



Accountable Now Annual Report

January to December 2018

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Acronyms

ACHPR	African Commission on Human and People's Rights
ARP	Annual Reflection Process
CSO	Civil Society Organisations
ECOWAS	Economic Community of West African States
FAA	Freedom of Access Act
FoE	Freedom of Expression
FoI	Freedom of Information
HRD	Human Right Defenders
IACtHR	Inter-American Commission on Human Rights
ICANN	International Corporation for Assigned Names and Numbers
IEEE	Institute of Electrical and Electronics Engineers
IET	Internet Engineering Taskforce
IRTF	Internet Research Taskforce
ISP	Internet Service Provider
ITU	Internet Telecommunication Union
IXP	Internet Exchange Point
LGBTI	Lesbian, Gay and Bisexual, Transgender and Intersex
RTI	Right to Information
UN	United Nations
XPA	Expression Agenda (ARTICLE 19 Strategy 2015-2020)

Introduction

Opening Statement

ARTICLE 19 has a strategic approach to accountability. We use the right to access information to hold decision-makers to account for their actions. In the same way, we hold ourselves accountable to our all our stakeholders across the globe.

More than ever, we need informed citizens, strong institutions, and the rule of law: expression and information are the keys to this.

Content moderation on social media must protect freedom of expression while preventing serious abuses, such as hate speech, violence against women and radicalisation. Inclusion is both the prevention and cure to those problems: more speech is needed to tackle hate. ARTICLE 19's work is making this understood at a multitude of levels, from UN advocacy work to our on-the ground trainings delivered to students, journalists, law professionals and faith leaders among other. Hope lies in voices being raised and in demands being made for human rights, for fair laws, for strong institutions, and for public information. Accountability is one of ARTICLE 19's global outcomes. We aim to influence and promote progressive transparency and accountability frameworks (and related standards on privacy), to enable people to hold their governments to account.

We believe in accountability to our all our stakeholders. In particular, we are accountable to the peoples whose rights we seek to protect and advance. We are further accountable to our supporters, staff and volunteers, donors, partners, regulatory bodies, the general public and organisations or people whose policies, programmes or behaviour we wish to influence.

We demonstrate our commitment through our participation in accountability and transparency initiatives and internally and through a number of actions, including strong policies, systems and processes. These include ensuring accountability via the whistleblowing policy, and policies on issues of sexual harassment and safeguarding.

As the NGO community continues to face the challenge of meaningful safeguarding and ethical standards in the delivery of their work, ARTICLE 19 has faced challenges resulting from our considerable growth, and the change processes we have implemented to support that growth. We have approached these challenges openly and honestly with our donors and staff.

ARTICLE 19's two accountability priorities for 2019 are: to develop our ethical fundraising policy and to become more consistent in gathering and analyzing beneficiaries' feedback across the organization. We count on Accountable Now to support us in our ongoing commitment to further progress accountability.

Tom Hughes, Executive Director
ARTICLE 19

Cluster A: What we have achieved

A. What we have achieved

1. What are your mission statement and your theory of change? Please provide a brief overview.

ARTICLE 19 mission is to promote and defend freedom of expression and information as essential human rights, so that people everywhere can express themselves freely, access information and enjoy freedom of the media both online and offline.

We envision a world where all people can speak freely, actively participate in public life and enjoy media freedom without fear, censorship or persecution. We look at the fundamental underlying issues and at the different patterns of exclusion, ethnicity, age, education, sex and gender that affect freedom of expression.

To address the complexity of those underlying issues ARTICLE 19's Theory of Change is based on three interlinked pillars which aim to balance the unequal power dynamics. These are created by the rise of authoritarian social models and political ideas that restrict people's rights and freedoms.

- a) Strong laws and policies are the foundation for realising the rights of all to express themselves freely, and to seek, receive and impart information.
- b) Accountability and transparency of power-holders is key for the realisation of human rights and sustainable development;
- c) Active and empowered civil society is essential for using expression and information rights to pursue dignity, equality, good governance and sustainable development.

Self-assessment score: 4

2. What are your key strategic indicators for success and how do you involve your stakeholders in developing them?

ARTICLE 19 has a complex, multi-faceted strategy (The Expression Agenda, XpA 2016-2022). The XpA has five overarching themes: Civic Space, Digital, Media, Protection and Transparency. The strategy includes global and regional outcomes, setting out broad objectives at the relevant levels related to these overarching themes. Outcomes are then broken down into targets – more specific deliverables reviewed every two years. In total, there are 16 global and 206 regional outcomes and over 200 targets. Each outcome has at least one indicator to help teams measure their success.

At the launch of our strategy in 2015, we engaged our donors and partners in the development of these outcomes. They were able to participate and contribute through a 'wiki' based strategy, face to face meetings and interviews. In 2017, a review took place. Again, a wide range of stakeholders at regional level were able to critically evaluate its progress and propose updates and changes through structured in depth interviews. The review included case studies and in one of our regions, South America, end beneficiaries were involved in the review.

Overall, there are two processes through which the targets, and to an extent, outcomes, are being planned and reviewed. The planning process for XpA strategy occurs every two years. This process is an opportunity for teams to consider what they have achieved, as well as to discuss what is achievable in the next two years. As a part of this process ARTICLE 19 teams form what we call Target Operational Plans (TOPS). These plans contain the level of detail and clarity needed for various purposes including detailed planning, proposal development, tracking and reporting.

The progress against the strategy is also regularly monitored through the Annual Review Process, an exercise in which the delivery of the outcomes at all levels is assessed. It's a participatory process including internal peer review. In addition, quarterly monitoring of outcomes and targets is carried out.

Please see in Annex 2, ARTICLE's 19's Goals, Outcomes and Activities for each of the strategic themes.

Self-assessment score: 3

3. What progress has been achieved and what difficulties have been encountered against these indicators over the reporting period?

As a part of the Annual Review Process 2018, teams were asked to assess the overall progress towards outcomes and targets, using a progressive rating scale from 'inactive' or 'cancelled' to 'excellent progress'.

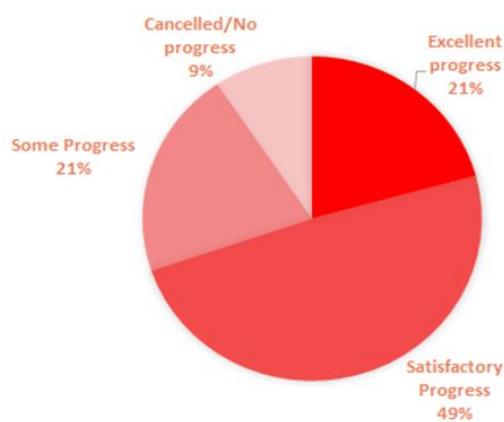
At the international level, of our 16 global outcomes, 70% were deemed to have made 'satisfactory' progress or better mid-way through our second two-year strategy cycle. Five global outcomes have been marked as making 'some' progress.

