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# **Amnesty International Independent Review Panel Feedback**

**Accountability Report 2017  
Review Round January 2019**



# Amnesty International

## Feedback from the Independent Review Panel

### Review Round January 2019

11 February 2019

Dear Kumi Naidoo,

Thank you for submitting your accountability report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to continuously strengthen accountability to communities, local partners, supporters, staff, donors, or other key constituencies. Our key focus is on accountability to those you serve. It is against this background that we critically discussed your report and came to the individual assessment below.

Amnesty International's eleventh report is thoughtful and demonstrates notable improvements from previous years, particularly regarding complaints mechanisms and its set up. The opening statement from new General Secretary Kumi Naidoo has a focus on listening to internal and external stakeholders and collaborating with other actors, and is open about the need to change ways of working, indicating an **institutional commitment** to dynamic accountability.

The Panel is pleased to see updates on the Global Transition Programme and how this has rooted Amnesty's work more deeply in local communities and realities. This has led to further strengths in the areas of stakeholder engagement. However, the Panel is concerned that the new arrangements have led to increased stress amongst staff, and would like to know what steps are being taken to ensure that work-related stress is being carefully monitored and addressed. The tragic suicide of Gaetan Mootoo has clearly been a wake-up call, and it was appropriate for AI to have instigated the independent review into it. The Panel would like to be kept informed of AI's actions responding to the recommendations made by that review.

The Panel appreciates Amnesty's efforts to better publicise its complaints and feedback mechanism, to improve data collection on this front, and to collaborate with other Accountable Now members to strengthen its approach. Efforts to improve diversity mainstreaming in Amnesty's work, particularly around youth and gender, are another good example of **improvement in this report**.

The report did not include as much evidence or examples as in previous reports, and the Panel would like to see more of this in future reports in order to illustrate how processes work in practice and demonstrate impact. Amnesty is also encouraged to publish more of its policies and processes online, such as its fundraising policy and new environmental policies.

While the Panel has not specifically flagged any key areas for improvement in this



report, given the current focus on internal changes to culture and ways of working, the Panel requests this be the **focus of Amnesty's next interim report**. We would like to hear more about progress on the safeguarding, dignity, and integrity model of working, outcomes of processes to better listen to internal and external stakeholders, and an update on the questions raised by the Panel under LA1.

Our intention is that this feedback letter, and any response you may wish to provide, is made publicly available on the Accountable Now website along with your report – as it is the case with all previously reviewed reports. 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 any comments or amendments by 11 March 2019. If you have any other feedback or comments on our work, please share them with us by sending them to the Accountable Now Secretariat.

Yours sincerely,

Accountable Now's Independent Review Panel





# Amnesty International's Accountability Report 2017

## Review Round January 2019

### PROFILE DISCLOSURES

#### I. Strategy and Analysis

1.1	<p><b>Statement from the most senior decision-maker</b></p> <p><i>Fully addressed</i></p> <p>The opening statement by Amnesty International's new Secretary General Kumi Naidoo demonstrates the importance of accountability for the organisation, with a focus on listening to internal and external stakeholders and collaborating with other actors. There is a recognition that internal ways of working will need to be adapted in order to build stronger partnerships, with more systematic sharing of knowledge and resources, and more effective mechanisms for people to provide feedback.</p> <p>The statement is open about the death of a staff member, Gaëtan Mootoo, and the introspection Amnesty is undergoing to re-evaluate its organisational culture and structure. Kumi Naidoo stresses that it will be crucial to rebuild trust both internally and externally, putting individual and collective wellbeing at the forefront of how Amnesty works. A first step in 2018 was work on a "safeguarding, dignity and integrity" model of working. The Panel looks forward to hearing about updates in future reports.</p> <p>Finally, the Panel notes positively that the accountability report is seen as a tool to foster dialogue about what Amnesty should be working on, how, and why.</p>
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#### II. Organisational Profile

