



**Accountable
Now**

GLOBAL STANDARDS LOCAL TRUST



ARTICLE 19

Independent Review Panel Feedback

Accountability Report 2018

Review Round December 2019



ARTICLE 19

Feedback from the Independent Review Panel

Review Round December 2019

13 January 2020

Dear Tom Hughes,

Thank you for submitting your accountability report. We, the Independent Review Panel of Accountable Now, appreciate ARTICLE 19's efforts to 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.

ARTICLE 19's seventh report (and the first using the new reporting questions) is comprehensive for the most part, easy to read, and demonstrates improvements in certain areas. In general, the report indicates a commitment to accountability within the organisation, and a number of sound policies and processes. We also appreciate the reflection and identification of points for improvement, and the sharing of future plans.

ARTICLE 19's explanation of their excellence on strategic priorities (C1) is highlighted as a good practice. Further **strengths** in this report include ARTICLE 19's approach to learning (B2), ensuring privacy rights and protecting personal data (G3), staff development (H2) and safe working environment (H3).

Areas for improvement to address in the next interim report are ARTICLE 19's approach to inclusivity/diversity beyond gender (the latter of which is actually a strong point for ARTICLE 19) (C3), more details and examples regarding minimising negative impacts on stakeholder (C4), the availability of key policies and documents on the website (G1), and more information and details about external and internal complaints mechanisms (J3 and J4). We do note the progress made on complaints mechanisms compared to previous reports, but believe there is still room for improvement, and have flagged this again as it is one of our key accountability pillars.

Further, the Panel repeats previous requests to make more policies and similar documents available on ARTICLE 19's website, and to provide links in the report. Where this is not possible, a summary of key relevant points of the documents would be helpful. In general, Accountable Now encourages its members to make a wide range of information easily accessible, as this is expected to improve the ability of



stakeholders to engage with the organisation, as well as being good practice in terms of transparency.

The Panel appreciates ARTICLE 19's continued commitment to accountability and engagement to Accountable Now, and looks forward to continuing to follow your progress and work with you on accountability issues.

We look forward to discussing our feedback with you in a follow-up call, which the Secretariat will be in touch to schedule. This conversation will form the basis for your response letter, which will be made publicly available on the Accountable Now website along with your report and this feedback letter.

If you have any other feedback or comments on our work, please share them with us by sending them to the Accountable Now Secretariat.

Yours sincerely,

Accountable Now's Independent Review Panel





ARTICLE 19's Accountability Report 2018

Review Round December 2019

Opening Statement from the Head of Organisation

The opening statement from Executive Director Tom Hughes explains ARTICLE 19's strategic approach to accountability, highlighting the importance of holding themselves accountable, just as they work to hold decision-makers accountable.

The statement outlines the key aspects of ARTICLE 19's work, including inclusion, freedom of expression, and the promotion of transparency and accountability frameworks. In turn, ARTICLE 19 believes in accountability to all their stakeholders, and practices this through participation in accountability and transparency initiatives, and strong policies, systems, and processes internally.

There is reference to the challenges ARTICLE 19 has faced recently due to their growth and corresponding change processes, and the Panel appreciates that these have been discussed openly with donors and staff.

Finally, the organisation's top accountability priorities for 2019 are shared – these are the development of an ethical fundraising policy and improving consistency in collecting and analysing beneficiary feedback.

The Panel commends the fact that this opening statement has a much stronger focus on accountability than in the previous report, and appreciates ARTICLE 19's willingness to work together with Accountable Now to further progress on accountability – the Panel and the Secretariat are happy to provide any support possible.

Cluster A: Impact Achieved

A. The impact we achieve

A1	<p>Mission statement and theory of change</p> <p>The report outlines ARTICLE 19's mission, vision, and theory of change. The latter has three interlinked pillars, including strong laws and policies, the accountability and transparency of power holders, and an active and empowered civil society.</p>	4
A2	<p>Key strategic indicators for success</p> <p>The response provides detailed information on Article 19's strategic indicators and how these were set and are reviewed. The strategy has global and regional outcomes, broad objectives, and more specific targets. See Annex 2 for an overview of goals, outcomes and activities for the period 2017-2020. Donors and partners were engaged in the</p>	4



