Restless Development
Independent Review Panel Feedback
Accountability Report 2016
Review Round December 2017
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Feedback from the Independent Review Panel
Review Round December 2017

22 December 2017

Dear Nik Hartley,

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.

Restless Development’s first accountability report is impressive, and indicates a strong institutional commitment to dynamic accountability underpinning the organisation and its work. CEO Nik Hartley’s opening statement reflects Restless’ commitment to increasing impact and involving its stakeholders - this is shown throughout the report to stretch from strategy and policy development, to the creation and implementation of programmes.

The report is detailed, includes links to relevant policies in most places, and in the instances that direct links are not provided, these can easily be found on Restless’ website. The Panel views this commitment to transparency and information sharing as a good practice. Other good practices include the reporting process (3.5) which is used to inform targets and activities in the coming year and includes planned improvements for the next reporting period, the Global Salary Sale (4.5), and the involvement of stakeholders in the design and implementation of programmes (NGO1).

Whilst some evidence in the form of case studies is provided in the report, the Panel would encourage more examples of how policies and processes work in practice – and notes that this has been identified by Restless as a goal for the next reporting period.

Weakness areas include feedback from internal stakeholders (4.4), the process to support the governance body’s performance (4.10) and reference to other social charters of which Restless Development is a signatory (4.12).

Finally, the Panel commends Restless Development’s strong promotion of dynamic accountability - through a dedicated page on the website as well as a section on transparency. Accountable Now membership is highlighted on both pages.

Overall, the Panel approves of Restless Development's first accountability report to Accountable Now, and the organisation is moved from Affiliate to Full Membership with immediate effect.

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 16 January 2018.

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,

Mihir Bhatt  Rhonda Chapman  John Clark  Louise James

Jane Kiragu  Nora Lester Murad  Saroeun Soeung
Restless Development’s Accountability Report 2016
Review Round December 2017

PROFILE DISCLOSURES

I. Strategy and Analysis

1.1 Statement from the most senior decision-maker

Fully addressed

The opening statement from CEO Nik Hartley highlights the importance of accountability to Restless Development; particularly listening to feedback from stakeholders in order to improve impact and increase trust.

Restless’s dynamic approach to accountability, laid out in the following pages of the report, includes some commendable commitments to transparency. By opening and publishing internal processes (such as live streaming the Directors’ Conference) rather than just results, Restless demonstrates a commitment to transparency beyond just compliance. The Panel also commends efforts to actively listen to and include stakeholders in decision making – for example in shaping the new global strategy.

II. Organisational Profile

2.1 – 2.7 Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience

Addressed

How do primary activities support the attainment of Restless’ mission and strategic goals? Information about the location of headquarters and nature of ownership can be found in the Financial Report – but references to specific pages/paragraphs would be helpful.

2.8 Scale of organisation

Partially addressed

The Financial Report includes information on some parts of this question. More information is requested on the breakdown of employees, supporters and members, in addition to the number of volunteers which is provided. A comparison over the past few years is
suggested in subsequent reports. The scope and scale of activities is mentioned in the Financial Report, but not exhaustively – more information can be found in the Annual Report.

| 2.9 – 2.10 | Significant changes to previous reporting / Awards received |
|            | Not applicable |

### III. Report Parameters

| 3.1 – 3.4 | Reporting period / Date of most recent report / Reporting cycle / Contact person |
|           | Fully addressed |

| 3.5       | Reporting process |
|           | Fully addressed |

Restless Development has a participatory and inclusive reporting process, with input received from across the agency, and opportunity for contributors to review the first draft and provide further input.

The Panel is pleased to note that the report will be used to set targets and activities for the coming year, and will be shared across the agency – this demonstrates that the process is more than a compliance exercise.

The Panel commends the inclusion of points on how the reporting process will be improved in the next years: by involving more stakeholders, including case studies, improving timeliness, and further using the report to guide Restless’ work.

