



**Accountable
Now**

GLOBAL STANDARDS LOCAL TRUST



Accountability Lab Independent Review Panel Feedback

Accountability Report 2019
Review Round January 2021

Accountable Now · www.accountablenow.org ·

Secretariat: % MACHWERK in der Alten Münze, Am Krögel 2, 10179 Berlin, Germany

International NGO Charter of Accountability Ltd · German Registration Number: HRB 212396 B · VAT ID: 27/640/02763



Accountability Lab Feedback from the Independent Review Panel

Review Round January 2021

12 February 2021

Dear Blair Glencorse,

Thank you for submitting your accountability report. We, the Independent Review Panel of Accountable Now, appreciate your 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.

The first accountability report of Accountability Lab demonstrates a strong commitment to dynamic accountability and an emphasis on transparency and learning throughout the report. The inclusion of Future Actions in each section is a very **good practice**, although many of these statements are not specific enough to show how their intention is to be achieved. As the Panel notes, there are a few questions in the framework that AL does not seem to have understood. As this is AL's first report, this is understandable.

The panel has identified the following strengths: the summary of lessons learnt and actions upon them (B2), ensuring privacy rights and protecting personal data (G3), Minimising risk of corruption, bribery and misuse of funds (I3), and the focus on learning and gathering feedback (E3), which is considered a **good practice**.

Specific areas for improvement are also flagged in the report: Minimising negative impacts on stakeholders (C4), Reaching out to those impacted or concerned by your work (D2), Complaints handling mechanisms and overview of complaints, external (J3) and internal (J4).

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

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





Accountability Lab's Accountability Report 2019

Review Round January 2021

Opening Statement from the Head of Organisation

The opening statement by Accountability Lab CEO, Blair Glencorse, is very comprehensive, giving background on Accountability Lab's history, and on the main objectives for the organisation. The rationale for becoming a member of Accountable Now is explained as " a way to measure, share and improve our own accountability".

The process undergone to produce the report is outlined. A strong commitment to Accountability and learning is demonstrated and emphasised through the opening statement.

AL is showing from the start a very strong commitment to the Global Standard operationalising it across the AL network, with the Executive Director and each network member reviewing their fulfilment of the standard in a 2 hour call. The decision to embed the commitments into the working practice of each AL member is exemplary.

Cluster A: Impact Achieved

A. The impact we achieve

A1	Mission statement and theory of change The mission and theory of change (ToC) of the organization are explained. Accountability Lab sees a theory of change as a way to understand the causality between inputs, outputs and outcomes. It is also highlighted that AL has developed several iterations of its ToC and is testing different ToCs in different contexts. It is acknowledged that the current ToC, developed in	4
----	--	----------



	<p>2019, is very likely to change in the future as the organisation keeps learning. At this stage the ToC is still very high level. It is more of an approach than a TOC, which should be tied more closely to the goals and objectives of the AL strategy. It would be good for the next report to include the goals and to present the specific causal pathways by which the goals are to be/ are being achieved.</p>	
A2	<p>Key strategic indicators for success</p> <p>The three primary objectives of AL as a network are listed, and three indicators at programmatic level are outlined. A link to the 2020-2023 Strategy is provided, which provides more details on measurement processes and indicators. Learning itself is considered as a core key performance indicator. That indicators are intangible and difficult to quantify in this kind of work is understood. This could usefully be a topic of discussion in the planned partnerships with academic institutions. The AL Strategy includes a preliminary results framework with some indicators and means of verification against the strategies three goals. Targets are presented but no baseline, so in effect the first survey will become the baseline.</p> <p>The response acknowledges the challenges on documenting stakeholder involvement in programmes and their contribution to strategic objectives. Some examples are provided on how some teams within AL have captured stakeholders involved. The panel would like to see in the next report how AL keeps up to date with developments and with trends in Accountability.</p>	2
A3	<p>Progress and challenges over the reporting period</p> <p>The response recognises the need to build MEL capacity in order to consistently measure impact. It also acknowledges the impact AL is trying to achieve relates mostly to behavioural shifts, an area where the contribution versus attribution challenge is great. The report states the intention to measure results rather than summarising the results achieved. The panel understands that the measurement systems are emerging and expects to see more results in the next report.</p>	2