	<p>development of the outcomes, and a wide range of stakeholders (including beneficiaries) were involved in a review, evaluating progress and proposing changes.</p> <p>The strategy planning process happens every two years, and allows for internal reflection. Teams form Target Operational Plans which allow for detailed planning, proposal development, tracking and reporting.</p> <p>Progress is monitored through a participatory Annual Review Process which includes internal peer review, and through quarterly monitoring of outcomes and targets.</p> <p>Overall, ARTICLE 19's approach appears strong, inclusive and participatory.</p>	
A3	<p>Progress and challenges over the reporting period</p> <p>The report provides information from the Annual Review Process 2018, where progress towards outcomes and targets were assessed by teams. Statistics and a graph depicting progress on international targets are given – in both regards, 70% were deemed to have made “satisfactory” progress or better by the end of 2018.</p> <p>ARTICLE 19's top achievements and challenges are also outlined. Achievements centre around increased communication and engagement with stakeholders and positive changes in media and social media regulations in areas ARTICLE 19 works in. Challenges are mostly related to funding gaps and a lack of in-depth knowledge of local partners' capacities as well as shortage of local experts for specific digital projects. It is stated that ARTICLE 19 is working to find solutions to these issues, and we look forward to an update in the next full report.</p>	4
A4	<p>Significant events or changes regarding governance and accountability</p> <p>ARTICLE 19 has been preparing for Brexit, which will have significant effects on operations, including EU funding. In addition, in 2018 ARTICLE 19 set up the MENA Regional Board, and there were changes to the International Board's membership, which are outlined in the report.</p>	4
B. Positive results are sustained		
B1	<p>Sustainability of your work</p>	3



	<p>ARTICLE 19's two main approaches to sustainable work in 2018 were to improve learning and evaluation practices, and capacity building for partners and human rights defenders.</p> <p>ARTICLE 19 has increased its investment in learning and evaluation, both internally and with other stakeholders. An example is given of ARTICLE 19 initiating evaluation of a SIDA core grant. The response shares that teams have been routinely evaluating work after the end of projects, and are emphasizing the need to follow up with beneficiaries.</p> <p>In terms of capacity building, ARTICLE 19 sees working closely with local partners and providing access to resources and capacity as key to sustainable outcomes. Materials and tools are produced to support civil society actors, and ARTICLE 19 also indirectly engages with awareness-raising and capacity development of civil society, media, networks and coalitions. The report provides figures on the number of people ARTICLE 19 trained in 2018.</p> <p>The report also notes the need to push further when it comes to gathering feedback from stakeholders on changes seen after engaging with ARTICLE 19, in order to gain a better understanding of broader impacts (rather than numbers reached).</p> <p>The Panel appreciates this, and finds ARTICLE 19's approach to be sound. We would also be interested in hearing a bit more about how stakeholders are involved in the implementation of programmes, and how this may lead to longer lasting investment and engagement in the work ARTICLE 19 supports.</p>	
B2	<p><i>Lessons learned in the reporting period</i></p> <p>The response is comprehensive, outlining how ARTICLE 19 collects and shares lessons at the organisational, project, and internal levels, the key learnings from 2018, and steps ARTICLE 19 is taking to address these.</p> <p>Learning topics range from campaign design, participation and influencing public opinion, to diversity and inclusion, communications, and partnerships. The regular Annual Review Process is a very interesting tool as it applies to all the teams.</p> <p>The Panel appreciates the detail provided, the concrete examples, and ARTICLE 19's commitment to continued learning and improvement.</p>	4



C. We lead by example		
C1	<p><i>Excellence on strategic priorities</i></p> <p>The report explains comprehensively and with many examples how ARTICLE 19 demonstrates excellence and provides leadership in the field of Freedom of Expression and Right to Information.</p> <p>ARTICLE 19 provides information to and convenes organisations working on press freedom, digital rights, and right to information. They organise submissions and contributions to UN resolutions and work closely with UN Special Rapporteurs to feed into their annual reports.</p> <p>ARTICLE 19 is the leading organisation on the issue of incorporating human rights principles into technology infrastructure and governance policies, chairing a number of high level international working groups. These are listed, as are working groups that ARTICLE 19's transparency team participates in and chairs.</p> <p>The report also shares ARTICLE 19's contributions to consultations, discussions, and the creation/revision of key documents at national, regional and international levels.</p> <p>The Panel commends ARTICLE 19 and identifies this section of the report as a good practice.</p>	4
C2	<p><i>Expertise is recognised and welcomed by peers and stakeholders</i></p> <p>ARTICLE 19's partnerships with high-level international, regional and national institutions and organisations, as also detailed in the previous question, are one indicator of their expertise being recognised and welcomed. In addition to this, the response refers to the increasing number of successful project bids, as well as the increasing number and profile of staff.</p> <p>The report also mentions that human rights defenders, marginalised groups and young activists value ARTICLE 19's expertise, and an example of positive feedback from a campaigner trainee is provided.</p>	4
C3	<p><i>Inclusivity, human rights, women's rights and gender equality</i></p> <p>The response explains that ARTICLE 19's work is rooted in a comprehensive understanding of international human rights law and policy, and that the organisation works with vulnerable communities and excluded groups.</p> <p>ARTICLE 19's Mx Method, which aims to prioritise gender mainstreaming in programming, operations, policies and practices, and looks beyond the</p>	2