This forward thinking approach, which is also reflected throughout the following sections of the report, is identified as a good practice.

| 3.6 – 3.8 | Report boundary / Specific limitations / Basis for reporting |
|           | Fully addressed |

| 3.10 – 3.11 | Significant changes in reporting parameters |
|             | Not applicable, as this is the first report |

| 3.12       | Reference Table |
|           | Addressed |

A reference table was provided, with relevant page numbers within the report for each indicator – highlighting the specific paragraphs would have been even more helpful. Where certain information did not naturally fit into the report, due to its purpose as a broadly accessible agency accountability report, it was provided in the reference table. However, where references to other organisational reports were made (e.g. the financial report), page numbers are also requested.
## IV. Mission, Values, Governance, and Stakeholder Engagement

| 4.1 | **Governance structure** | Fully addressed  
A clear overview of the governance structure, levels of authority, and risk management/compliance is provided. It is noted that a diverse Board is pursued, with stakeholders (young people) represented. |
| 4.2 | **Division of power between the governance body and management** | Addressed  
The Panel requests some further information on supervision and evaluation of the chief executive and details of how trustees and management work together (e.g. types and frequency of communication) in the next report. |
| 4.3 | **Independence of Board Directors** | Addressed  
A list of Trustees is available in the [Annual Report](#). How many of these (if any) are independent? |
| 4.4 | **Feedback from internal stakeholders** | Not addressed  
Beyond working closely with senior management to help achieve Restless Development’s goals, do Trustees engage with other staff and/or country offices? Are internal stakeholders able to provide recommendations and feedback to the Board? |
| 4.5 | **Compensation for members of highest governance body** | Fully addressed  
Trustees serve on a voluntary basis. The salaries of management and executives (and in fact all staff) are determined in line with a [Global Salary Scale](#) which is published on Restless’ [website](#). Is the salary scale a guideline, or a minimum/maximum amount for the position? Or do all staff receive the exact amount corresponding to their position?  
The scale is calculated to ensure staff in comparable positions receive wages (and hold job titles) consistent with peers in other offices around the world, which the Panel commends as a [good practice](#). |
4.6  Managing conflicts of interest  
*Fully addressed*

Trustees and senior management complete an annual declaration of interests, which is also published online.

4.10  Process to support highest governance body’s own performance  
*Not addressed*

Information on appointment of Trustees, term limits, and evaluation of the Board of Trustees’ performance were not provided.

4.12  Social charters, principles or other initiatives to which the organisation subscribes  
*Not addressed*

Whilst it was stated that this was not applicable to Restless Development in the reporting reference table, membership of organisations such as International Aid Transparency Initiative should be mentioned here.

4.14-15  List of stakeholders / Basis for identification of stakeholders  
*Partially addressed*

It is clear throughout the report that young people are the main stakeholder group, though the Panel notes positively that Restless Development sees them as changemakers rather than “affected stakeholders”.

More information on how the stakeholder group is defined (e.g. age, geographical location, particular skills/motivation such as young leaders), identified and prioritised is requested for the next report.

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**PERFORMANCE INDICATORS**

**I. Programme Effectiveness**

<table>
<thead>
<tr>
<th>NGO1</th>
<th>Involvement of affected stakeholder groups</th>
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<tbody>
<tr>
<td><strong>Fully Addressed</strong></td>
<td><em>The Panel commends Restless Development’s involvement of young people in creating their new global strategy. A youth-led process of consultations in 64 countries fed into the strategy, with consultation findings published online. Restless’ commitment to using the learnings to improve internal processes is also noted positively.</em></td>
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</tbody>
</table>
A detailed youth leadership model outlines the ways in which youth are engaged and actively encouraged to lead Restless’ work – from projects on the ground to representation on the Board of Trustees.

Some case examples are provided, and it would be interesting to follow whether the ideas and recommendations presented (in the examples of the British Government’s development priorities and debating the SDGs) are actually implemented.

| NGO2 | **Mechanisms for feedback and complaints**  
**Addressed**  
 Several formal and informal mechanisms for stakeholders to provide feedback are listed, and regular support and review meetings are implemented in programmes. External stakeholders can submit complaints to Restless Development staff or young leaders, and these can also be passed on by staff through the internal whistleblowing process.  
 An example of how a complaint has resulted in a report and action plan to improve the International Citizen Service programme is provided. Information on the overall number of complaints and the percentage of these which have been resolved is requested in the next report.  
 While a link was not provided to the complaints policy, it can be found on Restless’ [website](#). It appears as though complaints can be submitted to Restless’ info email address, but this was not entirely clear as the address was provided with specific reference to reviews of requests for information. |
| NGO3 | **Programme monitoring, evaluation and learning**  
**Addressed**  
 The Panel commends Restless Development’s stakeholder-oriented monitoring, evaluation and learning (MEL) systems, such as the use of apps and youth and gender sensitive tools. A programme in Nepal which was pre-tested and adjusted before being rolled out nationally is an example of MEL efforts shaping programmes.  
 Results of Restless’ evaluations of programmes are available on their [website](#).  
 More information about how management responses are shaped by MEL is requested in the next report. |
| NGO4 | **Gender and diversity**  
**Fully addressed**  
 Restless Development’s approach to reach and involve a diverse range of stakeholders is outlined, including reaching out to those outside of formal education and who may be illiterate (in addition to the aim to engage
young people regardless of age, sexuality, gender, ethnicity and background). It is stated that “reasonable adjustments” are made to ensure a diverse range of stakeholders inform and lead programmes – some examples would provide a better idea of what this entails in practice. Are there any targets Restless is working towards in this area?

