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# **Transparency International Independent Review Panel Feedback**

Accountability Report 2019

Review Round July 2021

Accountable Now · [www.accountablenow.org](http://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



# Transparency International

## Feedback from the Independent Review Panel

Review Round July 2021

20th July 2021

Dear Daniel Ericksson,

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.

Transparency International Secretariat's (TI-S) tenth accountability report demonstrates the efforts on refocusing its commitment to accountability, ending a hiatus of four years in which no accountability reports were submitted. The Panel has flagged several sections where the questions are not addressed or incomplete, and recommends reviewing the reporting guidelines and assessment criteria for future reports.

The Panel notes positively the amount of internal policies publicly available and encourages TI-S to continue to publish its policies, or at least share them with the Panel in future reporting cycles, as it will help to better assess accountability practices.

The Panel identified a number of specific strengths in the report: Reporting of the largest donors and their contributions (G4); availability of key policies and information on your website (G1); and, lessons learned in the reporting period (B2).

The Panel also noted positively the presence of policies in most of the areas covered, however has flagged several questions where there is no evidence or examples that demonstrate that the policies or approaches have been implemented throughout the organisation, that they are effective, relevant and adequate for the people or objectives they aim to serve.

Specific areas for improvement in the next report include: sustainability of your work (B1); people and partners have gained capacities that last beyond your immediate intervention (E4); evidence regarding the root causes of the problems you address



(F1); ensuring privacy rights and protecting personal data (G3); and, inclusion of staff in discussing progress toward organisational accountability (K2).

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





# Transparency International's Accountability Report 2019

Review Round July 2021

## Opening Statement from the Head of Organisation

In the statement, Daniel Eriksson, Transparency International Secretariat (TI-S) Interim CEO, emphasises the importance of accountability in TI-S's mission, values, principles and Strategy.

Key developments during the reporting period are outlined, including the inclusion of gender-specific questions in the *Global Corruption Barometer*, TI-S's leading role in the C20 Anti-Corruption Working Group, and important advocacy achievements at the EU level. The creation of a new governance body as a result of a consultation process with the Movement, is highlighted.

The Panel appreciated the summary of key developments in the statement, but encourages TI-S to include and reflect on key accountability challenges in future opening statements.

## Cluster A: Impact Achieved

### A. The impact we achieve

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| A1 | <b>Mission statement and theory of change</b><br><br>TI-S's mission statement is shared. The " <a href="#">Together against Corruption: Transparency International Strategy 2020</a> " is available online and was produced by inputs from more than 1000 contributions from within TI and 500 from external stakeholders. At Secretariat level <a href="#">a 5-year TI-S Implementation Plan (2016-2020)</a> outlines how the Secretariat contributes to the Movement's strategy. | 3 |
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|    | The Impact Monitoring approach is explained and a visualisation of the pathways to achieve change is shared. Two ToC, on Policy and Institutional Change and on Behaviour Change, are shared.   |   |
| A2 | <p><b>Key strategic indicators for success</b></p> <p>The '<a href="#">impact monitoring</a>' webpage indicates that TI-S has recently adopted a new approach to monitoring impact for its anti-corruption work, and explains the participatory approach to gaining a "better understanding what works in the fight against corruption, why and how it works." Examples to illustrate the approach are provided.</p> <p>The annual implementation plan (shared with the Panel), describes TI-S' priorities, objectives, and activities.</p> <p>Notwithstanding this, no information was provided regarding indicators of success, how this new approach had been implemented or what effect it has had on anti-corruption efforts. It was also noted that the annual implementation plan contained no review as to whether any of the actions contained in it had actually been achieved by TI-S.</p> | 2 |
| A3 | <p><b>Progress and challenges over the reporting period</b></p> <p>The response lists key achievements and a few challenges over the reporting period drawn from the <a href="#">2019 annual report</a>.</p> <p>It was noted however that the annual report covered the TI federation as a whole, while this accountability report focuses on the International Secretariat. In future, the Panel would like to understand the challenges over the period for the reporting entity.</p>   | 2 |
| A4 | <p><b>Significant events or changes regarding governance and accountability</b></p> <p>Two major changes in governance, agreed at the Annual Membership Meeting in 2019, are listed. These are the creation of the new governance body (as mentioned in the opening statement), and the expiry of Individual Membership. At the time of review, the Panel has found information regarding Individual Membership on its website (e.g. <a href="#">here</a>). Is this change already implemented? It is also unclear why these changes</p>  | 2 |