	<p>obvious barriers women and LGBTQI persons experience, has previously been identified by the Panel as a good practice. More detailed information on this is available in ARTICLE 19's 2016 report, pp. 17-20. We encourage ARTICLE 19 to make information about the Mx Method more easily accessible on their website, as this would be of great interest to stakeholders, including peer organisations.</p> <p>The 2016 report had also referred to ethical engagement principles for working with people in vulnerable situations, minimising harm in activities offered, and working to achieve gender balance amongst participants. It would have been interesting to have an update on this, and how ARTICLE 19 is doing on achieving the 50% target.</p> <p>The previous report had also mentioned that all contracts with partners include clauses requiring non-discriminatory and gender perspectives in all activities, which the Panel had commended.</p> <p>The response mentions examples of some projects delivered in the reporting period with a focus on women's inclusion and to counter hate speech against LGBT people.</p> <p>It is stated that there is still a need to develop more specific and culturally appropriate entry points to mainstream gender and ensure diversity and inclusion across ARTICLE 19's work. This is flagged as an area of focus for 2019 and 2020.</p> <p>While the approach to gender issues is strong, the response does not have much information on other forms of diversity, such as race, age, ability, nationality, ethnicity or religion (this is also the reason for the lower score on this question, although the approach to gender is strong). We had requested in our feedback letter on the 2016 report more information on how these factors are addressed in strategy and operations, whether there are targets, and progress on meeting these. This is a point to focus on in the next interim report.</p>	
C4	<p><i>Minimising negative impacts on stakeholders</i></p> <p>The report refers to a number of policies which aim to protect staff and associated parties, including a code of conduct, disciplinary and grievance procedure, and policies on sexual harassment, bullying and harassment, safeguarding, and whistleblowing. None of these policies were linked and we were only able to locate the safeguarding and whistleblowing policies on ARTICLE 19's website (on the accountability page). The key points of relevance to this question were also not</p>	2



	<p>summarised. This makes it difficult to assess the key aspects of the policies, and also reduces the likelihood of ARTICLE 19's stakeholders being able to access and make use of them. We urge ARTICLE 19 to make these policies available online, and to provide links in future reports.</p> <p>The response explains that delivering partners and other relevant stakeholders are required to adhere to these policies and procedures, with relevant clauses added into partner contracts, and discussions and training sessions to ensure partners understand and are able to comply with them. How does ARTICLE 19 follow up on implementation/compliance by partners? The 2016 report had mentioned that partners were required to report on how they have included non-discriminatory and gender perspectives in all their activities, which the Panel had commended. How have partners complied with this request so far? Has it ever worked out or brought any consequence on a partnership ?</p> <p>In future we would welcome some examples or further details to indicate how the policies and procedures mentioned work in practice.</p> <p>This is an area to focus on in the next interim report.</p>	
C5	<p>Responsible stewardship for the environment</p> <p>ARTICLE 19 recognises that they are accountable for the environmental impact of their work, and the response provides several examples of initiatives to reduce this impact. This includes more environmentally-friendly forms of transport such as train and bicycle, mechanisms to reduce energy use in the office, reducing printing and using double-sided, grayscale printing as a default, and recycling old computers. The acquisition of new technologies like cloud storage will reduce significantly the volume of printing.</p> <p>There is an environmental policy but it is stated that this is slightly dated and in need of review, with the updated policy expected to be ready in 2019. As with other policies, we encourage ARTICLE 19 to make its environmental policy available on the website, and to share a link in the next report.</p>	3
Cluster B: Stakeholder Involvement		
D. Key stakeholders are identified with great care		
D1	<p>Key stakeholders and how they are identified</p> <p>The report lists ARTICLE 19's key stakeholder groups. At the regional level, Regional Offices and their partners lead on stakeholder identification.</p>	2



	<p>Some more details on the process would have been welcome, as would some examples of partners identifying other relevant stakeholders. The Panel notes positively that under question E2 of the report, it is stated that ARTICLE 19 aims to systematise stakeholder analysis for every project during early planning stages.</p> <p>At the international level, ARTICLE 19 reaches out to other international players working on the same issues – again, some more information would be helpful here. Are there any criteria used when deciding who to reach out to, or when prioritising who to work with? Is there a periodic review of partners and stakeholders, or is stakeholder identification done on an ad-hoc basis?</p> <p>Finally, the report explains that many stakeholders also reach out to ARTICLE 19 themselves due to their reputation and leadership.</p>	
D2	<p><i>Reaching out to those impacted or concerned by your work</i></p> <p>The response provides a broad overview of how ARTICLE 19 interacts with its stakeholders. They identify and engage with leader organisations and key individuals, considering ARTICLE 19's expertise and added value, and engaging with organisations that can complement their work.</p> <p>There is a Theory of Engagement which seeks to take local experience and knowledge to the international level. It would be interesting to know more about how this is done (how are the experiences gathered; who is taking them to the international arenas?) and about the Theory of Engagement generally - is there a document that can be shared?</p> <p>ARTICLE 19 also develops stakeholder analyses to identify the needs and interest of all stakeholder groups in projects, policy work, and campaigns.</p> <p>In the next full report, more information could be shared around how frequently ARTICLE 19 is in touch with beneficiaries and partners and what methods of communication are used (online, in-person workshops, surveys, social media, etc.). Some information on the latter point can be found under question E2, which outlines how key stakeholder groups are engaged in different thematic areas.</p>	2
D3	<p><i>Maximising coordination with others operating in the same space</i></p> <p>ARTICLE 19 aims to complement, rather than replace other actors working towards the same objectives, and to coordinate and avoid duplication. Their regional offices work on the ground and actively network in order to collaborate with national and local actors, and project implementation is</p>	2