During 2018, we have also delivered on 54 international targets, which drove the work at international fora and regional mechanisms, interlinking those with national work, as our global Expression Agenda strategy is committed to delivering change at the local level. As an example, our Hate Speech toolkit contextualised international standards on hate speech and religious intolerance in three countries where we work. Of the international targets, 70% of were judged to have made either satisfactory or excellent progress by December 2018. A further 9% were classified as having no progress or cancelled (see fig. 1).

The regional teams delivered almost 200 regional outcomes.

Excellent progress was reported in 21% of cases, satisfactory in 49%. 21% rated "some progress" and 9% assign "no progress or cancellation of outcome".

Figure 1: Progress on international targets in 2018.



Some of ARTICLE 19's top achievements in the reporting period include:

- Increased use of our in house-developed "Hate Speech Toolkit". This has helped us to constructively engage with a broader range of stakeholders in the civil space arena.

- Increased support received from key stakeholders in targeted governance bodies for projects in the Digital and Protection area.
- Positive, demonstrable changes in media/ social media regulation across most of regions we work in.

The main difficulties related to lack of progress in our outcomes are due to funding gaps. At least 11 regional outcomes/international targets have not progressed because of lack of funds. A recurrent challenge during 2018 was ARTICLE 19's lack of in-depth knowledge of local partners' capacities and its organisational development prior to partnering with them. (Due diligence for implementing partners usually takes place when ARTICLE 19 receives the grant and by then the partnerships is normally established). There are other internal issues affecting the delivery of our outcomes, such as shortage of experts in local offices to deliver digital projects. We are working to find appropriate solutions to these issues.

Self-assessment score: 3

4. Have there been significant events or changes in your organisation or your sector over the reporting period of relevance to governance and accountability?

The human rights sector is facing ongoing challenges related to shrinking civic space and rise of dangerous narratives, putting human rights framework and its implementation at risk. In the UK, the organization has been preparing itself for the outcomes of Brexit, which will have significant effect on its operation, including funding received from the European Union. Risks around this issue are currently being mitigated through concrete actions commissioned by the senior leadership.

During the reporting period, ARTICLE 19 set up the MENA Regional Board and the first two meetings of this Board took place in July and December 2018.

During 2018 there were also changes in the International Board Members. Evan Harris and Kamal Labidi resigned from ARTICLE 19's Board of Trustees and 3 new trustees were appointed: Mark Salway, Bob Latham and Catalina Botero.

Self-assessment score: 3

B. Positive results are sustained

1. What have you done to ensure sustainability of your work beyond the project cycle, as per commitment 4? Is there evidence of success?

Key strategies used to improve sustainability of our work in 2018 were focused around i) improving our learning and evaluation practices, and ii) equipping partners and human rights defenders with information, resources and capacity to actively drive the changes we want to see collectively.

We have begun to invest much more in formative evaluation work engaging a range of partners and other stakeholders at ARTICLE 19. This includes core grants, such as the one from SIDA (evaluated in 2017), with next core grant evaluation due for mid-2020. This initiative was suggested by ARTICLE 19, showing commitment to driving improvement in this area. We have also seen several teams routinely evaluating work post project and emphasizing the need for projects to follow up with beneficiaries once they have engaged with us on capacity building initiatives.

ARTICLE 19 works closely with local partners who in many cases are the main implementing partners. Through ARTICLE 19 partnerships, local partners can gain access to resources, capacity and international representation. This contributes to ensuring sustainability of the work towards Freedom of Expression and Right to Information when a specific project finishes.

ARTICLE 19 believes that equipping civil society with tools and knowledge leads to increased demand on government and powerholders to recognise and protect human rights, and that building partnerships and working in coalitions makes advocacy more effective. We engage in this strand directly through producing materials and tools to support civil society actors. ARTICLE 19 indirectly engages with awareness-raising, advocacy and capacity development of civil society and the media, as well as strengthening networks and coalitions.

In 2018, we trained over 2,600 people in a range of topics geared to support them defend Freedom of Expression and Right to Information in their countries and regions. In 2018 a total of 1,678 journalists and HR activists (57% men, 43% women) from the Iranian diaspora, Mexico, Bangladesh, Brazil, Kazakhstan, Kyrgyzstan, Tajikistan, Kenya, Uganda, Tanzania and Cambodia, participated in our holistic protection programme.

However, ARTICLE 19 recognises the need to push for more routine and effective feedback on changes in behaviour and practice following engagement with our training programme and elsewhere. Whilst we are able to track numbers, and gender disaggregations, there is still work to be done to realise as an organisation awareness of wider impacts.

Self-assessment score: 3

2. What lessons have been learned in this period? How have the lessons been transparently shared among internal and external stakeholders? How do you plan to use these lessons to improve your work in the future?

Looking at the big picture, we learned that we need to develop better arguments to defend freedom of expression as a necessary and fundamental human rights from attacks from both “liberal” and “regressive” communities. The rise of problematic speech online, and the impacts of that at a societal level, have pushed even liberal democracies to adopt measures that explicitly shrink the space for expression and information online. We must have a more robust response, more deeply argued and emotionally resonant than “the antidote to bad speech is more speech.”

During the reporting period, ARTICLE 19 has trialed some new approaches and ways of working. In 2018, we ran a pilot project on using market research data to develop campaigns designed to move public opinion on protest, which has helped us to change the way we think about campaign design. Interesting learning on increasing active participation and moving the needle on public opinion has been gained through this market research. In Brazil, feedback received from the research and focus groups formed a rich contribution to the existing research and campaigning work. The need to consider diversity and inclusion in human rights research from its inception was highlighted as well as finding more innovative ways to communicate our work.

There have also been lessons learned on partnerships and contractual compliance. Some of our partners struggled to keep up with the administrative requirements from our donors, and we found ourselves having to build capacity of our partners in a number of instances, impacting our resources. We have

been managing this through promoting appropriate due diligence practices and encouraging Project Managers to carry out timely due diligence with their partners.

We have also learned that the implementation of our gender strategy ("MX Method") into projects remains uneven. With the MX Method strategy, a project dedicated to violence against women and more work focusing on participation and inclusion of more vulnerable groups, the organization has made a big step forward in this area. However, we still need to develop more specific and culturally appropriate entry points to systematically mainstream gender and ensure diversity and inclusion across all our work.

We have also learned that as our organization grows, we need to get better at communication, coordination and collaboration. This relates to ways of working, but also our processes and systems (including IT systems and capacity). Therefore, during ARTICLE19 is developing some concrete initiatives such as a Cultural Review across our offices to ensure our practices are aligning with our values.

ARTICLE 19 captures learning in following ways:

- 1) At an organizational level, through the Annual Review Process (ARP), teams are asked about the challenges they face working in ARTICLE 19 and the lessons learned. This is a well-established process within the organization. Responses are structured around the following questions:
 - In what ways are we working together effectively
 - What is challenging, and
 - What changes should we consider?

Through the ARP of the reporting year, we learned that there is the need to improve our partner and stakeholder analysis so we can identify and reach supporters beyond the usual natural partners in our projects. For example, we normally work with established CSOs, local NGOs, academia and whenever possible government agencies. We need to systematically identify and reach out to more untraditional potential partners and supporters such as "techie groups", university students associations and other groups we generally do not engage with, to the same extent.