2.1 – 2.7	<p><b>Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience</b></p> <p><i>Fully addressed</i></p>
2.8	<p><b>Scale of organisation</b></p> <p><i>Fully addressed</i></p> <p>In 2016-2017, Amnesty adopted new definitions of supporters and members, which are explained in the report. Activists and donors are now included within the supporters category. In 2017, Amnesty had</p>



	<p>almost 6.8 million supporters globally, with an increase of 1 million from the previous year. The report includes breakdowns of supporters by gender, location, and age.</p> <p>Information is also provided about research trips conducted and outputs (such as Urgent Actions, public statements and reports) produced. The regional focuses in 2017 were Asia, MENA, and America.</p> <p>The report points out that Amnesty is moving away from volume of outputs, to more agile and responsive responses to human rights abuses, and more creative and increasingly digital communication methods.</p> <p>Two examples are provided of how microtasking (assigning small tasks to many people in order to achieve a large job) has helped Amnesty research complex issues in hard to reach locations.</p>
2.9	<p><b>Significant changes</b></p> <p><i>Fully addressed</i></p> <p>Amnesty International concluded its Global Transition Programme in 2017, with a fully distributed structure of the International Secretariat in place, and increased alignment of priorities with local and regional contexts as well as global forces. The Panel would be interested in knowing to what extent staff were consulted on the Transition Programme, and with the relocation of functions, whether there are arrangements in place to assist those who are unable or do not wish to move.</p> <p>The next phase of the transition will be to Amnesty's culture as a global movement. Key focus areas until the end of 2019 are listed, and include strengthened impact and learning, further clarifying roles and responsibilities, and fostering a collaborative culture.</p> <p>In 2016 and 2017 a new national office was launched – Amnesty International Indonesia.</p>
2.10	<p><b>Awards received</b></p> <p><i>Fully addressed</i></p> <p>The Panel congratulates Amnesty on awards won for their project <a href="#">Refugee Nation</a>, and for being recognised as <a href="#">Finance Team of the Year</a> by the Third Sector Awards.</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>Amnesty's report is based on information collected from national entities, and covers the whole movement. In compiling the report, the Global Strategy and Impact programmes works with relevant International Secretariat staff, and Senior Management is involved at least twice a year to review results from internal reporting processes and to reflect on the Panel's feedback.</p> <p>The Panel notes positively that there have been improvements to Amnesty's data collection processes, including new materials to communicate about dynamic accountability. These are expected to feed into reporting under Accountable Now's new reporting framework.</p> <p>Amnesty is also working to create a streamlined performance monitoring framework for the whole organisation to improve transparency, accountability, learning, and impact. The Panel looks forward to updates on this in future reports.</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>Standard Action Reports (SARs) covering activities, impact, growth and accountability are submitted by national entities and continue to be one of the main sources for this report. Data from the SARs supports global planning and performance measurement. The current report is based on SARs from 67 entities in 2017 and 52 reports from 2016, accounting for over 94% of the movement's entities. The Panel commends Amnesty on this broad coverage.</p> <p>Financial data is generated from the quarterly financial updates submitted by Amnesty's national entities.</p> <p>Every two years, national entities are also required to carry out a self-assessment of their compliance with a set of Core Standards which aim to ensure quality governance. Results from these self-assessments were incorporated into a State of the Movement report in 2017, which is a further data source for this accountability report.</p>
3.10 – 3.12	<p><b>Changes in reporting parameters / Reference table</b></p> <p><i>Fully addressed</i></p>



IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	<p><b>Governance structure</b></p> <p><i>Fully addressed</i></p> <p>Amnesty International's new governance structure is explained, with an organigram to illustrate how the various bodies interact. The governance reform process which began in 2013 aimed to improve democratic decision making, increase quality participation of different parts of the movement, and enhance accountability. Under the new system, each national entity has one vote at the Global Assembly (the highest decision-making body, previously the International Council), as does a representative of the international members group. The report also outlines the functions and accountability of the four committees of the Global Assembly.</p> <p>Amnesty's International Board is elected by and accountable to the Global Assembly. The report also explains how the International Board and International Secretariat, as well as national entities, have assessed their performance against internal Core Standards in 2014 and 2016, with learnings feeding into action plans.</p>
4.2-4.3	<p><b>Division of power between the governance body and management / Independence of Board Directors</b></p> <p><i>Fully addressed</i></p> <p>The report explains the relationship between the Global Assembly, International Board, and International Secretariat. The Secretary General reports to the Board and is aided by the Senior Leadership Team. Board members as well as the Chair of the Global Assembly are non-executive.</p>
4.4	<p><b>Feedback from internal stakeholders</b></p> <p><i>Fully addressed</i></p> <p>The report outlines the channels through which Amnesty's members, national entities, and staff can contact the Board. The Panel would like to know more about how staff's concerns are listened and responded to under this section.</p> <p>The organisation's governance structure also provides formal procedures to raise issues before the Board and Global Assembly, and it is stated that members and staff are routinely consulted on key policies and strategies.</p>



4.5	<p><b>Compensation for members of highest governance body</b></p> <p><i>Fully addressed</i></p> <p>Members of the International Board are not remunerated, but expenses are reimbursed. A dedicated International Board Payments Committee approves requests for payments to cover Board members' loss of income incurred due to their Board-related duties. The Board also has a Remuneration Committee which oversees the compensation and reward frameworks for the Secretariat's Senior Leadership Team. Detailed information on <a href="#">salaries</a> and the <a href="#">gender pay gap</a> is published on Amnesty's website, which the Panel notes positively.</p>
4.6	<p><b>Conflicts of interest</b></p> <p><i>Fully addressed</i></p> <p>The conflict of interest and conflicts of duty policy applies to all decision-makers within Amnesty International, including the International Board. The Board has procedures in place to implement the policy, including conflict of interest declarations to be filled out upon appointment, and a standing item on each Board agenda. The policy has been in place since 2004 and is due to be reviewed and updated.</p>
4.10	<p><b>Process to support highest governance body's own performance</b></p> <p><i>Fully addressed</i></p> <p>The report explains how national entities appoint representatives to the Global Assembly, the highest decision-making body. It is stated that these representatives may be removed or replaced at any time – is there a term limit?</p> <p>A detailed explanation is provided of appointment, term limits, and accountability of the International Board. Noteworthy is the Competency Assessment Framework for the Board, which ensures a balance set of skills, experience, and backgrounds. Individual and collective performance of the Board (members) was conducted in 2016 and 2018, and in 2017 the Board identified key strategic priorities to focus on. Its performance against these priorities will be assessed, and monitoring the Board's performance is a compliance requirement for Amnesty's Core Standards. The Panel notes positively that Board members are supported in developing their skills through a Governance Programme at the International Secretariat.</p>
4.12	<p><b>Social charters, principles or other initiatives to which the organisation subscribes</b></p> <p><i>Not addressed</i></p>





	As in previous years, this point was not addressed in the report. This question is also included in the new reporting questions, and the Panel therefore (again) requests that Amnesty make a note for the preparation of the next full report to include this information.
4.14 – 4.15	<p><b>List of stakeholders / Basis for identification of stakeholders</b></p> <p><i>Fully addressed</i></p> <p>A detailed explanation is provided of how Amnesty identifies and prioritises key stakeholders, including rights holders and affected communities, government and decision-makers (with engagement of a broader/less conventional range of actors in this category recently), and global and intergovernmental organisations. Stakeholder identification is mostly conducted by relevant teams within Amnesty, and strategies are aligned with global and regional trends. The response highlights the challenge of balancing planned and project work with reactive and longer-term ongoing work; Amnesty is developing ways to better track and monitor this balance.</p>