	<p>mostly done through local NGOs. ARTICLE 19 implements more complex projects in consortia with other INGOs and their own local partners, which again allows for coordination and collaboration.</p> <p>ARTICLE 19's approach seems sound, but in the next report we would appreciate an example to demonstrate how this works in practice – could you share some more details from one of your partnerships? We would also like to know what shared principles/commitments are integrated into partnerships, such as clauses around non-discriminatory and gender perspectives, as mentioned above under C3.</p>	
<p>E. We listen to, involve and empower stakeholders</p>		
<p>E1</p>	<p>Stakeholder feedback</p> <p>The Panel appreciates that ARTICLE 19 makes an effort to actively gather, respond to, and learn from feedback.</p> <p>Both formal and informal feedback is encouraged, through a variety of mechanisms such as stakeholder meetings, focus groups, post-activity feedback forms, satisfaction surveys, and informal chats. ARTICLE 19 is continually working on adapting feedback tools to the contexts and needs of stakeholders, such as mechanisms that do not require literacy, are gender appropriate, low cost, and familiar.</p> <p>ARTICLE 19 analyses the feedback they receive and discusses with project stakeholders what changes they can make to address the issues raised. Lessons learned are also collected.</p> <p>The report provides some examples of changes ARTICLE 19 made in response to feedback received, including targeting different stakeholder groups, adapting trainings to different contexts, and using traditional folklore to provide trainings to remote rural communities.</p> <p>The approach seems strong and we note positively that ARTICLE 19 wants to further improve, to ensure feedback is gathered systematically for every project, and informs future work. We would also like to see some information on how ARTICLE 19 collects feedback on their work and direction in general - in addition to feedback on specific events.</p> <p>In the next report, we also request information on how ARTICLE 19 gathers feedback from internal stakeholders – staff and volunteers.</p>	<p>3</p>
<p>E2</p>	<p>Stakeholder engagement</p>	<p>2</p>



	<p>The report provides a detailed table outlining how key stakeholder groups are engaged in different thematic areas. ARTICLE 19's approaches range from awareness raising, legal support, training, and sharing of tools, to creating coalitions and collaborations and carrying out advocacy campaigns.</p> <p>This is a good starting point, but here we would like to know how exactly those stakeholders are engaged in the processes mentioned. For example, are certain stakeholders consulted in the development of advocacy campaigns, and do they also take part in implementing them? Are they involved in evaluating the campaigns, trainings, etc.? Are stakeholders involved in the creation and monitoring of ARTICLE 19's strategy? Can any examples be shared?</p> <p>One good example is shared under question E3, of how ARTICLE 19 supported young activists in Tunisia to implement projects developed by them.</p>	
E3	<p>Main likes/dislikes from stakeholders and organisation's response</p> <p>The main thing stakeholders like about working with ARTICLE 19 is their reputation in the field and the fact that they are a responsive and collaborative partner. An example of positive feedback from an activist in Tunisia who appreciated ARTICLE 19's support is also shared.</p> <p>In terms of dislikes, these tend to focus on ARTICLE 19's administrative, finance, and reporting requirements for those they work with. While ARTICLE 19 explains that donors require high levels of compliance and that these are for accountability purposes, partners still see the reporting as onerous, and some stakeholders have even considered cancelling projects due to the compliance required. The Panel notes positively that ARTICLE 19's approach is to support partners and help build their capacity in these cases, as this would help sustain local partners and help them grow too.</p>	4
E4	<p>People and partners have gained capacities that last beyond your immediate intervention</p> <p>The report explains that ARTICLE 19 carries out due diligence on implementing partners, identifies any gaps and needs for capacity building, and plans how to support partners in response. The response to question B1 includes more information on how ARTICLE 19 provides</p>	2



	<p>capacity building support to other stakeholders such as civil society in general and the media, with examples of training provided.</p> <p>The key indicators that demonstrate that people and partners have gained capacities are listed, including changes to organisational structure, policies and processes, and receiving feedback. On the latter point, ARTICLE 19 has begun asking stakeholders about capacity and skill strengthening at the end of projects, but the report states that this needs to be done more systematically. Again, some more information on this can be found under question B1.</p> <p>The response would be strengthened in future reports by providing examples, for example of some of the feedback received at the end of projects, and of changes in stakeholders as a result of capacity building, and the resulting impact on the organisation/its work.</p>	
<p>F. Our advocacy work addresses the root cause of problems</p>		
<p>F1</p>	<p>Evidence regarding the root causes of the problems you address</p> <p>The response talks about the importance of gathering evidence to better understand the core problems the organisation is trying to address, and to then identify possible solutions. It explains how ARTICLE 19 ensures advocacy issues are in alignment with strategic priorities, and shapes their work by discussing with internal and external stakeholders, including thematic experts.</p> <p>Evidence is collected via desk research, interviews with activists affected by the issue (which the Panel notes particularly positively), and surveys filled out by stakeholders (the Panel appreciates this too). Different teams use different tools such as problem tree analyses, but there isn't a universal tool used throughout the organisation.</p> <p>In the next report we would welcome some more details about the three key approaches to gathering evidence, as well as any examples showing how these fed into work on a particular advocacy issue, if possible. Are there any documents providing guidance on these points? What are the kinds of questions asked in the interviews and surveys – is it purely to understand the situation or does ARTICLE 19 also ask about potential advocacy responses that stakeholders would like to see?</p>	<p>2</p>
<p>F2</p>	<p>Stakeholders support your advocacy work and value changes achieved</p> <p>The Panel notes positively that ARTICLE 19 engages key stakeholders in the development of advocacy work. Strategies are designed in consultation</p>	<p>2</p>