We have also learned through the ARP that the implementation of our gender strategy into projects remains uneven. Some projects show excellent examples of gender inclusiveness while others are "gender blind." ARTICLE 19 is working to develop specific strategies to better mainstream gender in projects.

- 2) At the project level, we aim to gather lessons from projects every quarter, at mid-term and final evaluation and during sessions with stakeholders at project closure. Even though much progress has been made, there is room to improve this learning practice and make it more consistent throughout the organization. The lessons gathered during the implementation of projects, are discussed with the stakeholders, through the regular meetings.
- 3) Internally, through learning initiatives such as Cross Organisational Groups (COGs). In 2018, a new group on "Innovation, knowledge and information management" was put together. These forums, although welcomed within the organization, will need some time to become more established and to achieve levels of attendance that will truly boost learning within the organization.

Self-assessment score: 3

C. We lead by example

1. How does your organisation demonstrate excellence in your strategic priorities?

ARTICLE 19 is a leader in the field of Freedom of Expression and Right to Information. ARTICLE 19's staff, and in particular the thematic leads and the Heads of Law and Policy, Communications, and Programmes, lead, collaborate and participate in a number of initiatives, fora and working groups. Some examples of leadership in our strategic priorities (Civic Space, Media, Digital Space, Protection and Transparency) are the following:

ARTICLE 19 is the key organization organizing submissions and contributions to resolutions at the United Nations on Freedom of Expression. We act as a main source of information and convener for organisations engaged in press freedom, digital rights and right to information in particular. Working closely with the UN Special Rapporteurs on Freedom of Expression and Freedom of Association and Assembly, we have contributed to their annual reports on key issues by convening regional consultations the feed into these reports. In 2018, we have also launched, with six other press freedom organisations, the "Reporting Attacks on Expression" platform, designed to feed information on attacks against journalist and activists into the UN Special Rapporteurs in a more timely and coordinated manner.

A key strategic priority for the organization has been the incorporation of human rights principles into technology infrastructure and governance policies. ARTICLE 19 is the leading organization in this field, chairing working groups at ICANN, the Internet Engineering Task Force, and the IEEE, while participating at an intense level in the Partnership on AI and the International Telecommunications Union civil society working groups.

Our work at the cutting edge of technology and FOE is also reflected in other engagements:

- ARTICLE 19 actively contributed to the consultations organized by the AGCOM, the Italian Telcom and media regulator, on hate speech and non-discrimination. ARTICLE 19 contribution was mentioned in the resolution accompanying the final text of the regulation, and several ARTICLE 19's comments were taken on board in that text.
- ARTICLE 19 contributed to the new Manifesto of the OSEPI-BEUC, an initiative for a Human-Centric Digital Manifesto for Europe. The Manifesto, broadly reflecting ARTICLE 19's position on the relevant topics, has been circulated among the various relevant directorate generals of the European Commission and will be further debated in meetings among CSOs that contributed to the drafting and European Commission and other EU institutions' officials.
- ARTICLE 19 also participated in discussions for competition policy worldwide, in particular at the OECD, International Competition Network (ICN) and UNCTAD. These included speaking at the event at the OECD competition week in Paris. ARTICLE 19 was selected to act as a Non-Governmental Advisor for DG COMP within the ICN. This opens opportunities for advocacy and capacity building of the working group.
- ARTICLE 19 contributed to the review of Twitter's Terms of Service during 2018 and some of our recommendations have been taken on board. This resulted in the Terms of Service being clearer and better structured for the benefit of their users.

Finally, Team Transparency of ARTICLE 19 chairs and participates in several working groups and networks among them:

- Transparency Group at BOND: ARTICLE 19 chairs this group and contributes to the following work areas: Anti-Corruption, Development and Environment, Funding, Gender, MEL;

- UNCAC Civil Society Coalition: ARTICLE 19 chaired this group during 2018.
- As a collaborator, ARTICLE 19 participates in WIN - Whistleblowing international network; the Women's Group of UN SDGs – (NGOs major group) and UNECE Women's major group.

Self-assessment score: 4

2. What evidence you have to show that your expertise is recognised and welcomed by your peers, partners and other stakeholders?

ARTICLE 19's leadership has been increasingly recognised by peers, partners and stakeholders. We have also developed close partnerships with a number of international and regional institutions such as: the Special Rapporteurs and Representatives at international (UN) and regional levels; the African Commission on Human and People's Rights (ACHPR) and the Inter-American Commission on Human Rights (IACHR) among other.

Human right defenders (HRD), marginalised groups and young activists also value our expertise. For example, in Tunisia, ARTICLE 19 has trained youth activists in campaigning and defending freedom of expression and identifying and rejecting hate speech. In this project, one of our campaigner trainees said: "This [project] is a real model to engage youth in building a young free new Tunisia that we always have dreamed of, in addition to practice our right in decision-making and driving change in our communities".

Our status and expertise is also reflected in the number, diversity and calibre of international and national partners, number of successful project bids that result in increasing income, number and diversity of successful projects and number and profile of staff working in our institution. We also have a growing network of contacts at different levels.

Self-assessment score: 4

3. How does your organisation practice being inclusive and protecting human rights, including promoting women's rights and gender equality, in accordance with commitments 1-2?

ARTICLE 19 work is rooted in a comprehensive understanding of international human rights law and policy and the ability to translate international standards into national contexts. We know that comprehensive inclusion is the key to counterbalance growing trends that attack the freedom of expression and right to information. ARTICLE 19 works with vulnerable communities and excluded groups women, excluded ethnic groups and LGBTQI groups.

ARTICLE 19's strategy and approach for finding inclusive solutions to defend Freedom of Expression for all, the Mx Method, aims to prioritise gender mainstreaming in our programming, global operations and in our internal policies and practices. During the reporting period, ARTICLE 19 has delivered projects with the main focus of women's inclusion, such as: #SpeakingUp: Freedom of expression to counter balance technology related violence against women in Mexico, Brazil and Kenya. We have also run campaigns such as: #Speakout4LGBT to stand up to hate speech against LGBT people in Central Asia.

Mx Method targets are also being set every two years as a part of the XPA Planning process, to ensure gender mainstreaming is appropriately considered within our global and regional plans.

With the Mx Method strategy and more work focusing on participation and inclusion of more vulnerable groups, the organization have made a big step forward in this area. However, we still need to develop more specific and culturally appropriate entry points to systematically mainstream gender and ensure diversity and inclusion across our work. ARTICLE 19 will be working on this during 2019 and 2020.

Self-assessment score: 3

4. How do you minimise your organisation's negative impacts on your stakeholders, especially partners and the people you work for? How does your organisation protect those most susceptible to harassment, abuse, exploitation, or any other type of unacceptable conduct?