## PERFORMANCE INDICATORS

### I. Programme Effectiveness

NGO1	<p><b>Involvement of affected stakeholder groups</b></p> <p><i>Fully addressed</i></p> <p>A commitment to active participation of stakeholders is reflected in Amnesty's global strategy, and the report states that there have been substantial improvements in this area, with innovative participatory approaches introduced in the past two years. These include supporting existing movements through protest monitoring and providing training on technology and security in partnership with human rights defenders.</p> <p>The quality of engagement with stakeholders is seen as particularly important, including developing a better understanding of the link between stakeholder engagement and impact. A positive trend towards a more participatory culture is reported, and some examples are provided of efforts in 2017. National entities are engaging rights holders at the planning stage of campaigns, and are incorporating gender and diversity considerations into their action plans.</p> <p>More detailed explanations and examples of stakeholder engagement in campaigns and activism, governance, and litigation and advocacy are provided. Some developments of note include the creation of an internal tool for planning and monitoring participation of different stakeholders at all stages of Amnesty's work, and workshops on strategic campaigning</p>
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	<p>planning and global participatory approaches with a focus on stakeholder participation. The Panel notes positively that good practices are shared within the movement.</p> <p>Two challenges identified are low levels of youth participation in most national entities' work, and a need to increase meaningful stakeholder participation in litigation efforts. While the report does not state how Amnesty intends to improve on the former, it does refer to actions to strengthen capacities on the latter point. The Panel looks forward to updates in the next full report.</p> <p>Finally, the Panel appreciates the graph depicting quality levels of youth participation in several aspects of national entities' work. Statistics on overall engagement of affected stakeholders is provided under NGO3 – the Panel notes that the figures are mostly consistent with those from 2015 (as reported in the last <a href="#">full report from 2016</a>) but the percentage of rights holders participating in the whole cycle seems to have decreased from 22% to 12%. The Panel would be interested in hearing about the reason for this.</p>
NGO2	<p><b><i>Mechanisms for feedback and complaints</i></b></p> <p><i>Addressed</i></p> <p>The Panel is pleased to see that Amnesty's updated <a href="#">feedback and complaints policy</a> (revised in 2017) is available online, and can be navigated to via the Contact Us page. The paragraph relating to the feedback mechanism is at the bottom of this page, and the Panel encourages Amnesty to make the mechanism even more visible, perhaps with a dedicated tab at the top of the website, or by including a link at the navigation pane at the bottom of each page. The Panel does however note positively that Amnesty is taking part in Accountable Now's peer advice group on complaints and feedback, with a commitment to further improve its mechanism in the first half of 2019. We look forward to reading about any updates in the next report.</p> <p>The response explains that Amnesty has introduced a clearer distinction between general feedback/comments and formal complaints. While general feedback is not recorded in detail, national entities do report on the general nature of the comments they tend to receive, whether they have social media moderation guidelines, and whether they need training or support in this area. It is noted that 50% of entities expressed interest in support in this area in 2017, and that Amnesty is working with entities to strengthen their capacities.</p> <p>The report provides an overview of the most common issues/topics about which general feedback and complaints were submitted in 2017, as well as</p>



	<p>figures on the number of complaints received and resolved at both international and national entity level. The Panel acknowledges that Amnesty is still working to improve consistency in reporting on complaints from national entities.</p> <p>Overall, the Panel appreciates the progress by Amnesty in this area, which had been flagged for improvement in recent years. In future, we look forward to more information about specific learnings or changes implemented in response to complaints received.</p>
NGO3	<p><b><i>Programme monitoring, evaluation and learning</i></b></p> <p><i>Fully addressed</i></p> <p>Amnesty's Impact and Learning system tracks impact at the project level and feeds into an analysis of Amnesty International's overall global impact and progress. This analysis is qualitative, as there are no measurable project related targets built into the global strategy. Is this something Amnesty is considering introducing in future?</p> <p>The Global Strategy and Impact Programme provides support on annual project reporting. Project data was received from 65 entities in 2017, representing 95% of all national entities. Overall, it appears that the International Secretariat perform better on narrow/specific outcomes whereas national entities are stronger on influencing broader change at national level.</p> <p>The One Amnesty project management method provides an integrated platform to report on and monitor project work across the movement – details are provided in the report.</p> <p>2017 data on stakeholder engagement shows that engagement has remained consistently high since 2011. 12% of national entities reported that stakeholders had participated in the entire project cycle, an increase from 10% in 2016. However, Amnesty's previous full <a href="#">report on 2015</a> indicated that 22% had participated in the whole cycle. What is the reason for this apparent decrease in engagement?</p> <p>There is also a detailed section in the report on strategic learning and adaptation, with a bespoke learning programme, SPARK! The programme aims to solve impact challenges which are jointly identified with key stakeholders, and updates are provided on how these have fed into specific strands of work in 2017.</p>