	<p>with core stakeholder groups. Workshops are held where stakeholders share their thoughts, and undertake together an analysis of strengths, weaknesses, and risks when delivering the campaign. The stakeholders who attend the workshop then help develop the advocacy strategy and implementation work plan. This ensures that different cultural and political contexts are considered, and that there is buy-in from stakeholders.</p> <p>Are these stakeholders also involved in the implementation of the advocacy work? Can ARTICLE 19 share an example of an advocacy effort, explaining how the processes above worked – e.g. how did the strategy and work plan development play out; did ARTICLE 19 receive any positive feedback about its advocacy work on the issue?</p>	
<p>G. We are transparent, invite dialogue and protect stakeholders' safety</p>		
<p>G1</p>	<p>Availability of key policies and information on your website</p> <p>Information about ARTICLE 19's mission, strategy, governance and funding (including audited financial statements) is available and accessible on their website. There is also an accountability section on the website which explains ARTICLE 19's commitments as part of their membership of Accountable Now and IATI. The report also provides a link to their IATI data.</p> <p>The accountability page includes links to the safeguarding and whistleblowing policies. The report explains that while a feedback/complaints form has been developed, this has not yet been put online. There is a webpage for raising concerns or complaints, but this is not easy to locate. The link is in small font on the website's footer – we encourage ARTICLE 19 to include a separate button in the navigation bar of the website. More feedback on the complaints mechanism is provided under question J3.</p> <p>A link to the privacy policy is also in the website's footer – again, this could be made more prominent. In general, ARTICLE 19 might consider including a section on its website with links to all its policies.</p> <p>We encourage ARTICLE 19 – as we do all our members – to share online and in a very prominent way, further policy documents, such as annual budgets, the salary scale, the code of conduct, disciplinary and grievance procedure, and policies on sexual harassment, bullying and harassment, and on the environment.</p>	<p>2</p>
<p>G2</p>	<p>Pay scale, gender pay gap and top salaries</p>	<p>2</p>



	<p>ARTICLE 19 has salary scales in each office, and policies on salary increases over time, promotions, and acting up. It is stated that salaries are competitive for the country of operation. In the next report we would like to know more about how ARTICLE 19 ensures salaries are fair and equal – for example, are there policies or processes to ensure local hires and expats, or women and men in comparable positions have comparable salaries?</p> <p>ARTICLE 19 does not currently measure the gender pay gap. Are there any plans to do this in future? An analysis would help identify whether the current policies and processes do result in fair and equal pay.</p> <p>Given the fact that ARTICLE 19's salaries vary across the world, the top and bottom salary scales for the UK are given as an example.</p>	
G3	<p><i>Ensuring privacy rights and protecting personal data</i></p> <p>The report explains that ARTICLE 19 is fully GDPR compliant, and explains key points of its Data Protection Policy. Whilst not linked in the report, we found a link to the policy on the website's Privacy Policy page. Between them, the two policies explain relevant laws and good practice and how ARTICLE 19 is complying, how they are collecting, using, and protecting personal data, the rights of stakeholders and the responsibilities of ARTICLE 19, and more. We commend the thoroughness of the data protection policy particularly.</p> <p>The response also explains how ARTICLE 19 works strategically to promote regulations and standards for internet providers to protect the privacy of internet users.</p> <p>Overall, ARTICLE 19's approach seems strong on data privacy.</p>	3
G4	<p><i>Largest donors and their contributions</i></p> <p>The report lists ARTICLE 19's five largest donors for 2018 and the amount of their contributions. It explains that there are very few donations from individual donors, and that single contributions have to date not been more than 300 GBP. These individual donations are made via the website, and do not influence the activities of the organisations.</p>	4