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|  | <p>were implemented, and what impact they are designed to have on TI-S's governance.</p> <p>In future, the Panel would like to understand significant events or changes related to broader accountability, not just in governance.</p>  |          |
| <b>B. Positive results are sustained</b> |   |          |
| B1                                       | <p><b><i>Sustainability of your work</i></b></p> <p>The brief response addresses the fundraising function being expanded and heavily invested on to ensure financial sustainability of the organisation.</p> <p>TI-S implements its programmes through local organisations, which are supported so that stakeholders know better their rights and can play an active role in demanding accountability. It is unclear though how this is done, how needed capacities are identified and prioritised, and how TI ensures that capacities gained are sustained beyond the project cycle, for long-term positive results (as per Commitment 4).</p> <p>Sustainability in this context however, is not about the sustainability of the organisation itself, but about the sustainability of its work. No information has been provided on this, and as such, the Panel is unable to assess TI's progress in this area.</p> | <b>1</b> |
| B2                                       | <p><b><i>Lessons learned in the reporting period</i></b></p> <p>A link to an <a href="#">external evaluations site</a> is shared, and the <a href="#">Mid-Term Review of the TI Strategy 2020</a> highlighted.</p> <p>The Panel commends TI-S for publicly sharing evaluation reports, as it is a good practice. In the next report, it would be helpful if TI-S could summarise some key lessons learnt, present how they were drawn from the Monitoring, evaluation and learning (MEL) system presented in A2 and outline plans or responses to address issues and opportunities.</p>   | <b>3</b> |
| <b>C. We lead by example</b>             |   |          |
| C1                                       | <p><b><i>Excellence on strategic priorities</i></b></p> <p>Some examples of partnerships and collaboration with peers and stakeholders are shared to illustrate how TI-S "demonstrates excellence" in</p>   | <b>2</b> |



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|    | <p>its priorities. Notably, TI-S's leading role in the C20 Anti-Corruption Working Group is mentioned, along with related initiatives. TI-S remained the secretariat of the UN Convention against Corruption coalition, participated on IMF and World Bank Panels to provide recommendations on anti corruption.</p> <p>It is however unclear how these examples directly relate to its strategic priorities. The Panel would appreciate it if TI-S could reflect more on this in its next report.</p>   |   |
| C2 | <p><b>Expertise is recognised and welcomed by peers and stakeholders</b></p> <p>The traditional media coverage of TI-S's work, visits to the website, newsletter reach, and social media followers are listed for the reporting period.</p> <p>TI-S's participation in networks and conferences is mentioned. It is stated that key services such as the Corruption Perceptions Index (CPI), and the Global Corruption Barometer (GCB) are used by peers and academia as reference in anti-corruption work.</p> <p>In the next report, the Panel would recommend to also include how expertise is recognised and welcomed by peers in other areas of work, beyond research (e.g. advocacy and or training).</p>  | 3 |
| C3 | <p><b>Inclusivity, human rights, women's rights and gender equality</b></p> <p>It is stated that TI-S' commitment to the protection of human rights, to uphold diversity, and to apply standards equally, is reflected in the following TI-S' policies: <a href="#">Code of Conduct</a>, the <a href="#">Whistleblowing Policy</a>, and <a href="#">PSEAH Policy</a>.</p> <p>A <i>competency-diversity-matrix</i> for both, the Board of Directors, and the International Council is being developed to ensure diversity. It also states that TI-S aspires to secure equal opportunities for its staff, and a Gender and Diversity policy has been created to support the mainstreaming of gender and diversity principles. An integrity system and an integrity office is in place. The Panel appreciates this outline of initiatives and systems aiming at ensuring inclusivity, human rights and gender equality at the</p> | 2 |