| NGO5 | Advocacy positions and public awareness campaigns  
Addressed  
Restless has developed its advocacy focus areas and policy positions in line with its four goal areas, which were created consultatively with a large number of stakeholders. Are there measures in place to ensure that policy positions are evidence based, effective, and respectful of people’s dignity?  
It is evident through the examples provided that Restless is committed to involving its stakeholders in both the design and implementation of its advocacy campaigns, and helps them build the capacities and skills necessary to do so.  
Are there examples of how corrective action is taken in campaigns, when needed? It was stated in one example that there was no formal exit strategy – is this always the case? |

| NGO6 | Coordination with other actors  
Addressed  
A commitment to capacity building and coordinating with other actors, particularly promoting the involvement of CSOs from the Global South, is evident. Restless appears to facilitate inclusive and meaningful partnerships, and provide resources to partners seeking expertise, at local, national, and global levels.  
The delivery of programmes through existing structures to create sustainable impact beyond the term of the programme, is a positive example of local capacity building.  
How does Restless ensure that its partners also meet high standards of accountability? |

| II. Financial Management  
NGO7 | Resource allocation  
Fully Addressed  
Restless publishes its audited financial accounts on their website as well as that of the UK Charity Commission. A number of measures are in place to ensure effectiveness of resource allocation, from engagement and effectiveness evaluation tools, to internal and external audits. These audits, |
as well as other policies and procedures outlined in the report, also minimise the risk of funds being misused.

<table>
<thead>
<tr>
<th>NGO8</th>
<th>Sources of Funding</th>
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<tr>
<td></td>
<td>Fully addressed</td>
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### III. Environmental Management

<table>
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<tr>
<th>EN16, EN18</th>
<th>Greenhouse gas emissions of operations / Initiatives to reduce emissions of operations</th>
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<tbody>
<tr>
<td></td>
<td>Addressed</td>
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<td></td>
<td>In the reporting period, the total carbon emission was 1,515,752 kg – 88.4% of which was made up of flights. What was the remainder due to?</td>
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<td>It is explained that the flights are a key part of Restless’ International Citizen Service programme and cannot be reduced. However, Restless is looking into options to reduce other flights, and greener programming to reduce its carbon footprint.</td>
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<td>Analysis of the London office’s carbon footprint will begin a process of measuring the whole organisation’s footprints, and developing plans to reduce emissions. Restless is considering publishing its carbon footprint figures online, together with their commitments to reducing these, which the Panel notes positively and looks forward to seeing.</td>
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<td>As Restless progresses in this area, the Panel looks forward to more information on how emissions data is obtained, against which standards they are measured, and concrete targets for reduction in the next report.</td>
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<table>
<thead>
<tr>
<th>EN26</th>
<th>Initiatives to mitigate environmental impact of activities and services</th>
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<td>Addressed</td>
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<td></td>
<td>All of Restless Development’s programmes are required to align with their Environmental Principles and are planned to reduce negative environmental impacts. There are environmental impact assessments in the planning and design stages of all programmes, and adjustments are made as needed to improve.</td>
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<td>The Panel also commends the inclusion of sustainability and environmental protection into its financing policies and decisions, including procurement, fundraising and banking.</td>
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<td>The Panel looks forward to reading more in the next report about which are the main environmental impacts of Restless’ activities, as well as progress on the tools, processes and frameworks Restless intends to develop to ensure their environmental programme principles are implemented effectively.</td>
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IV. Human Resource Management