Cluster C: Organisational Effectiveness		
H. Staff and volunteers are enabled to do their best		
H1	<p>Recruitment and employment is fair and transparent</p> <p>ARTICLE 19 strives to be an equal opportunity employer, and to ensure that no applicant or employee receives less favourable treatment due to their identity (several considerations such as race, colour, ethnicity, religion, sex, age, etc. are listed).</p> <p>Some examples of hiring principles are provided. These include advertising posts to bring them to the attention of disadvantaged or ethnic minority applicants, ensuring hiring criteria are strictly relevant to the job's requirements, and considering the necessity of a certain number of years of experience or specific qualifications (nothing this may disadvantage those of particular ages or cultures). ARTICLE 19 is also developing a recruitment policy which will strengthen safeguarding in recruitment. The Panel commends the described approach and looks forward to seeing the recruitment policy in a future report.</p> <p>In the next report, can ARTICLE 19 also provide an overview of its workforce broken down by location/office, contract type (full/part time), local/expat hires, gender, age, and responsibility level (for the latter, including gender and local/expat hires will provide further insight into the make-up at senior levels). An example to refer to is from Sightsavers' 2017 report (pp. 22-24), though we would also want to see the proportion of men and women in senior management positions.</p>	3
H2	<p>Staff development</p> <p>The Panel commends ARTICLE 19 on the progress made on staff development in the reporting period, with HR being allocated a centralised budget specifically for staff development. This includes training for staff on organisational skills, and special trainings for emerging managers and senior management.</p> <p>The performance management system has been developed to include personal and professional development for staff, with an evaluation of training undertaken and needs for the next year. The response to question G1 had mentioned that all staff are appraised annually – can ARTICLE 19 provide some more information on who is involved in these appraisals and how they are conducted? Is this an appraisal for all individual staff of Article19 or just for key staff? What is the method of appraisal, e.g. 360 degree or with direct line managers? Staff are also guided to develop their</p>	3



	<p>own personal development plans and to make sure of development opportunities within the organisation.</p> <p>In addition to the above opportunities, teams are also allocated budgets for staff development, with skills training linked to strategic outputs.</p> <p>The Panel appreciates ARTICLE 19's efforts to invest in staff development. The Panel would also like to suggest the benefits of online/eTraining systems with modules on specific skills that would permanently be available for staff, and with incentives for staff who make use of the system. Apart from reducing costs, this offers permanent capacity building opportunities for staff</p>	
H3	<p>Safe working environment</p> <p>The report lists the various policies in place to ensure a safe working environment, including a code of conduct, disciplinary and grievance procedure, harassment policies, safeguarding, and whistleblowing policy. Unfortunately, none of these were linked in the report and only the latter two are available online. Again, we urge ARTICLE 19 to make these other key policies publicly available.</p> <p>In terms of operationalising the policies, the report describes various efforts. Staff are given trainings on the policies, the HR team has been building capacity in regional offices and ensures policies suit the local context, and there are plans to introduce trained "confidential helpers" with whom staff can discuss incidents of harassment, abuse or exploitation.</p> <p>The Panel notes positively that confidential email addresses are being introduced for safeguarding and whistleblowing matters – we noted that the policies already refer to dedicated safeguarding@ and whistleblowing@ email addresses. Information about reporting will also be presented on posters in ARTICLE 19's offices globally.</p> <p>Finally, ARTICLE 19 is undertaking a culture review, involving staff representatives from across the globe. The review will identify aims to reach in terms of culture, and develop a plan for how to achieve these. It will also include a review of ARTICLE 19's values and behaviours. The Panel appreciates this initiative and looks forward to hearing more about it in the next full report.</p> <p>Given the critical nature of safe working environment for an organisation's survival and effectiveness, the Panel would like to flag again the benefits of setting up an online training system with modules on these policies. This</p>	3



	<p>would create a permanent opportunity for staff to be reminded of these policies.</p> <p>Overall, ARTICLE 19's approach is seen to be strong.</p>	
<p>I. Resources are handled effectively for the public good</p>		
11	<p><i>Resources are acquired in line with your values, globally accepted standards and without compromising independence</i></p> <p>ARTICLE 19 is currently developing an ethical fundraising policy, but already has several policies and processes in place to this end, which are described in the report. These relate to ensuring ARTICLE 19's independence, using donations effective to further the organisation's mission, complying with donor requirements, publishing details of major institutional gifts and disclosing donor identities, and systems to prevent, detect and report on financial misconduct.</p> <p>The response also states that ARTICLE 19 aims to pre-define fundraising opportunities by working closely with donors to influence their grant making goals.</p> <p>Overall, the approach seems sound, and we look forward to the completion and implementation of the ethical fundraising policy. Annex 1 of the report also refers to a new Fundraising and Partnership Strategy, and we would also like to see either a link or a summary of key points of this.</p>	3
12	<p><i>Monitoring of progress and re-allocation of resources</i></p> <p>ARTICLE 19 embeds monitoring, evaluation and learning (MEL) throughout its project management cycle, and the report explains how capacity building and support is provided, including through an MEL toolkit (could this be linked and shared in future reports?), an online resource page, and quarterly meetings with an MEL officer.</p> <p>Progress against projects and organisation strategy is tracked through a system which is implemented across the entire organisation, allowing for strategic review of progress at a senior level and reallocation of resources when necessary. How often are these reviews conducted, and who makes decisions about re-allocation? Is progress reported regularly to the Board?</p>	3
13	<p><i>Minimising risk of corruption, bribery and misuse of funds</i></p> <p>The Panel finds ARTICLE 19's efforts on this issue to be sound. An anti-corruption and -bribery policy is in place (a link is requested in the next</p>	3