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|    | <p>organisational governance level (ie. internally), and notes that some of them would have fitted better in question H3.</p> <p>At a programmatic level, examples of gender-sensitive work are shared. Also, several strategic partnerships with organisations engaged in advancing women's rights are listed.</p> <p>In the future reports, the Panel suggests to consider inclusion beyond binary gender, covering diversity factors such as age, nationality, disability, ethnicity, etc.</p>  |   |
| C4 | <p><b>Minimising negative impacts on stakeholders</b></p> <p>The <a href="#">Impact Monitoring</a> approach considers who is affected by TI-S's work and whether negative or unintended consequences can be expected. No information however was provided on how this approach has been implemented or the impact that it has had.</p> <p>TI-S protects victims and witnesses of corruption, who can safely report corruption cases through the GlobalLeaks reporting platform and Advocacy and Legal Advice Center (ALAC) digital platforms. The latter provides confidential 2-way communication between the reporting person/whistleblower and the TI-S lawyer working for the ALAC. Examples of initiatives to raise awareness and to enable access to the ALACs by most vulnerable groups are provided. Beyond digital confidentiality, how do ALAC mobile units ensure the safety of people who report corruption cases ,?</p> <p>It would also be helpful if in future reports, if TI-S could broaden its response in this area, and look at all stakeholders (both direct and indirect).</p> | 3 |
| C5 | <p><b>Responsible stewardship for the environment</b></p> <p>The Transparency International Green Task Force (TIGRE) was revived in 2019 (after a number of years in hiatus). TIGRE's objectives are integrating environmental concerns into decision making, promoting environmental awareness among staff, and reducing waste and pollution. It is stated that CO2 emissions are measured and that there is a 5% reduction goal a year. The Sustainable Travel Policy mentions travel limitations but those are not specified. It is unclear however how often the TIGRE meets, who is part of</p>   | 2 |





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|   | <p>this task force, how priorities are defined (Berlin site only versus other offices such as Washington) and whether or how its decisions are enacted, and their mandate within the global movement.</p> <p>The Panel appreciates the update on TIGRE and the Policy being shared. In future reports, could TI-S provide an overview of emissions, and more details on how the travel policy specifically supports reduction of CO2 emissions (it might be useful to share the Sustainable Travel Manual referred to in the policy)?</p>   |          |
| <b>Cluster B: Stakeholder Involvement</b>                 |   |          |
| <b>D. Key stakeholders are identified with great care</b> |   |          |
| D1  | <p><b>Key stakeholders and how they are identified</b></p> <p>The report states that there is detailed analysis and processes to identify each project's stakeholders, and that main stakeholders are listed.</p> <p>The response would benefit from providing details on the actual process, criteria and tools used as well as including examples of what the detailed analysis and process look like, so that readers could understand how various stakeholders (i.e. people and communities you work for and with, partners and organizations TI-S is targeting for advocacy, etc.) are identified and prioritised.</p> | <b>2</b> |
| D2  | <p><b>Reaching out to those impacted or concerned by your work</b></p> <p>The report states that while every project is different, a participatory approach throughout the entire project cycle is highly encouraged. However there is no standardised process in place, or tools to provide guidance for constituents.</p> <p>Several examples of initiatives and services that enable stakeholders' participation are shared, such as the Impact Monitoring Approach (IMA), though it was noted that the approach was new (meaning it was unclear as to whether it had been fully embedded).</p>                          | <b>2</b> |



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|  | With regards to the Independent Evaluations, the Panel would like to understand how TI-S implements the learnings from them in its ongoing work.   |   |
| D3   | <p><b>Maximising coordination with others operating in the same space</b></p> <p>The response describes the accreditation process for individuals or organisations to become part of the TI movement. It also outlines the requirements for the National Chapters to become 'fully accredited'.</p> <p>This question however, seeks to understand how TI-S works in partnerships with <b>other organisations and actors</b>, and how partners are identified. TI-S might find <a href="#">CIVICUS' response to this question in their report (pp.10)</a> helpful to understand the scope here.</p>   | 1 |
| <b>E. We listen to, involve and empower stakeholders</b> |  |   |
| E1   | <p><b>Stakeholder feedback</b></p> <p>The response mentions the consultation process carried out in 2014 and 2015 to inform the Strategy 2020. It is mentioned that projects "have their own processes of involving key stakeholders in planning, monitoring and evaluations".</p> <p>Internally, feedback is sought for major decisions and it is done via surveys. At TI-S, the Works Council engages regularly with staff and management, and the annual staff survey is used to gather feedback. Other formal feedback mechanisms at TI-S are listed.</p> <p>The response would benefit from including examples that illustrate how the processes for involving stakeholders work in practice, and explaining how TI-S ensures that those processes are in place. The Panel would also recommend that in the next report, TI-S includes: how stakeholders (internal and external) were engaged in the development of the Strategy 2030 (as presented in the statement from the interim Chief Executive Officer); how staff survey results were acted upon; what the feedback provided by AMM participants was; and, how their recommendations for improvements are followed up, ect.</p> | 2 |
| E2   | <b>Stakeholder engagement</b>  | 2 |



