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Amnesty International Independent Review Panel Feedback

Accountability Report 2020
Review Round October 2021

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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



Amnesty International Feedback from the Independent Review Panel

Review Round October 2021

15th October 2021

Dear Agnès Callamard,

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.

Amnesty International's thirteenth report is very detailed and provides a comprehensive overview of the organisation's accountability practices.

The Panel has noted very positively the powerful opening statement highlighting the importance of dynamic accountability. The comprehensive overview of progress against the Strategic Goals (A3) and the key indicators used (A2) provided a sound mechanism to measure the organisation's impact. The Panel has also noted positively the participatory approach to the advocacy work at both, strategic and project level (F2).

The Panel has not found major areas of concerns and has flagged the following reporting questions to be addressed in the next interim report: Main likes/dislikes from stakeholders and organisation's response (E3), pay scale, gender pay gap and top salaries (G2), and staff development (H2).

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





Amnesty International's Accountability Report 2020

Review Round October 2021

Opening Statement from the Head of Organisation

The opening statement by Agnès Callamard, Secretary General of Amnesty International, highlights accountability and transparency as core values of the organisation, and summarises how they are prioritised in the next strategic period.

The statement addresses the impact that the Covid-19 pandemic has in Amnesty International and the adjustments in priorities and plans while changing ways of working.

It refers to the [previous accountability report](#), which outlined the work on internal culture and well-being at Amnesty International, as they continue to be a priority. The statement also outlines the work to identify and address reports of racism, including the appointment of an external expert to get an independent overview of staff perceptions on individual and systemic racism. The commitment from the Secretary General to work to root out racism is emphasised.

Listening to the multiplicity of stakeholders is highlighted as a way to strengthen the movement and a crucial element for the next strategic period.

The Panel notes positively the strong high-level statement about the importance of accountability to the organisation.

Cluster A: Impact Achieved

A. The impact we achieve

A1	Mission statement and theory of change The vision and mission of Amnesty International are shared, as well as the webpage where it is publicly available. The Strategic Goals , which applicable period has been extended, and the underlying Theories of Change are also shared.	4
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A2	<p>Key strategic indicators for success</p> <p>Amnesty International's success indicators are integrated in the Theories of Change, and the report explains that those are mainly qualitative. A table outlining the 'outcomes types' that is used to track the qualitative indicators is provided in the report, as well as an example on how the International Secretariat (IS) used them to produce a global picture of the organisation's impact.</p>	4
A3	<p>Progress and challenges over the reporting period</p> <p>Summary of progress against the Strategic Goals is reported, and a more comprehensive overview is provided in Annex I in the report.</p>	4
A4	<p>Significant events or changes regarding governance and accountability</p> <p>The approval of the new strategic framework, scheduled for 2020, was postponed to 2021, and a Covid-19 strategy was developed and adopted for the interim period between the two strategies.</p> <p>The report lists changes in the management positions in the organisations, and also at the International Board level.</p>	3
B. Positive results are sustained		
B1	<p>Sustainability of your work</p> <p>Amnesty International's project management methodology includes considerations for long-term impact, building stakeholders' capabilities and exit strategies. The report provides data from National Entities (NEs) on measures applied to ensure sustainability of their work, as well as examples from to NEs on how they have done so.</p> <p>The Panel notes positively the approach to sustainability and suggests to explore in future reports how sustainability could be measured, ie. How can realisation of outcomes by right-holders in the long-term can be tracked?</p>	3
B2	<p>Lessons learned in the reporting period</p> <p>The report explains that NEs share lessons learnt through annual reporting and the IS through a quarterly process per project. Project teams and the Global Strategy and Impact Programme (GSIP) create different spaces where these lessons are further shared, and a couple of examples illustrating the approach are provided.</p> <p>It is stated that among the lessons learnt shared, most were linked to the Covid-19, to engagement in partnerships, and to the consultation process for the next strategic framework. The Panel suggests sharing concrete</p>	3



	lessons learnt in future reports that might be of interest for other CSOs with similar missions and challenges.	
C. We lead by example		
C1	<p><i>Excellence on strategic priorities</i></p> <p>The report highlights the insights by Amnesty International sought by the UN in human rights themes. Also, the provision of capacity development for CSOs is highlighted, and several examples are provided, including the leadership role of Amnesty Brazil convening a group of 38 CSOs for a joint campaign on Covid-19 impact on vulnerable groups.</p> <p>The report also reflects on how AI learns and benefits from other actors in the sector, including Accountable Now.</p> <p>It is also stated that AI has a broad network of local allies, which in some cases leads to long-term partnerships.</p>	3
C2	<p><i>Expertise is recognised and welcomed by peers and stakeholders</i></p> <p>A process to consult Amnesty International's stakeholders in the context of the new strategic framework and the subsequent analysis provided insights on the added value of AI for its stakeholders. Freedom of expression & civic space expertise and historical credibility were highly appreciated by stakeholders. Engaging and nurturing partnerships to fight inequality and discrimination were also topics that AI provided added value on.</p> <p>Several prizes received are highlighted and links to relevant webpages shared.</p>	3
C3	<p><i>Inclusivity, human rights, women's rights and gender equality</i></p> <p>The report highlights the advocacy work on women rights to abortion, sex workers and LGBTI people in the context of Covid-19 pandemic.</p> <p>Internally, AI International Board commissioned a report to explore experiences of racism within AI and ways to tackle them. A working group was established and a plan developed with two workstreams: (1) addressing operations such training and recruitment, and (2) on structural and systemic issues. Two positions are created to roll out this work and to promote gender and other diversity perspectives in AI external work.</p>	3
C4	<p><i>Minimising negative impacts on stakeholders</i></p> <p>It is stated that the principle of "do not harm" underpins AI work. A working group explored IS safeguarding measures and a new Safeguarding policy</p>	3