	AL has partnered with experts on social norms in anti-corruption efforts to enhance understanding of the changes AL seeks to measure, and to build an implementable MEL framework around norm shifts specifically. It would be helpful to include in the next report what has been learned from the work with Tufts on measurement of progress.	
A4	<p>Significant events or changes regarding governance and accountability</p> <p>The response highlights the recent evolution in the fields of accountability and transparency from the surge of new movements and tools at global level, towards increasing threats to open societies in the context of the rise of nationalist politics. A description of the external contexts for the AL country offices is also provided. The changes to the global and local external contexts are well described and how AL might adapt to those. However, this question is also asking for an overview of changes relevant to accountability within the organisation, for example, in governance, leadership, strategy, policies (e.g. introduction of a new complaints or stakeholder engagement policy) or programmes and operations (e.g. focusing on a new stakeholder group, implementing new accountability processes).</p> <p>The panel would like to know the rationale behind focusing on corruption in governments. Would the Accountability Lab address corruption in corporations?</p>	3
B. Positive results are sustained		
B1	<p>Sustainability of your work</p> <p>It is stated that AL programs are self-reinforcing and sustainable as developing key skills of program participants is central for all interventions. Some examples with supporting documentation online are provided to illustrate AL approach to sustainability of their programmes.</p> <p>The future actions for this section are somewhat vague. For example, 'continue to prioritise sustainability' reads as an aspiration without the actions required to achieve it. 'Continue to think' is not an action.</p>	2
B2	Lessons learned in the reporting period	4



	<p>An excellent summary of overarching lessons is presented in the context of the new strategy, with an accompanying set of actions built on the lessons learned.</p> <p>AL is working on documenting and sharing lessons. Currently learnings are shared internally through meetings. Some teams use quarterly reviews for more thorough conversations around progress.</p> <p>The approach to lessons learnt is flagged as a strength by the panel.</p>	
C. We lead by example		
C1	<p><i>Excellence on strategic priorities</i></p> <p>AL sees excellence closely tied with legitimacy, which is shaped by three core elements: downwards accountability, transparency and political independence. It is briefly explained how AL pursues these elements. The report states that 'strategic priorities are at the core of everything we do' but gives no evidence of how that is achieved. A discussion of legitimacy, transparency and positivity misses the point here. Also the future actions proposed do not relate to showing excellence in strategic priorities. ARTICLE 19's 2018 (pp. 10-11) report can serve an example on how to address this question.</p>	2
C2	<p><i>Expertise is recognised and welcomed by peers and stakeholders</i></p> <p>AL's efforts on building coalitions and communities around accountability are mentioned to be globally recognised as AL has been invited to share thoughts through the Open Government Partnership and at the World Economic Forum.</p> <p>Links to media coverage, learning opportunities and accolades are provided as evidence of AL being seen as an innovative and influential partner. Also links to high level events where AL has been invited to speak are provided. Some examples where AL is recognised at local levels are provided.</p>	3
C3	<p><i>Inclusivity, human rights, women's rights and gender equality</i></p> <p>A link to a website section with Information about AL's goals in terms of gender equity is provided. It is mentioned that AL recruitment ensures</p>	3



	<p>“racial, gender and ethnic diversity across all levels of programming and management”. A link to a dedicated site containing relevant AL policies is provided.</p> <p>On partnerships, AL prioritises working with organisations that work with people from minority groups. Some examples from local offices are provided to illustrate this approach.</p> <p>An example from AL Liberia mentions program participants with disabilities being supported.</p> <p>All staff and members are required to participate in safeguarding training within 3 months of training, which is a good practice.</p> <p>For the next report, the panel suggests to provide examples of added value for partners on inclusivity, human rights, and accountability.</p>	
C4	<p>Minimising negative impacts on stakeholders</p> <p>A set of policies are available online, which aim to minimise the negative impact on stakeholders. These policies are said to be communicated and cascaded by leadership, and that they apply to all staff. Some examples showing local offices' initiatives, including risks mitigation. The report makes no mention of sexual exploitation and abuse, a real and high profile risk. The Panel suggests that AL addresses this in the next report. The Panel will also be interested to hear of progress in setting up a whistleblower process in the next report.</p>	2
C5	<p>Responsible stewardship for the environment</p> <p>The response outlines several initiatives aiming at minimizing the organisation's environmental impact; air travel reduction, use of recycled materials, separation of waste for recycling, etc. It is also mentioned the use of Atmosfair or MyClimate systems to compensate for air travel emissions.</p> <p>Several local activities by AL Nepal are mentioned, including the production of compost and trees plantation in the office premises.</p>	3