We have policies in place to protect staff and associated parties which outline what is and what is not acceptable behaviour, how to report any concern or misconduct and the repercussions of these acts. Our policies and related documents include:

- Code of conduct
- Disciplinary and grievance procedure
- Sexual harassment Policy
- Bullying and harassment policy
- Safeguarding policy
- Whistleblowing policy (internal and external reporting options)

At the stakeholder level, we require that our delivering partners and relevant stakeholders adhere to these policies and procedures when the partnership starts and the relevant conversations with implementing partners take place at Due Diligence level. Likewise, the relevant clauses have been added to our implementing partners' contracts. Finally, we are starting to run sessions to discuss and clarify these policies and procedures at the project start-up stage during meetings and training sessions to ensure compliance.

We are also currently drafting a new Do No Harm policy which should be ready by 2020. In the meantime we are using the donors' Do No Harm policies as appropriate.

Self-assessment score: 3

5. How do you demonstrate responsible stewardship for the environment?

As a human rights organisation, ARTICLE 19 understands that we are accountable for the environmental impact our work might have now and in the future. ARTICLE 19 has an environmental policy but it is slightly dated and needs review. The updated policy will be ready in 2019 and will look at points such as preferred modes of transportation and frequency of travel, energy consumption and sourcing in the offices, purchase, use and disposal of electric and electronic equipment, printing and waste reduction.

At present, the International office has introduced measures that minimise the organisation's carbon print such as:

- Use of train to work-related travel to cities where it is available
- Introduction of centrally controlled thermostats set to 19 degrees set from 8 to 5 on week-days and switch off on week-ends
- Infra-red lights installed in toilets so they switch on when people enter

- All bulbs are energy efficient
- Our building subscribes to Good Energy which is a 'green' energy provider
- Staff are continuously reminded to switch off their computer in the evening
- Energy efficiency is a consideration for us when purchasing new electrical equipment
- Transport for London have installed a bicycle hire scheme outside our office that allow members of the public including staff to hire bikes for short or long journeys for a small charge
- ARTICLE 19 offers a bike loan scheme to staff
- All our printers have double-sided, black and white printing as a default
- We are introducing our new cloud storage and this will allow us to print less
- We have started to reduce the number of publications we print and ensure that all our publications are available in a digital format
- We recycle all our computers and laptop by donating to a charity or recycling its parts

Self-assessment score: 3

Cluster B: Our approach to change

D. Key stakeholders are identified with great care

1. Please list your key stakeholders. What process do you use to identify them?

Article's 19 main stake holders include:

- Journalists and other media actors
- HRD and campaigners
- HR and Media lawyers
- Media regulatory bodies
- Policy makers
- Parliamentarians and other government officials
- National and local Governments
- Internet regulatory bodies, Internet governance and technical standards bodies
- Private sector organisations such as: internet and telecommunications companies
- Donors
- Multi-lateral organisations
- Local NGOs and CSO in different sectors
- Marginalised groups: LBGT, indigenous communities, religious minorities
- Youth/students

(Please see page 15 for a more comprehensive table of ARTICLE 19's stakeholders per thematic area).

We identify our stakeholders through different approaches:

- At the regional level, working with our Regional Offices and their partners who will lead on the identification and selection of stakeholders in the region.
- At international level, ARTICLE 19 identifies and reaches out to other international players working in FoE and RTI.

- Many stakeholders reach out to ARTICLE 19 because of our reputation and leadership in the field for collaborations, coalitions and partnerships.

Self-assessment score: 3

2. How do you ensure you reach out to those who are impacted or concerned by your work?

ARTICLE 19 ensures that we reach those impacted and/or concerned by our work by actively identifying and engaging with other leader organisations and key individuals at international, national and local levels. We also look at our distinct expertise and added value and engage with organisations that complement our work with a view to increase impact.

We have developed and apply a “Theory of Engagement” that seeks to take local experience and knowledge, (including communities’ needs) and drive them to the international level, informing key decision-making processes and power-holders. These processes can then be used at the national level, creating enabling environments for the exercise of the freedoms of expression and information.

At project design level, policy development and campaigns planning, we develop stakeholder analysis to identify the needs and interests of all stakeholders including our direct and indirect beneficiaries. The project goals and outcomes will state the change the project aims to achieve and these are monitored and measured throughout the project’s life cycle.

Self-assessment score: 3

3. How, specifically, do you maximise coordination with others operating in the same sectoral and geographic space with special reference to national and local actors?

ARTICLE 19 regional offices work on the ground, actively networking in the sector so we can engage and collaborate with all the relevant national and local actors maximising coordination and avoiding duplication of efforts. We seek to complement, rather than replace, other actors working towards the same objectives. Our offices work across a wide range of countries and cultures, with a diverse range of peoples and in varied economic, social and political systems. ARTICLE 19 mainly implements contracts through local NGOs who have the local knowledge. Finally, ARTICLE 19 implements large and complex projects in consortia with other international NGOs and their own set of local partners. Working in this way allows clear definition of roles and responsibilities, outputs and outcomes expected by every stakeholder, ensuring coordination and multiplying collaboration.

Self-assessment score: 3

E. We listen to, involve and empower stakeholders

1. What avenues do you provide your stakeholders to provide feedback to you? What evidence demonstrates that key stakeholder groups acknowledge that your organisation is good at listening to and acting upon what you heard?

ARTICLE 19 actively gathers feedback from stakeholders. We encourage feedback, formal and informal from the people we work with. We do this through regular stakeholders’ meetings, but also informal

chats. We analyse the feedback and discuss with all the projects' stakeholders what changes can be made to address the feedback. We also gather lessons learned during at the end of the projects.

We invite and act upon people's feedback gathered from our activities to ensure our work have the results in the long-lasting change that we collectively want to see. Our teams already employ face-to-face mechanisms, such as focus groups, post-activity feedback forms, training participant satisfaction surveys and tracking the dissemination of training materials. We continue to work to further develop feedback tools suited to contexts, characteristics and needs of beneficiaries, such as mechanisms that do not require literacy, are gender appropriate (asking the right questions and appropriately disaggregating findings), low cost, and familiar to beneficiaries in their daily lives.

Examples of some of the changes that took place as a result of the feedback received can be found below.

- Feedback from protection trainings in Brazil highlighted the need to conduct trainings with police officers, as they are key security stakeholders during protests.
- Feedback on journalist protection trainings in Russia prompted us to adapt training packages to different global contexts.
- In Brazil, feedback from Right to Information trainings revealed that beneficiaries in remote rural areas struggled with our written materials, so we switched to focus groups and made Right to Information and FoE materials more accessible by using traditional Brazilian folklore.

Even though there is a commitment to feedback gathering at ARTICLE19 and much progress has been made in this area, we need to ensure that this is done systematically for every project and that the feedback provided informs our future work.

Self-assessment score: 2

2. What evidence confirms a high level of stakeholder engagement in your activities and decisions from beginning to end?

ARTICLE 19 engages with its stakeholders systematically throughout the delivery of the project through:

- Stakeholder Analysis
- Due Diligence
- Drafting and signing of contracts and agreements
- Risk Management discussions
- Projects' start-up meetings
- Projects regular progress meetings
- Projects' closure meetings
- Lessons learned meetings

On the whole, ARTICLE 19 has a high level of stakeholder engagement. Here below is a list of our main stakeholders and how we engage with them.