NGO4

**Gender and diversity**

*Addressed*

The report outlines how Amnesty has been working to address power imbalances, from the highest governance level to specific initiatives adopted by national entities. The Panel notes positively the increase in gender diversity amongst young supporters and members of Amnesty, as well as the 7% increase in projects which identify a gender or diversity outcome as of early 2018. However, the data presented from the entities' reporting through Standard Action Reports indicates that 10-20% of entities still do not provide responses on whether gender and diversity is appropriately considered in their work, with a third of entities not providing a response when it comes to the sub category of leadership and ownership. Is Amnesty able to encourage a higher response rate?

The report is open about the fact that more work needs to be done, with several reviews indicating that gender and diversity integration approaches are still weak. In 2017 the International Council approved a set of steps to guide gender and diversity strategy and planning until 2024, including the creation of a dedicated taskforce, a progress assessment framework, and global and national action plans. The Senior Leadership Team has instructed managers and staff to prioritise gender and diversity in their operational project planning, and guidance materials were developed to support staff in this – the Panel looks forward to an update on the outcomes and impact of this effort. As of 2018, all national entities are required to share information on their gender and diversity work, including any concerns about this in the entity's governance. A Gender Mainstreaming Advisor position has been created and the Panel eagerly looks forward to reading more about the achievements of this position.

The report provides details about Amnesty's [International Youth Strategy](#), which provides guidance on enabling active participation of young people, and sets the aim of ensuring young people comprise one third of Amnesty's supporter base by 2020. Some examples are provided of efforts to this end by national entities as well as in global governance. The International Secretariat's Dignity, Diversity and Inclusion strategy is also outlined, with examples of how the immediate priorities – behaviours, treating each other well, closing the gender pay gap, and feeling well at work – are being implemented.

Overall, it is apparent that Amnesty has made a real effort to improve diversity mainstreaming in its work, particularly around youth and gender. In future reports, the Panel would like to know whether Amnesty is focusing on



	any other diversity factors in a similar way to its focus on youth, with specific targets and action plans.
NGO5	<p><b>Advocacy positions and public awareness campaigns</b></p> <p><i>Fully addressed</i></p> <p>Amnesty's efforts in this area remain strong as in previous years. Amnesty has a rights holder centred approach to planning and implementing their work, involving them in the development of strategies, campaigns, and advocacy activities. Affected stakeholders are involved in project and campaign planning, monitoring, evaluation, and in developing exit strategies. Policies and advocacy positions are developed based on external research and consultation, and the broader membership is able to propose discussions on human rights policies.</p> <p>In 2017-2018 Amnesty updated its MEL framework for global campaigns in order to get a clearer overview of impact achieved globally. There are global indicators for each global campaign, and processes are being developed to enable internal and external stakeholders to better understand the impact Amnesty has at the national level. For each campaign, deep-dive areas are identified for in-depth impact and learning analysis. Amnesty also ensures that it consults key external stakeholders and rights holders when evaluating the success of its campaigns.</p>
NGO6	<p><b>Coordination with other actors</b></p> <p><i>Addressed</i></p> <p>The report explains Amnesty's approach to working in partnerships with local CSOs, and the added value provided by its member and supporter base. There is a focus on empowering local activists and amplifying the voices of rights holders in order to achieve systemic and long-term change. Examples of how Amnesty has worked in partnerships are provided from the <i>I Welcome</i> campaign around refugees, and work on women's rights and reproductive justice in Latin America. Amnesty's main role tends to be as convenor and facilitator of long-term partnerships, bringing different actors within civil society and local communities together.</p> <p>Amnesty carries out stakeholder analysis and power mapping to identify the actors it should work with. The Panel notes positively the increase in numbers of national entities that have processes in place to coordinate with other actors, and of entities that involve partners in all phases of their work.</p> <p>The Panel is also pleased to see that the Global Transition Programme, with Amnesty staff distributed amongst more regional offices, has led to an increase in partnerships and alliances, and more systematic work with</p>