	The actions taken so far are positive. AL could usefully develop a policy statement on environmental stewardship to promote consistent application, if it does not have one already.	
Cluster B: Stakeholder Involvement		
D. Key stakeholders are identified with great care		
D1	<p>Key stakeholders and how they are identified</p> <p>AL divides its stakeholders in four groups: civil society, government, business and others (so called 'unlikely actors'). Each group is described with examples and the purpose of AL's engagement.</p> <p>AL identifies stakeholders by focusing on what partners might have similar values as it pertains to the relevant intended outcome of the partnership. The relation is guided by the partnership policy.</p> <p>The next report could helpfully explain why the unlikely partners are unlikely, as they seem natural potential collaborators for an innovation and learning network such as AL.</p>	3
D2	<p>Reaching out to those impacted or concerned by your work</p> <p>The response focuses on describing AL's approach to learning. This would have fitted better under question B2.</p> <p>Regarding reaching out to stakeholders, the response outlines some data gathering exercises in the context of learning and how the feedback from stakeholders helps AL to understand the progress towards the goals set out in the strategy.</p> <p>The response here discusses various review, learning and convening processes, which are an interesting insight into how AL works but do not answer question D2. The proposed actions are also not pertinent.</p> <p>The question is how AL ensures that those engaged in its work are the most relevant, indirectly a question about focusing resources on those for whom they are intended. This is harder for AL to answer than a typical development organisation but the Panel hopes AL can get nearer to a more relevant answer in the next report.</p>	2



	<p>Although the panel acknowledges the different nature of work, it suggests Sightsavers' report (pp. 16) as an example on how to approach this question.</p>	
D3	<p>Maximising coordination with others operating in the same space</p> <p>AL sees coordination with other actors as “two separate but complementary activities”. Through <i>Coalition Building</i> AL channels upwards ideas to ultimately shift power. Through <i>Convening</i> AL brings together the right people to develop solutions. Various examples to illustrate the coordination approach through both activities are given. The panel commends Accountability Lab for this approach, and flag it as a strength.</p> <p>As with other sections, the Future Actions in the next report could be made more specific. For example, ‘getting more intentional around convening’ requires what actions to be taken?</p>	4
E. We listen to, involve and empower stakeholders		
E1	<p>Stakeholder feedback</p> <p>The response states that real-time feedback data is gathered through regular meetings, other events and workshops, and through verbal interactions and feedback forms in some countries.</p> <p>Detailed examples on how feedback was captured for the 2020 - 2023 strategy development and how AL Nigeria collects feedback, are provided. The report provides one example of a change made in response to stakeholder feedback. The next report could helpfully include more examples. Also, the panel would like to know whether AL has engaged with other Accountability networks and initiatives?</p>	3
E2	<p>Stakeholder engagement</p> <p>The criteria for AL to “enter a new space” is thoroughly explained, consisting in demand, strategy, knowledge partnerships, cost-effectiveness and sustainability. Once these criteria are assessed and AL moves in the new space, stakeholders are involved at the different phases of programmes’ life cycle. Some more practical examples would help to</p>	3



	demonstrate how AL stakeholder engagement works in practice. The Future Actions are clearly set out and point to AL's aspiration to close gaps in the consultation process that are not explained earlier. The next report could explain whether these actions have led to the intended improvements in stakeholder consultation.	
E3	<p>Main likes/dislikes from stakeholders and organisation's response</p> <p>The results from a perception study that AL commissioned are shared. Some positive elements are highlighted: the focus on learning, AL's fresh innovative approach, and its flexibility and agility.</p> <p>On feedback for improvement received, the response lists and provides details on three areas: Network building, communications, and consistency. A detailed overview on actions for each of the areas is also provided. AL is also very open about the negative coverage the flagship campaign Integrity Icon got in some regions.</p> <p>The panel commends AL for the analytical, open and candid approach to negative feedback. The focus on learning and gathering feedback is considered a good practice. AL's decision to use the AN reporting process as the basis for annual reflection and course correction is a bold move that should enable a thorough view of accountability across the network.</p>	3
E4	<p>People and partners have gained capacities that last beyond your immediate intervention</p> <p>The response explains with examples how gained capacities in three levels are retained: These are knowledge, networks and values. The report discusses how partners are continuing to use and build on their knowledge by taking initiative.</p> <p>What is AL's added value for the partners in terms of capacities? The panel would appreciate examples of that in the next report.</p>	3
F. Our advocacy work addresses the root cause of problems		
F1	Evidence regarding the root causes of the problems you address	3