Thematic Area	Key stakeholders	Engaging approaches
Civic Space	CSOs, journalists and other media actors, members of social movements,	Awareness raising, sensibilisation, training, skills development, provision of tools,

	HRDs, rural (including) indigenous communities, religious groups, community leaders, other leaders, youth students, media workers, parliamentarians and other government officials, police officers.	policy development and legal support; coalitions and collaborations to encourage and defend civic participation through protest and open debate and to generate greater understanding and knowledge on the concept of countering violent extremism and hate speech.
Protection	CSOs, journalists and media workers, media houses, environmental HRD, government officials, UN Treaty bodies, other organisations that provide emergency assistance.	Protection training, tools, procedures, support, legal support, networking opportunities. We work with government officials and UN treaty bodies to enhance protection for those groups. We collaborate with other organisations that provide emergency assistance to those facing immediate high personal risk.
Digital	Developers and owners of policies, technical standards and instruments so that human rights (including privacy, FoE, RTI) are respected in the digital spaces. Also, internet governance bodies and corporate actors such as ECOWAS, internet and telecommunications companies and Internet governance and technical standards bodies-International Corporation for Assigned Names and Numbers (ICANN), the Internet Engineering Taskforce (IETF), the Internet Research Taskforce (IRTF), the International Telecommunication Union (ITU) and the Institute of Electrical and Electronics Engineers (IEEE).	We pursue and/or influence policy commitments or instruments. We design advocacy campaigns to sensibilise specific groups and the general population on their digital rights. We engage on legal analysis of policies and regulations and on the T&C of internet services provision to protect digital rights. We encourage technical standard-development that respect human rights at key internet standard settings and governance bodies. We advocate for privacy online in keeping ARTICLE 19 Global Principles on protection of freedom of expression and privacy and promote arguments against mass surveillance.
Media	Journalists and media workers including bloggers, media houses, media councils, media house ombudspersons, lawyers working on media freedom, media organisations, media regulatory and self-regulatory bodies.	Training to journalists, provision of tools, support to media organisations and influencing to media regulatory bodies. We strengthen the role of civil society organisations, media organisations and activists to advocate for improved media pluralism, freedom and accountability through legal and policy support, and coalition building to monitor violations of media freedom and pluralism. We measure and raise awareness about the impact of state financing and public

		advertising in a number of target countries. With our media stakeholders, we run campaigns on decriminalisation of defamation and understanding of hate speech.
Transparency	CSOs, including those working on health, women and environmental issues and with journalists, other media actors, HRDs and whistle blowers and networks and memberships that promote transparency and accountability.	Awareness raising, skills development and sensibilisation. We empower communities to balance the unequal power dynamic between them and their governments, essential for promoting democracy, the rule of law, equal access to various rights and benefits as well as fighting corruption. ARTICLE 19 will also pursue the development and adoption of progressive standards on RTI at multi-lateral bodies.

We are aiming to push across the organization the systematization of stakeholder analysis for every project during the early stages of the planning stage. (At present this does not happen for all projects).

Self-assessment score: 3

3. What is the main positive and negative feedback your organisation receive from the stakeholders? (What are the main likes/dislikes you have received from key stakeholders? How have you reacted to this feedback?)

Stakeholders like working with ARTICLE 19 because of our reputation in the field and because we are a responsive and collaborative partner.

Stakeholders most often complain about the administrative, finance and reporting requirements they acquire when collaborating with us. We explain that we commit to higher levels of compliance to donors when we get a grant from them. While this is for accountability purposes, our partners see the levels of reporting required as an onerous imposition from ARTICLE 19. We have had a couple of instances when stakeholders have considered cancelling a project because of the level of compliance required by some donors. Our reaction has been to support delivering partners and help them to build their capacity where the gaps exist.

Here are some case studies of stakeholder involvement in our projects:

1. ARTICLE 19 has developed interventions and activities for projects in Kenya, at the request of the national authorities to build capacity among the police and local authorities on how to acknowledge and support protesters' rights during protests and demonstrations.

2. In Tunisia, one of ARTICLE's 19 initiatives supported young activists to implement projects developed by them. The participants were extremely happy to receive support to develop their idea. "I felt like the training has taken my life to a whole new level, a higher one. I learned so many new analysing methods and started to see the world from a better perspective. I was so proud that my project "Het el shih" ('Give the truth') was selected for support. [...] I would like to continue to sensitise

people to the risks of hate speech and help them know how to say ‘stop’ to hate speech, in particular in the political discourses of political parties during elections. I have a dream and I want to make it a truth.”

Self-assessment score: 3

4. How do you know that people and partners you worked with have gained capacities, means, self-esteem or institutional strengths that last beyond your immediate intervention?

At the beginning of the project we carry out due diligence to implementing partners. We identify gaps that need to be addressed so they can deliver at the level of compliance required by us and our donors. We then plan how to best close the gaps found and actively support partners and their staff to build those capacities.

We know if people and partners have gained capacities, expertise and institutional strength when:

1. They provide us with feedback that confirm that our partnership has increased their capacities and skills. We have started to ask our stakeholders these specific questions at the project closure stage but we need to do this more systematically.
2. When their organisational structure, and specifically financial policies, processes and procedures are in place.
3. When we have been the first partners to discuss and train their staff in policies related to unacceptable behaviour.
4. When they start partnering with other international and national partners for other projects

Self-assessment score: 3

F. Our advocacy work addresses the root causes of problems

1. How do you identify and gather evidence regarding the root causes of the problems you address and use this to support your advocacy positions?

Evidence regarding the root causes of problems is crucial in our programming. It is what decision makers use to understand the core problem. Organisations require evidence of the root causes of problems to convey the scale of the issue firstly and then to identify potential solutions. When we identify an issue we want to advocate about, we make sure that it has strategic alignment with our priorities. We then have discussions with regional and thematic experts in ARTICLE 19 and other organisations, potential partners, individuals and target groups identified by ARTICLE 19 advocacy work. Such discussions help to shape the core issue that the work will address and to consider appropriate solutions to the problem.

Evidence is gathered in 3 ways: desk research, interviews from activists who are directly impacted by the problem that we address and surveys filled out by stakeholders for baseline and monitoring purposes. Some teams use techniques such as the problem tree analysis, but the use of these tools is not consistent across teams.

Self-assessment score: 3

2. How do you ensure that the people you work for support your advocacy work and value the changes achieved by this advocacy?

Ownership and transparency are very important in advocacy. We organise calls with the core groups when designing strategies. We also host workshops with core group of stakeholders who we believe will benefit and add value to our campaign aim and objectives. During the workshops, it is vital to listen to everyone's perceptions, identify and analyse the strengths, weaknesses and risks that we will encounter while delivering the campaign or the project. This newly formed group then help to develop the strategy and the work plan for the implementation looking at specific cultural and political contexts from the point of view of the beneficiaries. Without getting the buy-in from the people that understand the issue, our advocacy work would have no value.