	<p>individual rights holders, particularly in Africa and the Americas. Are there any similar results or examples from Asia?</p> <p>The report flags some areas for improvement, including the need for Amnesty to clarify its position within the regional civil society ecosystem, being more self-reflective of its impact on local and regional civil society, being more transparent transparency when exchanging views with peers in the regions, and providing more systematic feedback to partners after consultation. The Panel would like to see in future reports information about what Amnesty has done/is doing to address these issues.</p>
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## II. Financial Management

NGO7	<p><b>Resource allocation</b></p> <p><i>Fully addressed</i></p> <p>Amnesty's annual global financial report is available on their <a href="#">website</a>. The report briefly outlines the way entities allocate resources, the financial controls in place, and how resource allocation is monitored quarterly. The Panel would be interested in learning more about if/how resources can be re-allocated during the life-cycle of projects. For example, Sightsavers' <a href="#">2017 report</a> (pp. 26-27) explains how their Project Reporting and Oversight process allows for changes to project design and funding during the implementation/monitoring stages.</p>
NGO8	<p><b>Sources of Funding</b></p> <p><i>Fully addressed</i></p> <p>The majority of Amnesty's income comes from their members and individual donors, and a graph is provided to show income sources in 2017 and 2016. The report explains that funding is not sought from governments or political organisations in order to ensure independence, and that major donors make up a relatively small percentage of their total revenue. As a result, 96% of funding in 2017 was unrestricted. The top five donors in 2017 are listed, together with the amount of their contributions.</p>

## III. Environmental Management

EN16	<p><b>Greenhouse gas emissions of operations</b></p> <p><i>Fully addressed</i></p> <p>With the change in Amnesty's structure and the opening of regional offices, reliable emissions data was only able to be recorded for the London Secretariat in 2017. The Secretariat is working with regional offices to improve data collection on emissions, but it is expected that this will be difficult, as some offices do not have access to meters. The Secretariat's greenhouse emissions show an almost 50% increase from 2016 – the Panel</p>
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	would be interested in the reasons for this – while electricity usage has dropped by almost 30%.
EN18	<p><b><i>Initiatives to reduce emissions of operations</i></b></p> <p><i>Addressed</i></p> <p>It is stated that Amnesty has been developing new environmental policies and guidance relating to energy, water, waste and travel management, as well as staff engagement. These were to be launched in October 2018, so the Panel would have appreciated a link to the finalised policies in this report (submitted December 2018).</p> <p>Amnesty International's main environmental impacts are emissions from buildings and air travel. Systematic environmental assessments are not currently carried out ahead of programmatic work, which is linked to the fact that the organisation does not have concrete emission reduction targets. Amnesty is seeking advice from an environmental consultancy to help set targets. The Panel would be interested in an expected timeline for this and looks forward to an update in the next report.</p> <p>The report outlines initiatives to reduce greenhouse gas emissions in the London office (LED lights, air conditioning controls, and improvements to building management systems) and stated that in regional offices, the aim is to make environmental management part of the set up. Some staff groups have been set up in various office to improve staff engagement. It would be interesting to know how many offices have such groups as well as any other measures in place. Previous reports had referred to the number of entities that had environmental impact plans in place – are such plans still implemented, and if so, how many entities have them?</p>
EN26	<p><b><i>Initiatives to mitigate environmental impact of activities and services</i></b></p> <p><i>Addressed</i></p> <p>As stated in the response to the previous question, Amnesty does not currently carry out environmental assessments prior to carrying out activities, but is considering including this as a standard criteria in project planning.</p> <p>In general, the approach to minimising environmental impact of activities is by raising awareness and staff engagement internally. Amnesty is also developing a position an strategy on climate change and its impact on human rights.</p>
<b>IV. Human Resource Management</b>	
LA1	<p><b><i>Size and composition of workforce</i></b></p> <p><i>Fully addressed</i></p>