	AL's work is informed by desk research on publicly available documentation, studies and surveys done by AL staff, lessons learnt from previous projects, and consultation with partners and citizens. Additionally some offices conduct discussions with communities to gather evidence, or work with academics to deepen understanding. The next report could usefully include practical examples to illustrate understanding of root causes and how this has been applied to advocacy.	
F2	<p>Stakeholders support your advocacy work and value changes achieved</p> <p>A stakeholder engagement process is outlined, from identification to closing the feedback loop. Some examples are provided to show stakeholders appreciation and support of AL's advocacy work. The future actions do not explain what action will be taken. What actions are involved in 'ongoing support' and 'continued efforts'?</p>	2
<p>G. We are transparent, invite dialogue and protect stakeholders' safety</p>		
G1	<p>Availability of key policies and information on your website</p> <p>It is mentioned that at global level "all our reports, annual budgets and audits are put online" however links to these were not provided. Not all Network labs have this information publicly available yet, however information can be accessed upon requests.</p> <p>Two third party platforms, IATI and Guidestar, are linked in the report, where AL information is published.</p>	3
G2	<p>Pay scale, gender pay gap and top salaries</p> <p>It is stated that AL is working to ensure gender parity and equity and some initiatives are mentioned such as equal parental leave for all. The job titles and descriptions policy briefly describes staff levels but salary ranges are not indicated.</p> <p>Ratio between top bottom salaries is only provided for AL South Africa (1:4.5), and top salaries are not provided. Building on the future actions as stated, the Panel proposes that AL include the results of top-bottom pay-ratios and gender pay gap in its future AN reports.</p>	2



G3	<p>Ensuring privacy rights and protecting personal data</p> <p>It is acknowledged that AL staff gather sensitive information and therefore, secure storage of information is key. Staff collecting data from vulnerable groups adhere to AL's Safeguarding Policy.</p> <p>In programs that participants gather data themselves, training is provided and potential data breaches are mitigated using third party data management tools.</p> <p>The response also briefly describes how staff data is treated internally. AL could usefully confirm whether it complies with GDPR or equivalent (or is working towards compliance with similar standards) and any challenges faced in doing so.</p>	4
G4	<p>Largest donors and their contributions</p> <p>Largest donors and their contributions are listed for each Lab. It is also mentioned AL Global gives small grants to country teams.</p> <p>The panel suggests for the next report to explain whether country offices acquire external funding directly?</p>	3
<h2 style="background-color: #008080; color: white; padding: 10px;">Cluster C: Organisational Effectiveness</h2>		
<h3 style="background-color: #00BFC4; color: white; padding: 5px;">H. Staff and volunteers are enabled to do their best</h3>		
H1	<p>Recruitment and employment is fair and transparent</p> <p>Currently hiring processes differ across AL, some teams adopt open, competitive processes, whereas in some cases recruitment is done internally or through headhunting. It is stated that AL is “moving globally to standardized processes that are open and transparent”. An example of how the processes are run in practice is provided for each of the two systems mentioned above. No Future Actions are stated, which looks like an important gap given that AL needs to make progress in this area.</p>	2
H2	<p>Staff development</p> <p>AL invests in staff development through different initiatives: (1) providing access to networks, conferences, and events, (2) supporting staff to pursue study and training, and (3) creating spaces for Country Directors to learn</p>	3