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|  | <p>It is stated that TI-S consults with chapters, donors and other partners at different phases in programme development and implementation. Several examples of diverse types of consultations at different levels are shared.</p> <p>The response also addresses how TI-S involves internal stakeholders through different processes, most of them informal ones.</p> <p>The Panel notes that the bulk of the response appears to focus on members, partners and donors. Examples of engagement and information on engagement with intended beneficiaries of TI-S' work, would also have been helpful.</p>   |   |
| E3   | <p><b>Main likes/dislikes from stakeholders and organisation's response</b></p> <p>The report states that regular exchanges take place between the Movement, donors, partners and other stakeholders. The response mentions the high turnover and "other internal challenges", caused by the organisational change process commenced in 2018. Measures adopted by TI-S after serious allegations were published in an article in the media, are outlined.</p> <p>Notwithstanding this, the Panel would like to understand what processes and procedures TI-S has in place to seek feedback on the organisation by all stakeholders (per the initial question).</p> | 2 |
| E4   | <p><b>People and partners have gained capacities that last beyond your immediate intervention</b></p> <p>The response refers to the accreditation process (mentioned in D3) and to training delivered within TI-S. The scope of this question is broader and TI-S should describe policies/processes/initiatives that ensure TI-S's work is sustainable and that people and partners (outside TI movement) continue to benefit from its efforts after the official end of projects and interventions. The Panel recommends providing examples of the sustained capacities gained by people and partners and how they benefited from that.</p>                      | 1 |
| <b>F. Our advocacy work addresses the root cause of problems</b> |  |   |
| F1   | <b>Evidence regarding the root causes of the problems you address</b>  | 1 |



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|   | <p>TI-S engages with civil society, governments, business and international organizations' representatives to better understand the context, causes and consequences of corruption. TI-S also works with investigative journalists to seize opportunities for policy change and legal accountability. <a href="#">Examples</a> are provided to illustrate this approach.</p> <p>TI-S's flagship tools, CPI and GCB, and the 2019 "<a href="#">Who is behind the wheels? Fixing the global standards on company ownership</a>" report, are shared as examples of initiatives that seek evidence to support TI's advocacy work. The <a href="#">Helpdesk</a> service is also described as a key service for National Chapters and partners that provides evidence to inform anti-corruption interventions.</p> <p>Notwithstanding the work outlined above, the Panel would like to understand more around what initiatives TI-S has initiated regarding understanding - and addressing - the root causes of corruption.</p> |   |
| F2  | <p><b>Stakeholders support your advocacy work and value changes achieved</b></p> <p>TI-S works closely with National Chapters and stakeholders in their advocacy strategies. Various forms of involvement are listed, from phone calls to the coordination of actions and evaluation of results. Some examples of joint initiatives with other organisations are shared. It is stated that a stakeholder engagement approach to research tools is prioritised.</p> <p>The Panel would like to understand a little more what formal tools or procedures TI-S has in place to ensure that the advocacy work is systematically supported by the people TI works for, not just by national chapters. How does TI-S ensure that changes occurring as a result of your advocacy are welcomed by people and communities you work for?</p>  | 2 |
| G. We are transparent, invite dialogue and protect stakeholders' safety |   |   |
| G1  | <p><b>Availability of key policies and information on your website</b></p> <p>A <a href="#">dedicated webpage</a> compiles information on governance, integrity system, institutional relationships, financial reports, and policies (<a href="#">available here</a>) on integrity, PSEAH, child protection and anti-harassment.</p>  | 3 |