	<p>As in previous years, graphs are provided depicting the number of staff broken down by contract type and location. Noteworthy is a 25% decrease in the number of total staff since 2015 – can Amnesty explain the reason for this, given that AI's income has been rising steadily (by on average 6% p.a. since 2014) and expenditures appear not to have run ahead? A cut in staff of this magnitude is rare for a major ICSO, except in crisis situations. How does Amnesty ensure this decrease does not place an extra burden on remaining staff – has the overall work(load) undertaken by Amnesty decreased proportionally? Please explain which, if any, functions have been dropped or pared back.</p> <p>The Panel notes positively the steadily increasing percentage of staff based in the Global South in line with the Global Transition Programme – a 17% increase since 2011, with 29% of all staff based in the South in 2017. What provisions are made to help staff who need to relocate? For those that do not wish to relocate, are there any efforts to help them find an alternative position within Amnesty?</p>
EC7	<p><b>Procedure for local hiring</b></p> <p><i>Fully addressed</i></p> <p>Amnesty's efforts in this area remain strong, with local recruitment wherever possible, including for senior staff. 93% of directors are recruited locally – the Panel had previously asked whether this includes expats who have been locally recruited. Local salary benchmarking is conducted to ensure local NGOs are not undermined by Amnesty's hiring practices, and the effort to have all employees on the same salary/benefit scale, regardless of whether they are a local hire or not, continues. This positive initiative was mentioned in the 2015 report as well, and the Panel would be interested in hearing about specific progress, as well as any timelines that are in place.</p>
LA10	<p><b>Workforce training</b></p> <p><i>Fully addressed</i></p> <p>The report provides an overview of the average hours of training received per staff member in 2017, a comparison to previous years, and the amount/percentage of funds invested into training.</p> <p>Training at the Secretariat is offered around organisational, directorate-specific, and personal development themes. There is an increased focus on online training through Amnesty's e-learning platform, with some modules compulsory for all Secretariat staff. Personal development needs are identified through performance management processes. A new HR system introduced in 2018 is expected, over time, to support an improved talent</p>





	<p>management system, and provide greater insight into individual and global training needs.</p> <p>In future reports, is Amnesty able to provide evidence or examples of the effectiveness of staff development initiatives – has there been notable improvement in a certain area amongst staff? Have staff provided positive feedback about the training and development opportunities they receive?</p>
LA12	<p><b>Global talent management</b></p> <p><i>Addressed</i></p> <p>All staff are encouraged to complete annual performance reviews, and 69% of staff across national entities received performance reviews in 2017, an increase from previous years. The report states that the collection of statistics on this will improve as electronic performance reviews are introduced from the end of 2018.</p>
LA13	<p><b>Diversity of workforce and governance bodies</b></p> <p><i>Fully addressed</i></p> <p>As in previous years, information is provided on diversity in terms of gender and age amongst Amnesty's staff (though the figures in Table 11 on national entities do not add up to 100%). At the Secretariat, 66% of staff identify as female, and in the national entities 61% identify as female and 2% identify as neither female nor male. The Panel would also be interested in information on the demographics of staff in leadership positions (age, gender, local hire/expats). The Panel notes positively that Amnesty's next employee engagement survey will place greater emphasis on understanding experiences through different dimensions of identity.</p> <p>Information is also provided on the makeup of governance bodies – the Global Assembly, International Board, and broader information on national entities' boards. In general there appears to be a good balance in terms of gender and geography, but more needs to be done to increase youth involvement in governance. The report explains the measures Amnesty is taking in this regard.</p> <p>The Panel appreciates that Amnesty's understanding of diverse participation in governance goes beyond Boards and meetings, and includes equal opportunities for various groups and individuals more broadly. Diversity in the decision making process is monitored and reported to the Global Assembly. The Panel also notes positively the learnings Amnesty has extracted from its survey of Global Assembly Meeting participants, including the need for equal representation from different regions of the world, increasing accessibility for people with disabilities, and encouraging greater diversity in terms of socio-economic and educational</p>



