MIO-ECSDE
Independent Review Panel Feedback
Accountability Report 2018-20
Review Round June 2021
Dear Prof. Michael Scoullos,

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 interim report is clear, precise, informative and addresses the questions raised by the panel. Additionally, the report also provides a comprehensive overview on how MIO-ECSDE reacted and adapted to the COVID-19 pandemic.

The panel has noted the following specific strengths in the report: active engagement of stakeholders aiming to sustainability of outcomes (B1), Responsible stewardship for the environment (C5), provision of expertise and support to stakeholders (D2), and inclusion of staff in discussing progress toward organisational accountability (K2).

The panel notes positively the several recently adopted policies and looks forward to seeing evidence in future reports on how they produce the intended outcomes. The panel has identified the following specific areas for improvement: Minimising negative impacts on stakeholders (C4), identification of stakeholders (D1) and Complaints handling mechanisms and overview of complaints (J3 and J4).

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
Opening Statement from the Head of Organisation

The opening statement by Prof. Michael Scoullos, Chairman of MIO-ECSDE emphasises the commitment to Accountability, to improve practice, and to learning through the Accountable Now reporting process. The statement appreciates the feedback provided by the panel on the previous report, and lists several procedures and policies that were reviewed and further developed since then. It also highlights the efforts to enhance cooperation between the Secretariat and its members.

Material changes since the last report

Two changes are explained: (1) MIO-ECSDE membership has increased by 6 members since 2018. At the Annual General Assembly (AGA), and (2) the Croatian seat of the Executive Bureau (EB) became active and is part of the total 19 seats. It is also mentioned that MIO-ECSDE has received the EU Life Programme’s grant for two biennials in a row.

A comprehensive overview on how MIO-ECSDE reacted and adapted to the COVID-19 pandemic crisis, is provided.

Cluster A: Impact Achieved

A. The impact we achieve

A2 Key strategic indicators for success

The response recognises that a more comprehensive approach to measuring impact and linking it with objectives is not yet established. Two
Examples of programmatic activities are provided to illustrate the challenge of establishing such an approach.

Performance and impact indicators used by MIO-ECSDE at activity level are shared. Also, main results and deliverables and medium and long term outcomes expected within the EU LIFE Programme are provided. In E1, an infographic depicting some KPIs is provided.

B. Positive results are sustained

**B1  Sustainability of your work**

The response addresses how MIO-ECSDE ensures it can keep operating self-sustained. Risks and challenges are mapped and managed (details are shared [here](#)). An [Operational Environment](#) Analysis is also shared.

Stakeholder engagement is highlighted as part of the strategies, plans and projects cycles, and an example illustrating this engagement is linked ([here](#)) in the report. The response also addresses the sustainability of MIO-ECSDE work by sharing resources developed to support stakeholders, those are several publications and trainings.

The panel notes positively the active engagement of stakeholders as a key element of strategies and programmes development, and flags it as a strength in the report.

**B2  Lessons learned in the reporting period**

The response shares some main challenges including assessing impact and engaging members. To address the latter, it is mentioned a different approach will be applied. Also the adaptation of a training programme to the pandemic context is described along with testimonials from participants, and feedback for improvement.

A [report](#) which captures achievements in 2020 is shared, along with some appreciative testimonials from members organisations.

The panel appreciates the information provided here on the challenges and successes, and suggests for future report to further elaborate on the
reactions as a result of challenges and success experienced ie. what will MIO-ECSDE do differently in the next iteration of the project/activity/yearly process?

C. We lead by example

C3  **Inclusivity, human rights, women’s rights and gender equality**

Labeled C2 in the report. A [Gender Policy](#) is shared, which outlines commitments to “gender equality and women’s empowerment”. It is stated that Human Rights are intrinsically linked to MIO-ECSDE’s values, and addressed in the Statutes, [Code of Conduct](#), and other key documents including the new complaints and whistleblower policies. The ‘green recovery’ employment opportunities are seen as an opportunity for youth inclusion and empowerment.