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| G2   | <p><b>Pay scale, gender pay gap and top salaries</b></p> <p>TI-S' standard compensation system ensures consistent pay practices and does not differentiate between internationally and locally hired employees. The gender gap pay and ratio between the top and bottom salaries are provided.</p> <p>To better understand this however, it would be useful to share the relevant policy - and how its implemented - with the Panel. The Panel invites TI-S to reflect (in the next report) on the gender-pay gap raised in this report.</p> | 3 |
| G3   | <p><b>Ensuring privacy rights and protecting personal data</b></p> <p>TI-S's approach to privacy is addressed in this <a href="#">dedicated webpage</a>. The Panel notes however that the link only relates to the privacy of those visiting TI-S's website. In this context, the question is far broader and relates to privacy rights and personal data of stakeholders more broadly.</p> <p>Does TI-S have a separate, stand alone privacy policy on privacy and protecting personal data, and if so, how has it been implemented?</p>    | 1 |
| G4   | <p><b>Largest donors and their contributions</b></p> <p>TI-S's <a href="#">donations policy</a> is publicly available. The four largest donors and their contributions are provided.</p> <p>The Panel commends TI-S for publicly naming the donors for all amounts received of \$1,000 and above (including listing them in their annual financial accounts). This is considered a good practice.</p>  | 4 |
| Cluster C: Organisational Effectiveness              |  |   |
| H. Staff and volunteers are enabled to do their best |  |   |
| H1   | <p><b>Recruitment and employment is fair and transparent</b></p> <p>The report briefly outlines how the TI-S <i>Recruitment Guidelines</i> set out processes and roles &amp; responsibilities. A table depicting basic employee statistics such as gender and years at TI, is provided.</p>  | 2 |



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|    | <p>The Panel suggests sharing Recruitment Guidelines in future reports, or if not publicly - at least with the Panel - in order for it to properly assess the response to this question. Moreover, it would be good to explain how TI-S ensures that the principles in the guidelines are followed.</p>  |   |
| H2 | <p><b>Staff development</b></p> <p>The response states that TI-S has a Learning &amp; Development Policy and initiatives are adapted to the available budget. A wide range of training programmes in very diverse areas are outlined.</p> <p>The Panel suggests sharing the policy in future reports, in order to better assess the response to the question. In addition to this, while various trainings are listed, additional details such as number of times the training was conducted, how many participants attended, and what criteria was used to select them, would have been helpful..</p> <p>Another metric that would be useful to understand is the proportion of TI-S's overall budget was spent on learning and development.</p>  | 2 |
| H3 | <p><b>Safe working environment</b></p> <p>TI-S has a Health &amp; Safety System that is in line with requirements by German law. New staff are inducted on the system and refreshers are provided to all staff regularly. Counselling and coaching are available on demand through the <i>Employee Assistance Programme (EAP)</i>.</p> <p>TI-S has an <a href="#">anti-harassment policy for its events</a>. A phone number is available to the entire movement in case of emergencies.</p> <p>The Panel has found the <a href="#">PSEAH policy</a> that applies to TI-S workplace. It is mentioned that "National Chapters are responsible for complying with their local regulation on safe work". In future reports, the Panel suggests to explain TI-S role in ensuring a safe working environment -beyond complying with local regulation - for all the Movement's staff in all National Chapters. It would be also useful more information such as the number of refresher trainings conducted and how many staff have made use of the counselling and coaching via the EAP. The Panel would like to</p> | 3 |



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|   | better understand whether staff based in Washington is subject to the same systems and initiatives as the staff based in Berlin.   |          |
| <b>I. Resources are handled effectively for the public good</b> |  |          |
| I1  | <p><b>Resources are acquired in line with your values, globally accepted standards and without compromising independence</b></p> <p>The <a href="#">TI Donations Policy &amp; Guidelines</a> is publicly available and the due diligence process is annexed to the report. While it is currently under review (with the exception of listing all donors for amounts of \$1,000 and above) the policy document lacks guidelines as to how it should be implemented.</p> <p>The Panel notes that while TI-S has a due diligence process in place for donors, it does not appear to include risk areas such as exposed persons and AML/CTF.</p>   | <b>2</b> |
| I2  | <p><b>Monitoring of progress and re-allocation of resources</b></p> <p>The report briefly describes the process for monitoring financial resources, which, depending on the scope, is done at different levels in the organisation. An 'expert Panel' is mentioned, who is in charge of prioritising investments based on timelines, strategic relevance, and the destination of resources. More information on the make-up of the 'expert Panel', and whether its role has been formalised would be appreciated.</p>  | <b>3</b> |
| I3  | <p><b>Minimising risk of corruption, bribery and misuse of funds</b></p> <p>The Report states that there is a formalised internal control environment in place, which includes the application of IFRS, qualified finance staff, and various other tools. Training on corruption and fraud risk minimisation is offered to staff and partners.</p> <p>There is a risk management system in place and an Audit and Risk Committee of the Board, which meets quarterly. Processes to address risks when partners are involved, have been developed in response to previous incidents. It is stated that processes for investigations are outlined in the policies, however these policies haven't been shared with the</p> | <b>3</b> |