Self-assessment score: 3

G. We are transparent, invite dialogue and protect stakeholders' safety

1. Are your annual budgets, policies (especially regarding complaints, governance, staffing/salaries and operations), evaluations, top executive remuneration and vital statistics about the organisation easily available on your website in languages accessible by your key stakeholders?

We publish our annual audited financial statements, and key information about ARTICLE 19 and its Board in English. We are members of IATI and will start publishing projects data more extensively from 2019. This is the link to the data we have published:

<http://www.d-portal.org/ctrack.html#view=search&publisher=GB-CHC-327421>

In terms of complaints mechanism, we have developed a feedback form where people will be able to provide positive and negative feedback, but we still have not uploaded the form in our website. We are in the process of having in place a system to receive, channel and follow up the complaints. This is one of our accountability priorities. See Annex 1.

Self-assessment score: 2

2. What policies do you have in place to ensure a fair pay scale? Do you measure the gender pay gap in your organisation, and if so what is it? What are the salaries of the five most senior positions in the organisation, and what is the ratio between the top and bottom salaries? If this information cannot be provided or is confidential, please explain why.

We have salary scales in place in each of our offices along with a Performance Evaluation System policy that covers how salaries increase over time. We also have a promotion policy and an acting up policy. All staff are appraised annually. We do not currently measure the gender pay gap in our organization.

In terms of the ratio between the top and the bottom salaries, this is difficult to provide given we operate globally and the salaries we offer are competitive for the country of operation and therefore difficult to compare. If we look at the UK as an example, the salary at the Assistant level is £30,854 to £35,486 and the Director is level £64,428 to £74,096.

Self-assessment score: 2

3. How do you ensure privacy rights and protect personal data?

ARTICLE 19 is fully GDPR compliant. We only collect data when website users register to receive updates. All data collection is subject to our Data Protection Policy. We regard the lawful and correct treatment of personal information crucial to upholding our values of Accountability and Transparency. We ensure that we treat personal information lawfully and correctly. The ARTICLE 19 Data Security Policy outlines our undertakings with regard to compliance with data protection law and is designed to support. The Policy highlights the following points:

- Compliance with data protection law and good practice
- Protection of privacy rights of supporters, beneficiaries, partners and staff
- Openness with regards to how we handle confidential and personal data
- Management of risk related to data collection and storage
- Standards of good practice in accordance with our publicly stated principles

At strategic level, our Digital Team and Law and Policy colleagues actively work to push and promote regulation and standards for internet providers in order to protect privacy of internet users, at a global level. ARTICLE 19 has two global outcomes that relate to the right of privacy on line.

Self-assessment score: 3

4. Who are the five largest single donors for the period and what is the monetary value of their contribution? Where private individual donors cannot be named due to requested anonymity, please explain what safeguards are in place to ensure that anonymous contributions do not have unfair influence on organizational activities.

ARTICLE 19 largest single donors:

Donor's name	Contribution during 2018
SIDA (Swedish International Development Agency)	£1,816,000
OSF (Open Society Foundation)	£ 892,000
EC (European Commission)	£ 694,000
Norwegian Ministry of Foreign Affairs	£ 571,000
Ford Foundation	£ 463,000

ARTICLE 19 has a minimal number of individual donors, less than 20. While there is a section on the website that invites visitors to make donations, we have not received any contribution above £300 and no conditions or opportunities to influence the activities of the organization are attached to the donations. We work mainly with institutional donors.

Self-assessment score: 4

Cluster C: What we do internally

H. Staff and volunteers are enabled to do their best

1. Provide evidence that recruitment and employment is fair and transparent

ARTICLE 19 is striving to be an equal opportunity employer. We ensure that no job applicant or employee receives less favourable treatment on grounds such as race, colour, nationality or citizenship, ethnic or national origins, religion, sex or gender identity, marital status, age, disability or health status, sexual orientation or is disadvantaged by conditions or requirements which cannot be shown to be justified.

See below some examples of ARTICLE 19 hiring principles to ensure fair and transparent recruitment:

- All permanent posts will normally be advertised externally and in such a way as to reasonably ensure that the vacancy is brought to the attention of disadvantaged (or vulnerable) or ethnic minority applicants.
- The criteria contained in the personnel specification is strictly relevant to the requirements of the job and not be unnecessarily restrictive so as to exclude particular groups, since this may constitute indirect discrimination and therefore be unlawful.
- Where a particular number of years of experience are requested this must be objectively justified as such criteria may rule out younger people who have the skills required but have not had the opportunity to demonstrate them over an extended period.
- Where specific qualifications are required for a post these are not to disadvantage people of a particular age or culture. For example, a requirement for university degree should be broadened to include equivalent qualifications that may be held by different age groups or cultures. Any request for specific qualifications that could disadvantage people of one age or culture compared with people of others must be justified in objective terms.

In addition, we are developing our recruitment policy which will formalize and strengthen our safeguarding in recruitment.

Self-assessment score: 3

2. What are you doing to invest in staff development? What indicators demonstrate your progress? What are your plans to improve?

ARTICLE 19 made good progress in terms of staff development as during the reported period HR was allocated a centralised budget specifically to invest in staff development. This includes training for staff in developing their organisational skills such as time management, conflict resolution and essential skills for emerging managers. It also includes leadership skill development for senior management.

We have also further developed our performance management system to include staff personal and professional development by evaluating the training undertaken during the appraisal period and identifying the training needs for the next appraisal period which includes a training needs assessment.

Additionally, the performance management system guides staff in developing their personal development plan and ensuring that they are aware of developing opportunities within the organisation so that they can make the best use of those opportunities.

Finally, in addition to the staff development budget allocated to HR, and in relation to the trainings required for delivery of our strategy, teams are allocated a budget so that their staff can develop relevant skills by undertaking training linked to the strategic output required.

Self-assessment score: 3

3. How does your organisation ensure a safe working environment for everybody, including one free of sexual harassment, abuse, exploitation or any other unacceptable conduct? What indicators demonstrate your progress? What are your plans to improve?

As noted, we have policies in place to protect staff and associated parties which outline unacceptable behavior, its repercussions and how to report it internally. These include:

- Code of conduct
- Disciplinary and grievance procedure
- Sexual harassment policy
- Bullying and harassment policy
- Safeguarding policy
- Whistleblowing policy (internal and external reporting options)

All staff are expected to attend training on the above policies. Our HR team has been travelling to all regional offices to build capacity and ensure policies are suitable for the local context.

Our plans to improve include the introduction of trained ‘confidential helpers’ who are staff based in the UK office (and soon to be in regional offices) who are available to staff who have witnessed or experienced harassment, abuse or exploitation. We are also introducing confidential email addresses monitored by HR for both safeguarding and whistleblowing matters. How to report is clearly stated in the policies and will also be presented on posters in shared spaces in our offices. These posters will be rolled out globally in 2019.