A couple of initiatives, one led by MIO-ECSDE, the 2020 MAD, and the second, WES in which MIO-ECSDE is an active participant, are described. The initiatives promoted gender equality and youth inclusion within the context of environmental protection. The response also addresses inclusion of people with disabilities, and although a lack of a systemic approach is acknowledged, examples of some initiatives are provided.

The panel would like to invite MIO-ECSDE to reflect on the migration crisis in the Mediterranean and on what role the membership can play in addressing the environmental and sustainability concerns from a human rights based perspective, taking into account the human rights of migrants and refugees.

C4  **Minimising negative impacts on stakeholders**

Labeled C3 in the report. The response recognises the need for a more comprehensive approach at assessing and mitigating potential negative impacts on stakeholders. MIO-ECSDE deliberately maintains a low profile communication strategy in order to avoid overshadowing members, particularly in Greece, and uses English as its working language to that aim. In order to avoid competition for limited resources, MIO-ECSDE acts...
as a platform for cooperation among stakeholders, and provides institutional know-how and memory.

The panel suggests that in future reports, other stakeholders beyond members are considered including populations that MIO-ECSDE’s members work for and with and partner organisations.

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<th>C5</th>
<th><strong>Responsible stewardship for the environment</strong></th>
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<td>Labeled C4 in the report. MIO-ECSDE co-delivered with Accountable Now a <a href="#">webinar</a> which covered key points on developing an environmental policy for CSOs, and also provided some insights on how to identify and improve practices to ultimately reduce environmental footprints.</td>
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<td>MIO-ECSDE has a CO2 offsetting scheme for flights taken by staff and participants of events organised by MIO-ECSDE, saving 22 tonnes (<a href="#">verification</a>).</td>
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<td>The panel commends MIO-ECSDE for a strong approach to minimising environmental footprint of its operations and for providing leadership to other organisations in the sector.</td>
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### Cluster B: Stakeholder Involvement

D. Key stakeholders are identified with great care

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<th>D1</th>
<th><strong>Key stakeholders and how they are identified</strong></th>
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<td>In B1, stakeholder engagement is highlighted as a crucial part of design, implementation, and M&amp;E of strategies and projects. The response implies that there are two clearly differentiated groups of stakeholders: local CSOs (members or not), and citizens and communities within the Mediterranean region.</td>
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<td>A list of key steps in achieving a high level of engagement and relevance for MIO-ECSDE’s members is provided. It is explained that although citizens and communities are reached by members, MIO-ECSDE also</td>
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directly works with them within certain activities. An example is provided to illustrate how these activities look like and how stakeholders are engaged.

The panel appreciates the level of information provided on engagement with stakeholders and suggests that in the next report key stakeholders are listed and that the identification of stakeholders is further explained: How citizens and communities that MIO-ECSDE’s members work for and with are identified (particularly if MIO-ECSDE has a systematic approach that is promoted within membership)?

**D2 Reaching out to those impacted or concerned by your work**

The **findings** of a membership survey launched in 2018 are shared. The initiative sought to better understand members’ capacities, challenges and potential support needed. The proposed work programme is shared each year with the members to seek feedback.

It is stated that MIO-ECSDE provides expertise and support, and submits joint projects with members (a link to one of these is provided). Examples of feedback sought at project and activity levels are provided. The panel commends MIO-ECSDE for the close collaboration with its members. It is acknowledged that language is a barrier in the region. MIO-ECSDE has in-house capacity to deliver most of its resources in English and French, and many of them in Arabic and Greek.

The panel suggests that in future reports, other stakeholders beyond members are considered.

**E. We listen to, involve and empower stakeholders**

**E1 Stakeholder feedback**

The participation rates and findings of a survey distributed to members are provided. It is acknowledged that in spite of trying different approaches, response rates to surveys have been particularly low in the pandemic. Beyond surveys, MIO-ECSDE is using one to one informal discussions, monitoring mechanisms, project closing letters and project steering
committee meetings minutes to gather feedback from partners and donors.

**E2 Stakeholder engagement**

Covered in D2 and E1.

**E3 Main likes/dislikes from stakeholders and organisation’s response**

In E1, it is shared findings from the survey distributed to members in early 2020. Positive feedback included a good membership representation in regional political platforms, capacity building activities, and maintaining a fluid communication.