	<p>report) and all staff received a training in 2018. It is stated that other relevant policies were being developed in 2019 without much details about the areas covered.</p> <p>A number of interesting key financial controls are outlined, including separation of duties, expenditure authorisation limits, a double-entry accounting system, and an annual audit with follow-up of control weaknesses.</p> <p>It is stated that if controls should fail, the situation is dealt with in accordance with the particular circumstances. Some more detail is requested in the next report; are (an overview of) incidents shared with senior management or the board? Are there certain positions in the organisation that would conduct an investigation?</p> <p>The report doesn't mention whether any incidents occurred in the reporting period – we request this in the next report.</p> <p>Finally, the report outlines ARTICLE 19's future plans, including introducing an organisation-wide procurement policy, improving implementation of existing policies around due diligence and sampling, and introducing a purchase order system.</p>	
<p>J. Governance processes maximise accountability</p>		
<p>J1</p>	<p>Governance structure and recruitment of trustees/board members</p> <p>A detailed overview of ARTICLE 19's governance structure is provided, explaining the roles of the General Assembly, International Board, Executive Director, Global Management Team, and the Board's Finance and General Purpose Committee.</p> <p>The report also explains how Trustees are recruited – how long are the terms for Trustees? There is reference to selection criteria mentioning if specific expertise or knowledge is required – is there a skills matrix for the Board? Are there any targets in terms of gender, age or geographical balance?</p>	<p>4</p>
<p>J2</p>	<p>Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes</p> <p>The response explains that as care, compliance and prudence are the main duties of ARTICLE 19's trustees, the board has ultimate responsibility for overseeing adherence to policies, efficient resource allocation, risk management, and complaints.</p>	<p>3</p>



	<p>The board's Finance and General Purposes Committee oversees risks and resource issues, reports to the board at least twice a year, and reviews the risk register multiple times a year.</p> <p>The board reviews and approves all organisational policies, and the grievance policy allows for appeals directly to the board – this is overseen by the trustee with the most HR expertise.</p> <p>The Panel finds ARTICLE 19's processes as described to be sound.</p>	
J3	<p>Complaints handling mechanisms and overview of complaints (external)</p> <p>The Panel appreciates that, based on our feedback, ARTICLE 19 has made its whistleblowing policy available on their website. We have provided feedback on this under question J4, which asks about complaints mechanisms for internal stakeholders.</p> <p>As for external stakeholders, there is a web page for raising concerns or complaints (though this is not explicitly mentioned in the report). It includes ARTICLE 19's complaints policy, which outlines the process and timeline for handling complaints – we note this positively, as this is the practice we encourage our members to adopt. Regarding complaints submission, it appears that this is currently only possible via the "contact us" form on the website. The report stated that ARTICLE 19 planned to upload a feedback form for complaints to the website, and we hope that this is updated soon so that stakeholders can make use of a dedicated submission channel. The policy did not refer to the possibility of submitting complaints via email, phone, or post.</p> <p>However, the complaints webpage is not easy to locate. The link is in small font on the website's footer – we encourage ARTICLE 19 to include a separate button in the navigation bar of the website. The report itself acknowledges that there is a need to make the complaints mechanism and policies more visible, and states that this is being planned as part of the website's development. However, this is expected to take some time, which is why ARTICLE 19 planned to upload a feedback form in the meantime. We urge ARTICLE 19 to prioritise this point, as it has been postponed for several years now.</p> <p>Also of relevance here is the safeguarding policy, which is comprehensive and includes information on the prevention of potential incidents, as well as on the process for reporting incidents. The Panel notes this positively, as well as the fact that there is a dedicated email address for submissions. When reading the policy, it was not entirely clear whether it is aimed at ARTICLE 19 staff and partners, or external stakeholders. Section 6 on</p>	2