	background. The Panel looks forward to updates in this regard in future reports.
NGO9	<p><b><i>Mechanisms to raise grievances</i></b></p> <p><i>Addressed</i></p> <p>It is stated that all Amnesty staff have access to formal and informal grievance policies, which are on the internal intranet, and that a whistleblowing policy and a new safeguarding policy linked to the grievance and discipline policies are also in place. The Panel encourages Amnesty to make these policies publicly available online.</p> <p>In addition to raising complaints or grievances directly with line managers or the HR department, staff can provide feedback through different types of meetings, or via Unite, the trade union. A peer to peer support network was introduced in 2017 to assist staff with grievances and support, and in 2018 there has been an increase in the number of formal and informal grievances raised.</p> <p>The report provides an overview of complaints received by the International Secretariat in 2017 – 9 in total, of which 4 were upheld – and the broad issues they related to. Can the Panel assume that the cases which were upheld were also resolved in line with Amnesty's policies and processes? Figures from national entities are not provided, and the response to NGO2 explains further how Amnesty is working to improve data collection from entities. The report does however refer to multiple channels through which staff of entities can raise grievances.</p> <p>In future reports, the Panel would be interested to know more about how Amnesty is promoting its grievance/complaints mechanisms internally, and how it is learning/taking broader action in response to the complaints it receives.</p>

## V. Responsible Management of Impacts on Society

SO1	<p><b><i>Managing your impact on local communities</i></b></p> <p><i>Fully addressed</i></p> <p>The report presents Amnesty's understanding of impact (intended and unintended, positive and negative) and explains how systems and processes to assess impact has been strengthened through the new Project Method (explained under NGO3). Amnesty undertakes rigorous risk and assumption mapping, engages with stakeholders throughout the project cycle, and monitors any potential adverse impacts of its work. Training materials have been developed to help teams understand this (as well as other aspects of) the project method.</p>
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	<p>Global risks are managed via risk registers, which are reviewed annually. The report lists the top five risks identified in 2017, though it does not specify what action is being taken to mitigate or respond to these risks.</p> <p>The Global Transition Process, which sees Amnesty rooted more in local communities, has led to more consultations with local communities and rights holders, which the Panel notes positively. Increased communication should hopefully lend itself to reducing any negative impacts on local communities.</p> <p>In future, Amnesty will work on improving the systematisation of how it learns from successes and failures.</p>
SO3	<p><b>Anti-corruption practices</b></p> <p><i>Addressed</i></p> <p>Amnesty reviews its policies and strategy relating to fraud, bribery and corruption on a regular basis. In 2016, the anti-bribery and corruption policy was updated to include anti-fraud, creating a single policy and approach. The policy was not linked and was not found on Amnesty's website either. In addition to the policy, a new training/education programme was created, including an e-learning module which is mandatory for all new staff and managers.</p>
SO4	<p><b>Actions taken in response of corruption incidents</b></p> <p><i>Fully addressed</i></p> <p>The report explains how Amnesty dealt with an internal fraud case perpetrated by a former staff member in the London Secretariat. The response included a full investigation by external experts, cooperation with UK authorities to prosecute the individual, and a review of Amnesty's financial controls and other systems to avoid another incident in the future. Specific actions taken include enhanced controls relating to the use of corporate credit cards and accounting, and strengthened background checks for new staff members. The incident also served as a case study during Amnesty's annual fraud awareness week in 2018. Overall, Amnesty's approach seems strong.</p>
<p><b>VI. Ethical Fundraising</b></p>	
PR6	<p><b>Ethical fundraising and marketing communications</b></p> <p><i>Addressed</i></p> <p>Amnesty is committed to bring transparent, ethical and open when fundraising, and efforts are governed by a Global Fundraising Policy – the Panel repeats its request for a link to this document. The response explains how Amnesty ensures fundraising is in line with national laws and regulations,</p>



and that funding is not accepted from sources linked to the violation of human rights.

The report explains Amnesty's approach to receiving and resolving complaints relating to fundraising, and provides an overview of complaints received in 2017. Only 40% of complaints were resolved – are the others still under investigation, were they established to be unfounded, or what is the status of the unresolved complaints?