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|  | <p>Panel, making it difficult to fully assess the answer. Also the response will benefit from providing data on relevant situations being referred to.</p> <p>In future, the Panel would also like information on how often fraud and anti-corruption training is undertaken, and how many staff and partners have attended.</p>  |          |
| <b>J. Governance processes maximise accountability</b> |   |          |
| J1   | <p><b>Governance structure and recruitment of trustees/board members</b></p> <p>TI-S' governance bodies are listed. The Board of Directors composition and terms are outlined.</p> <p>The Panel points out that part of the question here is not addressed, specifically how Board members are replaced/recruited, how diversity and fair representation is addressed. This <a href="#">Sightsavers' accountability report (pp. 31)</a> might provide some practical indication on what it is expected in this question.</p> <p>In addition to this, the Panel would be interested in understanding whether board membership of its member organisations is monitored, and subject to the same terms regarding recruitment. ,</p> | <b>2</b> |
| J2   | <p><b>Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes</b></p> <p>Several Board Committees have been established to monitor risk and ensure compliance with financial regulation. The <i>Ethics Committee</i> (<a href="#">ToR here</a>) advises on "principles, structures and processes for the highest standard of ethical conduct" including on complaints processes. An overview of complaints is presented to the Membership Meeting.</p> <p>More information however would have been appreciated on how these various committees were functioning, such as the number of meetings held, attendance rates, achievements, etc.</p>                                   | <b>2</b> |
| J3   | <p><b>Complaints handling mechanisms and overview of complaints (external)</b></p> <p>The <a href="#">Ethics and Integrity webpage</a> contains relevant policies and guidance on how to report integrity cases applicable for TI-S. The report</p>   | <b>2</b> |





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|  | states however that publication of case data is planned for the future. If this data is not available for the next report, the Panel suggests to include (in the report) an explanation for not making it public. It should be noted that without this information it is extremely difficult for the Panel to assess whether TI-S's complaints systems have been implemented or not.  |   |
| J4   | <p><b>Complaints handling mechanisms and overview of complaints (internal)</b></p> <p>The response refers to the Integrity system led by the Integrity officer and the relevant policies publicly available on TI-S's website (e.g. <a href="#">Code of Conduct</a>, <a href="#">Whistleblowing</a>). A Grievance Policy is also described, which provides a framework for resolving grievances. The Panel would have appreciated having access to this policy. An overview of actual complaints is not provided. As in J3 above, the Panel suggests to include in the next report an explanation for not making public an overview of internal complaints.</p> | 2 |
| J5   | <p><b>Protecting confidentiality and anonymity of those involved in complaints</b></p> <p>Complainants can choose whether to remain anonymous. TI-S states that it does not publish complaints' data which may help to identify the complainant. The <a href="#">TI-S Code of Conduct</a> and the <a href="#">TI-S Whistleblowing Policy</a> are linked in this response.</p> <p>No details however have been provided on how many anonymous complaints have been received, or what specific steps TI-S takes to protect the confidentiality and anonymity of complainants.</p>   | 2 |
| <b>K. Leadership is dedicated to fulfilling the 12 Commitments</b> |   |   |
| K1   | <p><b>The governing body and management are held accountable for fulfilling strategic promises</b></p> <p>The Board of Directors conducts a self-evaluation annually. The report also briefly outlines reporting lines between the Board of Directors, the Managing Director, and the annual Membership Meeting.</p> <p>The Panel would be interested in having access to the Board self-evaluation, and understand a little more about how the board and management are actually held accountable.</p>   | 2 |



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| K2 | <p><b><i>Inclusion of staff in discussing progress toward organisational accountability</i></b></p> <p>TI-S advised that this area needs to be improved, and It's intended to use participatory mechanisms to discuss feedback on accountability reports.</p> <p>The Panel points out that this question should also address how staff are involved in decision-making – for example through discussions about the organisation's accountability, successes, and challenges.</p> | 1 |
| K3 | <p><b><i>Scope of this accountability report and influence over national entities</i></b></p> <p>The Scope of the report is explained.</p> <p>Several compliance mechanisms that TI-S “demands” from its National Chapters are listed, including an <i>Accreditation Agreement</i>. (though it is unclear how compliance is managed or enforced). Could this be shared with the Panel in future reports?</p>   | 3 |