up with organisation wide consensus on its role. The Panel commends Greenpeace for this move and would be interested to know more about the mandate and progress achieved by this unit in coming reports. The establishment of a Global Leadership Team (GLT) comprising 25% of national EDs and meeting monthly to <i>advise</i> the international ED has been put in place to support this globalised structure with guidance from across the movement, while keeping global focus. The globalisation effort is further supported by the establishment of three Global Committees advising strategy, the IED and enhancing global expertise. The Panel looks forward to staying informed on Greenpeace’s shift towards taking into <i>account</i> a more global perspective on key strategic decisions.</p>
2.10	<p>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>The report should be read alongside Greenpeace’s Annual Report (see here). It is appreciated that the Annual Report includes commitments to accountability, too, and that Charter membership and the logo are published (p.45). More evidence that the organisation’s year-end “Global Management and Accountability” process to collect the reporting data works well in practice, i.e. triggers organisational development, is welcome for the next report. It is recommended to get in touch with CARE International who demonstrated a strong reporting process in their last report. Moreover, the Panel looks forward to progress on expanding communication of the accountability report to other stakeholders.</p>
3.6 – 3.7	<p>Report boundary <i>Fully addressed</i></p> <p>This report covers both Greenpeace organisations worldwide (where relevant) and Greenpeace International. Please indicate criteria for <i>relevance</i> in the next report.</p>
3.8	<p>Basis for reporting on national entities, joint ventures and subsidiaries <i>Partially addressed</i></p> <p>The organisation does not report on subsidiaries which, however, would seem important in Greenpeace’s case. If NROs (National or Regional Organisations) have not reported in full, what systematic assurance does Greenpeace have to ensure that they comply with the overall accountability commitments? No report is given on joint ventures, subsidiaries and outsourced operations. Please list the most significant of these operations in the next report and indicate how Greenpeace’s general commitment to accountability is upheld.</p>

3.10 – 3.13	Reporting parameters <i>Fully addressed</i>
IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	Governance structure <i>Fully addressed</i> The report links to the organisation’s website for more detailed information about the governance structure. It is encouraged to mention in the next report how this specific structure optimally supports the achievements of Greenpeace’s mission in practice.
4.2	Division of power between the governance body and management <i>Fully addressed</i>
4.3.	Independence of Board Directors <i>Addressed</i> Please indicate in your next report the number of Members in Greenpeace International Board of Directors who are independent and/or non-executive. Since it is comprised of a Trustee from each NRO Board it is assumed that this is the case, but would be good to state explicitly.
4.4	Feedback from internal stakeholders <i>Fully addressed</i> Greenpeace staff can address the International Board through formal management channels and through their national Board represented at the AGM. This is a relatively indirect interaction practice. Wrongdoings can be addressed directly – a link to and information on the usage of the mentioned Whistleblower Policy would be helpful for the reader. Annual meetings between the work council (staff) and the Board take place, but they belong under NGO9 where grievance channels are reported. This indicator is more about the question of how well it is ensured that all staff is able to fully bring in their knowledge to improve Greenpeace’s work – also at the most senior decision-making body. As requested in last year’s Panel feedback, more information on how Greenpeace ensures that this is a meaningful dialogue and where this has triggered positive management response is welcome for the next report.
4.5	Compensation for members of highest governance body <i>Fully addressed</i> Greenpeace can be commended for breaking down the costs and/or salaries for Board Directors and/or senior management in a very transparent way. Information on how many people belong to the senior management team would have further improved the information on the overall payments to this body. The Board of Greenpeace International usually consists of seven Board Directors (see 4.3). However, this answer lists eight remunerations in 2013 which requires some further explanation.
4.6	Conflicts of interests <i>Fully addressed</i>

	Information on evidence that these policies work well in practice is appreciated in the next report.
4.10	<p>Process to support highest governance body's own performance <i>Addressed</i></p> <p>The International Board is assessed via thorough 360 evaluations which are shared with the Council and the Annual General Meeting. This can be considered Good Practice. However, the Panel critically notes that the Council, the highest governance body, is currently not being assessed. How are national and regional offices encouraged to evaluate their own Boards' performances? Please provide evidence that this practice has led to good decisions for improvement in the next report.</p>
4.12, 4.14	<p>Social charters, principles or other initiatives to which the organisation subscribes / List of stakeholders <i>Fully addressed</i></p>
4.15	<p>Basis for identification of stakeholders <i>Fully addressed</i></p> <p>It is appreciated that the importance of stakeholder analysis has been identified as a key element of Greenpeace's project design work and introduced into standardised project management training. The Panel would welcome evidence in the next report how this has improved Greenpeace work in practice.</p>
4.16 – 4.17	<i>Moved to NGO1.</i>