Furthermore, we are currently working with external consultants to undertake a culture review globally which involves a number of staff representatives from across the globe. This will help us to identify where we want to be in terms of culture and develop a roadmap and plan of how to get there, and will include reviewing our values and behaviours.

Self-assessment score: 3

I. Resources you have handled effectively for the public good

1. How do you acquire resources in line with your values and globally-accepted standards and without compromising your independence?

ARTICLE 19 commits to ensuring that all donations further our mission. We respect the rights of donors and the dignity of people affected by our fundraising activities. This requires:

- Implementation of policies and processes that ensure independence, including fundraising materials which adequately describe our work and needs
- donations are effectively used to further our organisation’s mission;
- donor compliance levels are honoured;
- where donations are made for a specific purpose, donors are adequately informed on results
- publication of details of all major institutional gifts and gifts-in-kind, clearly describing the valuation and auditing methods used;
- adherence to own practices regarding donations received through third parties.

ARTICLE 19 donors seek to advance freedom of expression and right to information in the geographical and political contexts where ARTICLE 19 works.

ARTICLE 19 fundraising strategy is aimed at pre-defining fundraising opportunities by working closely with donors to influence the goals they set for their grant making both centrally and via their national representations. This holistic approach will be based on ARTICLE 19's triangulated and coordinated fundraising effort, underpinned by close internal information sharing and consistent decentralised communication with donors.

In order to ensure that ARTICLE 19 is both politically and financially independent we require:

- Governance, programmes and policies that are non-partisan, independent of specific governments, political parties and the business sector
- Effective systems and practices to prohibit, prevent, detect and report on corruption, bribery and conflict of interest by staff or other persons working for or on behalf of the organisation;
- Disclosure of donor identities, especially when the size of their donation(s) is such that it could be seen to compromise our political or financial independence.

ARTICLE 19 is currently in the process of systematizing this through developing an ethical fundraising policy.

Self-assessment score: 3

2. How is progress monitored against strategic objectives, and resources re-allocated to optimise impact?

We embed monitoring, evaluation and learning (MEL) in all aspects of ARTICLE 19's project management cycle. ARTICLE 19 builds regional MEL capacity and supports regional teams with their reporting towards projects and regional strategy outcomes as appropriate. Some teams have the skills and confidence to deliver MEL effectively and independently. We have implemented a project management and strategy tracking system called AIMS across the entire organisation which allows for transparency among and between teams on our progress against outcomes and targets. It also allows for strategic review of our progress at a senior level to better align resources where they are needed.

Central MEL services for teams: centrally located MEL post delivers an advisory function to project teams, who are responsible for overall MEL design and implementation, when necessary. The MEL officer supports project teams with the following resources:

1. ARTICLE 19's MEL toolkit: The toolkit supports project design, monitoring and evaluation.
2. MEL Resource Page: An online resource of all MEL tools, more specific guidance of MEL approaches and other key documents.
3. Project reviews: Some complex projects have a mid-term and an end term review.
4. Quarterly Surgeries: Provide quarterly meeting opportunities for teams to engage with the MELofficer, forum for communication with teams, and a routine support structure.

Self-assessment score: 3

3. How do you minimise the risk of corruption, bribery or misuse of funds? Which financial controls do you have in place? What do you do when controls fail? Describe relevant situations that occurred in this reporting period. What are your plans to improve?

ARTICLE 19 has an anti-corruption and bribery policy in place. Training for all staff on this policy has been delivered in 2018. Other relevant policies are being developed in 2019. We have many financial controls in place and the key ones are as follows:

- Separation of duties between (a) the person ordering a good and service, (b) the person processing the expenditure, (c) the person making the payment and (d) the person reconciling the bank. The smallest finance team we have across the organization is two, so the above is the minimum separation, apart from the case where the finance team is also requisitioning the goods or service. In larger teams, further separation is achieved. All payments require two signatories/authorisers.
- Changes in bank details are verified back to the supplier using a separate means of communication. Changes to regional office and partner bank accounts must be verified by bank documentation.
- Expenditure authorisation limits, linked to the budget, and personal expenditure approved by a higher authority.
- Maximum levels of petty cash and cash payments (depending on the circumstances of each office), and a move towards electronic payments in 2019.
- Separation of duties between HR and Finance in the International Office and other larger regional offices including: sending of remittance advices to suppliers; sending payment receipts to regional offices and partners; and a requirement to confirm receipt of the funds.
- Use of a double-entry accounting system where balances are reconciled on a monthly basis, and which are in turn used for reporting to donors. Different user profiles in the accounting system and restriction on changes to these access rights.
- Inventory of physical assets, checked on an annual basis.
- A review process for reporting from regional offices, with a review of balance sheet and variance analysis of income and expenditure, on a monthly basis.
- Sampling against supporting documentation for regional offices and partners on a regular basis. Documentation is stored in the accounting system against transactions.
- Independent review of journal posting.
- Annual audit, with follow up of control weaknesses, and audits by project donors, including audit under the US Single Audit rules and EC audits.
- IT security policy protecting against unauthorised access to data by external parties.

When in spite of the above, controls fail, the way in which we deal with a situation depends on the circumstances, in particular the nature of the failure, the reasons why, the impact and mitigation measures required.

With regards to plans for the future, ARTICLE 19 intends to introduce the procurement policy across the organisation and to improve the implementation of some of our existing policies, in particular due diligence and sampling. We also plan to introduce a purchase order system in 2020.

Self-assessment score: 3

J. Governance processes maximise accountability

1. What is your governance structure and what policies/practices guide replacing and recruiting new trustees/board members?

ARTICLE 19 is governed by a General Assembly and International Board, with responsibility for setting the mission and vision and agreeing on the overall strategy for the organisation. Trustees are appointed as independent, recognised experts in their fields, which include thematic expertise like media freedom and human rights, as well as functional expertise in areas such as fundraising, finance, and security. The trustees are recruiting through referrals and proposals from active board members and through research conducted by the Governance Committee of the International Board. When a list of names and CVs has been compiled by the Committee, the interested candidates are interviewed by the CEO and by a member of the Committee (frequently the Chair). The Committee then makes a recommendation on appointments to the International Board. The decision on the new appointment has to be approved by the General Assembly. When there is a requirement for a specific type of expertise or knowledge this will be outlined in the selection criteria.

ARTICLE 19 is headed by an Executive Director who reports to and is appointed by the International Board. At an operational level, the Global Management Team (GMT), comprised of the Executive Director, the Senior Management Team (Directors based at the International Office) and the Regional Directors, is the senior decision making entity for the global organisation.

The International Board is overseen by the General Assembly. Regional Boards have a member of the International Board appointed to it, whilst the chairs of the Regional Boards all sit in the General Assembly, along with the members of the International Board. The Board has a Governance Committee charged with reviewing and overseeing the governance relationships between the International Board and Regional Boards of the organisation.