	<p>from one another. AL Liberia has included areas for development in their staff KPIs. Some other local initiatives are mentioned and also the intention to develop inter-lab exchanges. The panel would like to know how accountability "values" are invested and developed in staff.</p>	
H3	<p>Safe working environment</p> <p>A global policy on harassment is mentioned and it is available on the dedicated site. It is mentioned that some Labs have "outlined policies in their code of conduct". It is acknowledged that developments in communicating policies and in mechanisms for handling complaints are diverse across AL. Some examples from different Labs are shared to illustrate this diversity.</p> <p>It is increasingly common for CSOs to have a policy on the prevention of sexual exploitation and abuse. Given recent scandals and the ongoing risk of PSEA, the Panel suggests that AL considers adding such a policy with accompanying training. The AN Secretariat is available to connect AL with other member organisations on this topic.</p>	2
I. Resources are handled effectively for the public good		
I1	<p>Resources are acquired in line with your values, globally accepted standards and without compromising independence</p> <p>The response acknowledges the need for a global policy and process setting clear guidance to acquire resources. It is stated that currently the Labs uses caution to ensure values and independence are not compromised. Examples of some Labs refusing funding for different reasons are provided. AL could usefully explain how it prevents a donor having too much influence over a programme when its resources are dominant, for example Luminate in South African and MacArthur in Nigeria.</p>	3
I2	<p>Monitoring of progress and re-allocation of resources</p> <p>To measure progress against strategic objectives, AL performs regular analysis of its strategy and its outcomes. There is a three year operation plans and its associated indicators are reassessed on a quarterly basis. The</p>	3



	Panel suggests that AL adds a summary of performance against the most important KPIs in its next report.	
I3	<p>Minimising risk of corruption, bribery and misuse of funds</p> <p>There are different procedures across the labs to minimise risk, which are listed. It is stated that in 2019 there weren't significant issues and a case in AL Nigeria and follow up actions are outlined.</p> <p>Also some initiatives to minimise the risk at local levels are shared.</p> <p>The Panel commends AL's transparent explanation of cases of corruption.</p>	3
J. Governance processes maximise accountability		
J1	<p>Governance structure and recruitment of trustees/board members</p> <p>Each Lab has a Board of Directors although in some countries that is not legally required. The process for recruitment of new AL Global board members, which emphasises diversity, is explained. AL Global board members serve a 2 year term, renewable twice. It is also acknowledged the challenges some Labs have to ensure Boards engagement and formation. What is the relationship between local and global governance?</p>	3
J2	<p>Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes</p> <p>It is stated that the AL Global board has been very involved with the AL policies and Network Labs' boards are mostly involved in program interventions, financial sustainability, and learning. The planned future actions seem to be relevant to closing the governance gaps identified. The Panel looks forward to an update on the results in the next AL report.</p>	3
J3	<p>Complaints handling mechanisms and overview of complaints (external)</p> <p>The whistleblower policy, publicly available on the website, indicates that all complaints should be directed to the Executive Director or to the chair of the Board and both email addresses are provided. The policy scope is all Accountability Lab employees and therefore not suitable for external</p>	2



	<p>complaints. Does Accountability Lab have any other policy that is suitable for complaints that are not from staff or volunteers?</p> <p>It is stated that in the last year (2018?) two complaints were received against staff members, and how the cases were treated is explained.</p> <p>At Network level, AL Nepal has a programme committee to address complaints.</p>	
J4	<p>Complaints handling mechanisms and overview of complaints (internal)</p> <p>A global grievance policy is mentioned to guide staff members to report to either their direct superiors, senior management or a member of the AL Global team. It is acknowledged this mechanism has not been used often. It might be helpful to look at CIVICUS' Impact and Accountability framework (pp. 4-5) , which outlines their approach to internal feedback and complaints.</p>	1
J5	<p>Protecting confidentiality and anonymity of those involved in complaints</p> <p>It is recognised that AL does not have currently an anonymised complaints mechanism, however the whistleblower mentioned above does mandate discretion and assurance of anonymity if requested.</p>	2
K. Leadership is dedicated to fulfilling the 12 Commitments		
K1	<p>The governing body and management are held accountable for fulfilling strategic promises</p> <p>The response mentions the collective decision done by AL to join Accountable Now and adhere to its 12 accountability commitments. Also the process to produce the report is outlined.</p> <p>A board self-assessment is undertaken on an annual basis, which informs the priorities for the board in the coming year. It is recognised that the process is “not yet universally adopted across the Lab” but it is planned to be so.</p>	3
K2	<p>Inclusion of staff in discussing progress toward organisational accountability</p> <p>Country Directors sign a collaboration agreement, where their Labs' commitments to accountability are included.</p>	2



K3	Scope of this accountability report and influence over national entities The report covers the entire organisation, and the reporting process is written into the AL Collaboration Agreement with Network Labs.	3
----	---	----------