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	<p>Involvement of affected stakeholder groups <i>Addressed</i></p> <p>As in last year's report, Greenpeace states that it does not have an organisation-wide standardised process for the involvement of affected stakeholders due to its' very way of working which is based on unpredictability for opponents.</p> <p>The organisation does, however, provide interesting and illustrative examples of different formats, frequencies, and roles around stakeholder involvement. Strong evidence is provided in the cases of Germany and the UK but other parts are rather weak, only describing activities but no meaningful process of stakeholder engagement. Overall, the Panel would like to understand better how Greenpeace systematically does to engage stakeholders globally to frame campaigns and which directions does it give in this regard to national members.</p>
NGO2	<p>Mechanisms for feedback and complaints <i>Partially addressed</i></p> <p>It is reported and appreciated by the Panel that the number of national and regional offices (13 out of 20) which have a complaints handling monitoring in place has again increased from the previous year. Anecdotal evidence supports the different ways of monitoring complaints. Different types of complaints are</p>

	<p>divided into ‘Public’ and ‘Supporter Complaints’. Complaints are often around core values or due to “breach of values” which would be good to explain in more detail in the next report.</p> <p>The monitoring is rarely based on a written complaints handling policy giving stakeholders the right to complain and be attended to within a certain time frame etc. The Panel looks forward to Greenpeace’s Global Complaints System in 2014 and suggests that GPI provides NROs with some examples of good policy and practice to ensure coherence across the organisation – as a tool that provides valuable information for management decisions.</p>
NGO3	<p><i>Programme monitoring, evaluation and learning</i> <i>Partially addressed</i></p> <p>The Panel appreciates the strategic importance and establishment of a Performance Accountability and Learning (PAL) function within the organisation. PAL will develop tools to provide a more standardised approach to ME+L for national and regional offices. Most importantly it will bring together currently dispersed functions and better inform strategy, planning, monitoring and learning for both: programme and organisational aspect of work. More information on how results are publicised and how adjustments are put into effect is welcome for the next report.</p>
NGO4	<p><i>Gender and diversity</i> <i>Partially addressed</i></p> <p>The answer given states that diversity is seen as a quality driver for Greenpeace. Global Human Resources is currently developing a Diversity and Inclusion Policy and the Panel welcomes progress in this regard. Staff specifically dedicated to diversity and inclusion in some NROs is as much welcome as the Volunteer Lab on this issue. Evidence how this works in practice and informs good management decision is welcome for the next report. The examples from national offices do not really reflect any positive changes on diversity and they only specifically relate to gender and not to other forms of discrimination (ethnicity, religion, disability etc.). Has Greenpeace set itself particular targets? It is suggested to have a look at Plan International’s last accountability report (see here) as an exemplary answer in this regard.</p>
NGO5	<p><i>Advocacy positions and public awareness campaigns</i> <i>Partially addressed</i></p> <p>The answer given is exactly the same response as in the previous year. The broad framework within which policy positions are derived follows the hierarchical cascade from Greenpeace Mission (International Council), long term goals (International Board) and short term objectives (agreed in consultation with NROs). Information is provided about Greenpeace’s firm process to ensure a robust evidence base for its policy positions and due diligence on legal risks. It is less clear how key stakeholder positions are responsibly reflected beyond the fact that Greenpeace International agrees on an annual development plan with each NRO allowing for local priorities to be included in decision making. An example of such an annual development plan would be welcome in the next report. No information is provided on the organisation’s process to identify corrective adjustments of advocacy positions where these become relevant.</p>
NGO6	<p><i>Coordination with other actors</i></p>

	<p><i>Partially addressed</i></p> <p>Greenpeace stated last year that it does not have a standardised process for coordinating its activities with other actors because each campaign is distinct and national offices work autonomously. Even if this is the case, there are certain issues which will be similar for all advocacy work e.g. conducting a situational analysis to identify which other actors are already active in the same field or region, how to avoid duplication, how to best leverage each other's impact and how to ensure that partners meet high standards of accountability. A robust answer to this question should be provided in the next report. Nevertheless, respectable examples of alliances with other actors are included in the answer.</p>
II. Financial Management	
NGO7	<p><i>Resource allocation</i></p> <p><i>Addressed</i></p> <p>An informative summary of Greenpeace's Financial Statement 2013 is provided. The allocation to campaigns is demonstrated quite specifically. Information is missing, however, on the actual process to allocate expenditures and how the <i>effectiveness</i> of resource allocation is ensured in regard to achieving key strategic objectives and how the use of resources is tracked/controlled to minimise the risk of funds being misused. Are you taking steps to ensure that expenditure is in line with income in the coming years?</p>
NGO8	<p><i>Sources of Funding</i></p> <p><i>Fully addressed</i></p> <p>It is clear that substantial part of Greenpeace's funding comes from a very broad supporter base, safeguarding their independence also in a financial way.</p>
III. Environmental Management	
EN16	<p><i>Greenhouse gas emissions of operations</i></p> <p><i>Fully addressed</i></p> <p>Total emissions in 2013 were about the same as in 2012, despite a 7% rise in overall expenditure. More than a third of Greenpeace's greenhouse gas emissions continue to be due to their marine operations. Office electricity has increased due to increased global activities.</p>
EN18	<p><i>Initiatives to reduce emissions of operations</i></p> <p><i>Fully addressed</i></p> <p>Greenpeace can be commended for the formal approval of its organisation-wide Environmental Policy. Please provide a link to this policy in the next report. Communication of this policy to global staff has started and a minimum level Environmental Baseline will be established that all offices have to comply with. The Panel looks forward to results of the currently planned periodic reporting for assessment and implementing improvements. Evidence that the new EMS and its roll out triggers improved environmental sustainability of operations is welcome in the next report.</p>
EN26	<p><i>Initiatives to mitigate environmental impact of activities and services</i></p> <p><i>Fully addressed</i></p>
IV. Human Resource Management	