<table>
<thead>
<tr>
<th>LA1</th>
<th>Size and composition of workforce</th>
<th>Addressed</th>
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<tbody>
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<td></td>
<td>The Panel recommends that Restless Development include these figures in a table if possible, with a breakdown by responsibility levels and gender as well as geographical region. Educo (pg. 35-46) and World Vision (pg. 27-28) are examples of how this information can be visualised to give a better overview of workforce composition. Data compared over multiple years can provide an insight into changes over time.</td>
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<th>EC7</th>
<th>Procedure for local hiring</th>
<th>Addressed</th>
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<td></td>
<td>A <a href="#">global recruitment and induction policy</a> guides recruitment in all Restless Development Hubs and offices. Whilst there is no specific local hiring policy, Restless states that they aim to have a majority of staff native to where particular operations are based. How is this aim pursued?</td>
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<td>In the reporting period 92% of staff were native to the country they were working in - it would also be interesting to know the percentage at senior management level.</td>
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<td></td>
<td>The Global Salary Scale ensures that take-home pay is comparable across Restless’ country hubs. Are there also checks in place to ensure salaries and hiring practices in general build local capacity and do not undermine local CSOs?</td>
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<tr>
<th>LA10, LA12</th>
<th>Workforce training / Global talent management</th>
<th>Addressed</th>
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<tr>
<td></td>
<td>Restless Development’s <a href="#">global performance and development guidelines</a> guide workforce training, which includes internal as well as external training, self-study, staff exchanges, assistance in career planning, mentoring, and provision of challenging roles. Training and development opportunities are led by staff, and supported by Restless – does this mean that this might be neglected if not proactively pursued by staff members?</td>
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<td>Restless’ staff satisfaction survey reveals above average results in all areas, compared to other comparable charities. Have there been specific questions about training and personal development opportunities to obtain staff feedback? What evidence is there that training and staff development mechanisms work well in practice?</td>
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</table>
### Diversity of workforce and governance bodies

**Addressed**

Restless’ recruitment and equal opportunities policies mention an impressively comprehensive range of factors which should not affect treatment of staff.

Restless aims to have a 50-50 balance between male and female staff, a majority of staff being local to the country, and 51% of staff being under 28 years of age. The gender and age targets have not yet been achieved, and the Panel looks forward to seeing the policies and practices Restless planned to introduce in 2016/17 to improve in this regard. The Panel would also like to see a breakdown of these figures at the senior management level.

### Mechanisms to raise grievances

**Fully addressed**

Whilst not mentioned in the report, Restless Development’s *Employee Handbook* includes a section on dignity at work (pg. 27-28) which covers relationships, sexual and other forms of harassment, bullying and victimisation. There are also sections on working hours and leave (pg. 37), HIV and AIDS (pg. 62), and a detailed grievance procedure which allows for complaints to be escalated as appropriate (pg. 54). There is also a separate *whistleblowing policy*.

In the next report, the Panel requests information about how many grievances have been brought up, and how these have been addressed and/or resolved (or are being resolved) satisfactorily - to both parties.

### Managing your impact on local communities

**Addressed**

A set of Impact Principles guide how Restless ensures impact in its programming – including clear and measurable change objectives and the sharing of learnings on what works amongst the different programmes. Sustainability is also covered in Restless’ Programme Principles, and all programmes have implementation plans and exit strategies. A global Safeguarding Policy guides child protection.

The Panel would like to know more about the feedback that has been received from communities in which programmes are running, and how it has been responded to.
| SO3 | **Anti-corruption practices**  
Fully addressed  
Restless Development has a comprehensive risk management system, which begins with a robust recruitment process and continued with a zero-tolerance approach to fraud and bribery, laid out in staff policies. Staff participate in annual trainings on these issues, national Hubs undergo regular and multi-tiered risk assessment, there are policies to prevent and report fraud, and internal audits ensure policies and processes are in place and in use. Is there evidence that these systems work well in practice? |
| SO4 | **Actions taken in response to corruption incidents**  
Partially addressed  
No incidences of corruption were detected in the reporting period. Whilst the report did not point to how Restless would record or publish any incidents if they were to happen, this information can be found in the Employee Handbook (pg. 73-74): “the International Finance Director will maintain a record of all incidents across the organisation. A report will be shared quarterly with the F&A Committee. Material incidents will be shared with the wider Board... Any confirmed instances of fraud should be reported to the relevant donor... In some instances there may be a requirement to report the incident to regulatory bodies” |
| VI. Ethical Fundraising |  
**Ethical fundraising and marketing communications**  
Fully addressed  
A number of guidelines and policies guide fundraising and communications activities. The Panel notes positively the approach to consent forms – rather than just obtaining a signature, the aim is to explain the purpose of collecting the participant’s story and how it may be used. Staff and volunteers are trained on how to capture and share stories sensitively.  

An Ethical Funding Policy guides the acceptance or refusal of funding from private sector organisations, and all major and institutional donors are published, as are corporate partners.  
No fundraising related complaints were received in the reporting period. It is stated that Restless is developing a more comprehensive complaints procedure which meets The Fundraising Regulator’s standards – the Panel looks forward to more information on this in the next report. |