Feedback for improvement included the need for “more systematic information on proposed follow up actions after major regional Mediterranean meetings” and “more effort for regional projects”.

It is mentioned that efforts were already made to address the feedback and relevant internal procedures will be in place.

The Panel appreciates the endeavour to formally collect and take into account stakeholders’ feedback.

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

**G1 Availability of key policies and information on your website**

A dedicated webpage hosts the following policies: Anti-Corruption Policy, Environmental Policy, Code of Conduct, Gender Policy, Whistleblower Policy, Complaint Policy, and Privacy Policy. A brief description is provided for the recently adopted policies. On the same webpage, the annual reports and financial statements are published.

The Panel invites reflection in future reports, on whether translation of key policy documents might increase reach. Also, is the organisation considering joining IATI for example to promote transparency through publishing data?
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<th>G2</th>
<th><strong>Pay scale, gender pay gap and top salaries</strong></th>
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| The [Gender Policy](#) includes specific commitment to employment practices that promote gender equality, and preventing discrimination. The response provides an helpful infographic that outlines the salary ranges across four categories, within an overall range of 20,000 - 110,000 Euros. Percentage of female members of the Executive Bureau is shared.  
It is stated that there is no gender pay gap, however no description on how it is measured is provided. The Panel would like to know how this conclusion has been reached. |

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<th>G4</th>
<th><strong>Largest donors and their contributions</strong></th>
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<td>The five major donors of MIO-ECSDE projects for 2019 as well as the five major donors for projects implemented by MIO-ECSDE hosted entity Global Water Partnership-Mediterranean are depicted along their contributions in a chart.</td>
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### Cluster C: Organisational Effectiveness

#### H. Staff and volunteers are enabled to do their best

#### H2 **Staff development**

Staff inputs and feedback is sought through staff meetings. Annual evaluations provide an avenue to provide suggestions from both sides. 17 staff training sessions were planned and implemented in 2019 covering a wide range of themes, including GDPR and storytelling.  
It is interesting to note that training sessions included topics related to accountability, inclusion and communication skills.  
A 2-day staff retreat had to be postponed due to the pandemic.

#### J. Governance processes maximise accountability
### J3 and J4: Complaints handling mechanisms and overview of complaints (internal and external)

The recently developed Complaints and Whistleblowing policies are available online, and they outline the scope and process for external and internal complaints respectively. There have been no complaints raised during the reporting period.

It is mentioned that in the coming reporting periods, it is expected that eventual complaints will be facilitated by the new policies in place.

Beyond the policies being uploaded to the website, are there any plans to provide clear and visible ‘how to’ guides, and to train staff on the use of these specific policies and complaint mechanisms? The 12 steps to a great online feedback and complaints mechanism blog might provide some guidance.

### K. Leadership is dedicated to fulfilling the 12 Commitments

#### K1: The governing body and management are held accountable for fulfilling strategic promises

The response addresses the feedback raised by the panel previously, on assessing performance of the Chairperson and the Executive Bureau. It is stated that their performance is assessed indirectly through the evaluation by the AGA, the internal KPIs, and by external audit results.

Also, feedback from stakeholders and from Accountable Now IRP reflects upon the decision making bodies’ performance. The annual reports also provide indication of performance, which is used to inform the Chairperson, Co-Chairperson and Treasurer election and confirmation periodically.

#### K2: Inclusion of staff in discussing progress toward organisational accountability

The approach to the accountability reporting process is participatory, beyond the secretariat staff involvement in the report production, they
are also involved in internal policy development. Feedback from the Accountable Now IRP is shared widely across the membership.

The Panel commends this approach as it informs stakeholders on the commitment of the organisation for accountability. This is flagged as a strength in the report.

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<th>K3</th>
<th><strong>Scope of this accountability report and influence over national entities</strong></th>
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<td>The response explains how MIO-ECSDE supports its members on accountability related issues. MIO-ECSDE captured feedback from members on their confidence in their accountability expertise and practices, and it showed that members weren’t too confident.</td>
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<td>The Accountable Now Secretariat would be happy to explore how support could be provided to address gaps in accountability expertise and practice for MIO-ECSDE members.</td>
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