The International Board meets twice a year to review ARTICLE 19's progress on our operational plan and financial stability and procedures. Strategic-level decisions are referred to the Board for discussion and agreement at these meetings. The Finance and General Purpose Committee (FGPC) meets monthly to discuss and agree operational and financial issues that rise to the level of Board oversight. The FGPC reviews all quarterly management accounts, while the full Board reviews the management accounts during bi-annual ordinary meetings. Organisational accounts, including those of ARTICLE 19's regional offices, are audited by an independent audit firm on an annual basis.

Self-assessment score: 3

2. How does your board oversee the adherence to polities, resource allocation, potential risks and processes for complaints and grievances?

Care, compliance and prudence are the main statutory duties of ARTICLE 19 trustees. This means that the board of trustees have and must accept the ultimate responsibility for directing the affairs of ARTICLE 19, including adherence to policies, ensuring that resource allocation is efficient, ensuring that potential risks are properly managed and overseeing that there are systems in place to deal with complaints and grievances. (See question 3 in page 21 above.)

The main avenue for overseeing operational risks and resource issues is the Finance and General Purposes Committee of the International Board, as mentioned above. The Committee reports back on key discussion and issues to the International Board on an as-needed basis, no less frequently than twice a year at the International Board meetings. Our grievance policy provides an avenue to appeal directly to the International Board, and this process is overseen by the Trustee with the most senior human

resources expertise. The risk register is reviewed multiple times a year by the FGPC and annually by the International Board, with discussion to move this to a regular standing agenda item on all Board meetings.

All organizational policies are reviewed and approved by the Board before they are implemented.

Self-assessment score: 3

3. What processes and mechanisms does your organisation have in place to handle external complaints including those relating to unacceptable conduct of your staff, volunteers, or partner organisations? (Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.)

Based on the recommendation provided by Accountable Now, we have made our whistleblowing policy available on the website. This policy provides clear guidance on how to report concerns both internally and externally. Aside from phone discussion with nominated focal points we also have the confidential email addresses mentioned previously which are monitored by HR. We are aware that we need to have an external complaints mechanism and our policies in a more visible place in the website. However, because our website is entering into a new phase of development and this will not be concluded for some time, we will upload a feedback form that we have already put together in ARTICLE 19's website in late autumn this year (2019)

During the reported period, we did not receive any external complaints.

Self-assessment score: 2

4. How are internal complaints handled? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.

ARTICLE 19 has a number of policies to deal with complaints made internally. Those include, disciplinary and grievance procedure, sexual harassment policy, bullying and harassment policy, safeguarding policy and whistleblowing policy.

At the International Office and during the reported period, ARTICLE 19 received 5 formal complaints. They were valid. They were thoroughly investigated and decisions were taken.

Self-assessment score: 3

5. How do you make decisions about the need for confidentiality and protecting the anonymity of those involved?

Our sexual harassment and whistleblowing policies and our grievance and disciplinary procedure outline how confidentiality is managed. In the instance of sensitive cases, such sexual harassment, we take a victim first approach, giving the power to the individual in terms of how the anonymity of their complaint is handled.

In all cases of complaints, regardless of the nature, during the investigation the utmost confidentiality is maintained and information is shared on a need to know basis only.

Self-assessment score: 3

K. Leadership is dedicated to fulfilling the 12 Commitments

1. How is the governing body and management held accountable for fulfilling their strategic promises including those on accountability?

ARTICLE 19's government body and ARTICLE 19 Senior Management Team is held accountable for the delivery of the strategy outcomes, including the one that focuses on accountability. They monitor the progress of the global strategic outcomes regularly, understanding the challenges around its achievement and cascading support to the relevant teams so this outcomes are achieved.

ARTICLE 19's governance structure aims to ensure that we are effective in achieving our mission, using our resources to maximum effect and upholding our core values and has proved to be instrumental to enhance better communication and collaboration across the organisation.

The Board reviews our progress against the strategy annually at the Board Meeting, providing feedback to senior management. This is based on the information that our Annual Review Process (mentioned above) generates. External evaluations on our progress against the strategy have been conducted every 3 years to assess our progress, which is shared with the Board. Additionally, the Board periodically commissions an external review of their governance.

Self-assessment score: 3

2. What steps have you taken to ensure that staff are included in discussing progress toward commitments to organizational accountability?

ARTICLE 19 staff is aware of our commitment to accountability and they actively contribute to the 12 commitments. We have principles and practices to reinforce accountability as this essential for our legitimacy, the quality of our work and the trust that we depend on. Accountability is more than a retrospective assurance mechanism. It defines what we are to be held accountable for, influences what we want to achieve and how we work.

By being members of this Charter, we seek to promote the accountability that we stand for and commit ARTICLE 19 to respecting its provisions.

However, while all staff is committed to accountability as one of our core values, and to its principles and practices, not all the organization is aware of the specific Accountability Now 12 commitments or fully understand why we need to report and be assessed on our accountability compliance levels on a regular basis. We consider that we need to start more comprehensive discussions with different members of staff on the benefits of our organizational accountability can be ascertained and advanced.

Self-assessment score: 2

3. What is your accountability report's scope of coverage? Are you reporting for the whole organisation or just the international secretariat? For secretariats of international federations, on which issues of accountability (or relating to Accountable Now's 12 commitments) do your members

report to you on, and with what frequency? Where there is no routine reporting, how do you use your coordinating functions to elevate attention to accountability issues throughout your federation?

The coverage of this report is for all the organization. Accountability is one of our core values. Across the organization, there is consensus on the need to be accountable and to demonstrate accountability both internally and externally. While the regional offices do not report periodically on the 12 commitments, they are all embedded either in our strategy, in our policies and processes or in other aspects of our work. Regional Directors actively contribute to the Annual Report by providing the relevant information and are a part of global management structures. However, due to availability of information, some of the sections of the report e.g. environmental and finance sections, bear more focus on the international office.

Self-assessment score: 2

Annex 1

Update on the improvement areas identified in the Accountability Report for 2017 by the Accountable Now Independent Review Panel.

The following information was required after the submission of the previous report and its follow-ups. Here is a new update:

- 1) Information on the financial compensation of the highest governance body, senior managers and executives.

ARTICLE 19 prefers not to disclose salaries information, because we are committed to staff consultation.

After receiving your request, a consultation took place among staff, and they let us know that they did not favour to publish this information. However, in question 16, we have provided information on the top and bottom salaries at the International Office.

- 2) Mechanisms for feedback and complaints

ARTICLE 19 has not been able to develop and put in place a mechanism for feedback and complaints yet. However, progress has been made:

- A feedback form has been developed and approved
- A mechanism has been put in place to receive the electronic/post or phone complaints and to channel them to the right department for follow-up
- A person in HR has been appointed to receive the complaints and to channel them with the confidentiality that the case requires.

At the moment, the whistleblower policy provides information on how to raise a complaint, but we feel that an electronic form to do so should be placed in a more visible part of ARTICLE 19 website. However, the website is being reviewed and updated in the Autumn of 2019 and this is when the form will be uploaded. We will keep you informed.

- 3) Update on ARTICLE 19 Fundraising Strategy

We have a new Fundraising and Partnership Strategy for 2019.