	<p>reporting states that “ARTICLE 19 is committed to ensuring that safe, appropriate, accessible means of reporting safeguarding concerns are made available and actively promoted to staff and the communities we work with,” which the Panel appreciates, but further sections seem more geared towards staff. In the next report we would like to hear about the means of reporting available to the communities ARTICLE 19 works with.</p> <p>Finally, the report mentions that no external complaints were received during the reporting period. However, as mentioned in previous feedback letters, given the fact that information about complaints mechanisms is not very easy to locate on the website (and as there was no information about offline mechanisms provided in the report we are not able to assess those) it seems unlikely that external stakeholders would be able to easily submit any complaints and may not even be aware of the opportunity to do so.</p> <p>We look forward to an update in the next interim report, particularly about whether the complaints policy and submission mechanism(s) are easily locatable on the website. We would also like to hear about any offline mechanisms that are available to external stakeholders. The Secretariat can provide resources or support if needed.</p>	
J4	<p>Complaints handling mechanisms and overview of complaints (internal)</p> <p>The response to this question is very brief, mentioning the policies ARTICLE 19 has in place, and the number of complaints received. The relevant policies include a disciplinary and grievance procedure, sexual harassment policy, bullying and harassment policy, safeguarding policy and whistleblowing policy. As mentioned previously, the latter two are available online, but the others are not, and were not linked in the report. The Panel has requested links to these policies in previous feedback letters, and urges ARTICLE 19 to make them available, or at least to include a summary of key points in the report. Without this information it is not possible to assess whether the processes seem sound.</p> <p>The whistleblowing policy does appear to be sound, is available for both current and former staff as well as other affiliated persons to use in raising concerns, and outlines the procedure for submitting and reviewing complaints. There is a dedicated email address, which is good practice, and submissions may also be made via post or the website’s contact form.</p> <p>The report states that the International Office received 5 formal complaints in the reporting period, which were all deemed to be valid, were investigated, and resolved. We encourage ARTICLE 19 to provide an overview of the general categories of the complaints received as well as any learnings for the organisation or changes made to try to prevent future</p>	2



	<p>occurrences. Best practice in incident reporting currently is Oxfam, with detailed overviews of the number and type of incidents, type of complainant and accused/perpetrator, the number of cases resolved and broadly what action was taken (e.g. disciplinary action, dismissal).</p> <p>We would also like some more information on this issue, in line with our above comments, in the next interim report. The Secretariat is also happy to provide any support or guidance needed.</p>	
J5	<p>Protecting confidentiality and anonymity of those involved in complaints</p> <p>The report states that the sexual harassment and whistleblowing policies, and the grievance and disciplinary procedure outline how confidentiality is managed. As only the whistleblowing policy is available online, the Panel was only able to refer to that. In that case, it is stated that the identity of “the worker” will be kept confidential internally; however there does not appear to be any guidance on confidentiality for the accused in the policy. The report does state that all complaints will be investigated with the utmost confidentiality and that information is shared on a need to know basis only.</p> <p>Both the whistleblowing and safeguarding policies state that anonymous reporting is possible, and the Panel notes positively that there is also a confidential, independent third party whistleblowing hotline which can be reached by phone or email (as stated in the whistleblowing policy).</p>	3
<p>K. Leadership is dedicated to fulfilling the 12 Commitments</p>		
K1	<p>The governing body and management are held accountable for fulfilling strategic promises</p> <p>The report explains that the board and the senior management team (SMT) monitor the progress of the global strategic outcomes (including one on accountability) regularly, including any challenges, and provide support to relevant teams if needed. The governance structure aims to ensure effectiveness, and has led to better communication and collaboration across ARTICLE 19.</p> <p>In terms of performance assessment, the board reviews strategic progress annually and provides feedback to senior management. Is there specifically an appraisal of the Executive Director or is his appraisal part of the annual general staff appraisal? It is also stated that the board periodically commissions an external review of their governance. The Panel notes this positively, and would like to know how often, on average, this occurs, what have been recent important findings and how the</p>	2



	<p>findings are used. E.g. are governance processes revised, or the composition of the board reviewed?</p> <p>In future reports we would welcome examples of any key findings/outcomes from the review processes of the SMT or board, and any changes made or decisions taken in response.</p>	
K2	<p><i>Inclusion of staff in discussing progress toward organisational accountability</i></p> <p>The response explains that ARTICLE 19 staff are aware of the organisation's commitment to accountability and that they actively contribute to the 12 commitments – some more information on what the latter point looks like would be welcome.</p> <p>The Panel appreciates that ARTICLE 19 sees accountability as more than a retrospective assurance mechanism, and rather as a guide for what they want to achieve and how they work. We also understand that not all staff are aware of the 12 Commitments or the reasoning behind regular reporting and assessment on the organisation's accountability. The report states that there is a need to start more comprehensive discussions with staff on the benefits of organisational accountability, and the Panel supports this sentiment. We would also add that Accountable Now sees the reporting mechanism as more than a compliance tool – it is an opportunity to reflect dynamically on, better understand, and strengthen all manner of organisational practices, and to have organisation-wide discussions around accountability. The Secretariat is able to provide more information or resources on this, or even organise a workshop or similar support for ARTICLE 19 staff if this would be helpful.</p> <p>In the next report we would also like to understand how the accountability report is compiled, and which/how staff members contribute. Is the completed accountability report and/or the Panel's feedback shared and discussed with staff?</p>	2
K3	<p><i>Scope of this accountability report and influence over national entities</i></p> <p>The report covers the entire organisation, including regional offices. The response states that there is consensus across the organisation on the need to be accountable and to demonstrate accountability internally and externally. The 12 Commitments are embedded in strategy, policies, and processes, and while regional offices do not report periodically on the commitments, regional directors provide relevant information for the</p>	3



	accountability reports. Some sections of the report, such as environment and finance, focus more on the international office.	
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