LA1	<p>Size and composition of workforce <i>Fully addressed</i> Very interesting and comprehensive information on the size and composition of the total workforce is given. There is an increase in gender diversity and a clear trend towards more permanent staff members being employed from the Global South. Unfortunately, some information in the first infographic is too small/blurry and difficult to read (i.e. breakdowns of Board members, staff age, management, and staff on permanent contract).</p>
EC7	<p>Procedure for local hiring <i>Partially addressed</i> The organisation states that it does not have specific policies in place for local hiring. It is evident that Greenpeace's current move to build and strengthen NROs particularly in the South will favour employment of staff from these regions. It is important, however, as part of our accountability to local communities to ensure that hiring practices do not undermine local labour markets, but rather build capacity also for local CSOs and the public sector. Please provide more information on how Greenpeace ensures this responsibility in the next report.</p>
LA10	<p>Workforce training <i>Partially addressed</i> Workforce training supports overall organisational development and is stated as one of the five objectives for internal change. The Panel looks forward to more information on the introduction of a Human Resources Information System (HRIS) and Learning and Development Programme over the next years. It is not overall important to state the total hours of training but rather to understand how Greenpeace determines the most eminent training needs, how much you invest on training as percentage of overall administrative expenditure and how you evidence that training is successful.</p>
LA12	<p>Global talent management <i>Partially addressed</i> The answer states that staff development is currently fairly ad-hoc in nature and therefore difficult to measure in terms of success. Nevertheless, it is key for success to have the right people in the right places and they need to be identified and nurtured for this to happen. It will be interesting to hear if the new Human Resource Information System will help to systematically identify future HR needs and support staff development according to strategic priorities. What does Greenpeace overall plan to address this critical issue in the future?</p>
LA13	<p>Diversity of workforce and governance bodies <i>Addressed</i> There are slightly more males appointed in management positions or as Board members. However, similar to NGO4, this indicator not only asks for gender relations but also for other areas of diversity such as age, minority groups, disabilities etc. Which groups of people should be represented in the organisation's governance bodies and workforce to improve its legitimacy and effectiveness? Indicate if Greenpeace is making progress in the right direction.</p>
NGO9	<p>Mechanisms to raise grievances <i>Partially addressed</i> There is presently no global grievance policy in place. However, under 4.4</p>

	<p>Greenpeace mentions the Works Council meeting the Highest Governance body annually. Presumably this is the body where staff grievances can be raised. The Panel welcomes the development of further global guidelines, in particular with a view to anti-harassment, and is interested to hear how this improves national and international processes. Moreover, how has the Whistleblower Policy been used in practice?</p>
V. Responsible Management of Impacts on Society	
SO1	<p><i>Managing your impact on local communities</i> <i>Addressed</i> Strong examples from different country offices show (mostly informal) impact assessments of their interventions on local communities. While this is important evidence of ongoing practice in some Greenpeace NROs, it would be important to also make this a more explicit requirement for all NROs. Greenpeace needs to be accountable to the communities which are significantly affected by its work. This necessitates as a minimum that continuous feedback is collected from affected communities in the new Feedback and Complaints system and is acted upon responsibly.</p>
SO3	<p><i>Anti-corruption practices</i> <i>Partially addressed</i> Greenpeace has a comprehensive anti-corruption policy in place that is adopted by 13 national and regional offices. Please provide a link to this policy in the next report and explain why so many other NROs have not yet adopted the policy. Is there evidence that this policy is well known and used by staff?</p>
SO4	<p><i>Actions taken in response of corruption incidents</i> <i>Partially addressed</i> The answer states that there is “in principle” no corruption as GPI has a zero tolerance policy on corruption. Does this mean that Greenpeace has asked all affiliates for this information and based on that there were actually no incidents in the reporting period?</p>
VI. Ethical Fundraising	
PR6	<p><i>Ethical fundraising and marketing communications</i> <i>Fully addressed</i> Greenpeace has its own fundraising policy which all offices are expected to adhere to. A link to this policy would be helpful for the reader of this report as well as evidence that it is well known and practiced by all staff. The Panel would be interested to know if the complaints received about fundraising (see NGO2, p.19) are reflected in the policy.</p>