	<p>(shared with the Panel) has been approved. Special attention has been given to young people groups, and measures to protect them were carried out, including background checks of new hires and Safeguarding training.</p> <p>Risk monitoring has been strengthened in the context of the pandemic, and funding has been made available for NEs to adapt their work.</p>	
C5	<p>Responsible stewardship for the environment</p> <p>The report provides data on GHG emissions (average) for all movement in 2020 broken down by source, and also provides some aggregation charts that include previous years data. However, it points out that the 2020 context does not allow for meaningful comparison of environmental footprint from previous years, as travel and office energy use has been dramatically reduced.</p> <p>It is stated that work to define the policies and strategy to achieve carbon neutrality by 2035 is continuing, and that concrete initiatives vary across the NEs.</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 refers to the 2018 accountability report as the way stakeholders are identified has not significantly changed, stakeholder mapping, power analysis and system mapping being the tools still in place.</p> <p>A chart showing stakeholders groups identified is shared, being governments, followed closely by community groups/ groups of right-holders, the stakeholder groups most identified. The Panel invites to elaborate in future reports about how the increasing virtual interaction through social media might pose challenges in human rights protection and therefore the need for alternative and secure ways to identify stakeholders.</p>	3
D2	<p>Reaching out to those impacted or concerned by your work</p> <p>Active participation is emphasised in the Strategic Goals, and right holders participation is monitored. Resources and initiatives within AI promote and support delivery of work in participatory ways. The report includes one of them, the participation ladder. Examples of participation at project level are shared.</p>	3



	Key insights on the way AI reaches its stakeholders drawn from an external evaluation, are shared, including strengths such as responsiveness and legitimacy & credibility. Also areas that required continuous attention when reaching out to right holders including power dynamics and sustainability of the relationships, are shared.	
D3	<p>Maximising coordination with others operating in the same space</p> <p>It is stated that working with partners is a “top tactic” to effect social change. Several examples of AI partnering with local actors are provided. The report also lists some areas for improvement drawn from an external evaluation. The answer would have been strengthened by providing more details on the areas for improvement mentioned, such as “internal coordination”.</p>	3
E. We listen to, involve and empower stakeholders		
E1	<p>Stakeholder feedback</p> <p>It is stated that the project management methodology requires AI to seek feedback from stakeholders, and that support and guidance are provided. The consultation process facilitated by GSIP to enable feedback seeking in the context of the new strategic framework, is outlined, including dates and links to evidence.</p>	3
E2	<p>Stakeholder engagement</p> <p>NEs were asked about the extent to which activists and stakeholders were involved to understand what phases of the project cycle needed more attention. At planning and implementation the engagement was high, at evaluation phases the engagement was lower. Some examples are provided to illustrate the type of involvement. A chart showing the percentage of entities involving activists and stakeholders is provided.</p> <p>Youth engagement is monitored by the Global Youth Team, who performed an analysis showing progress on the International Youth Strategy.</p> <p>The answer would have been strengthened by providing a reflection on the causes for the different engagement levels at the different phases of the project cycles and what plans are in place to improve in those which are lower.</p>	2
E3	<p>Main likes/dislikes from stakeholders and organisation’s response</p> <p>The primary collection feedback process was the consultation for the strategic framework already mentioned in the report (C2). As positive</p>	2



	<p>feedback is highlighted the expertise, global network, evidence-based approach, and credibility that AI brings. In terms of feedback for improvement, the need of enhancing work with partners was highlighted. The report explains that this feedback has been incorporated in the strategic framework development process.</p> <p>In future reports, the Panel recommends to explore here feedback from other stakeholders groups listed in D1, and also internal stakeholders such as staff and activists. A suggestion to keep the report concise, could be to focus on a particular stakeholder group in each reporting year.</p>	
E4	<p>People and partners have gained capacities that last beyond your immediate intervention</p> <p>Addressed in B1.</p>	
<p>F. Our advocacy work addresses the root cause of problems</p>		
F1	<p>Evidence regarding the root causes of the problems you address</p> <p>It is stated that AI monitors human rights situations in 140 countries and conducts targeted investigations into alleged human right violations. The scope of the research work and the methodology framework are briefly explained. Research teams at the IS are networked with local partners, and a wide range of stakeholders are involved. An example of work by the Crisis Team in Siria is provided.</p>	3
F2	<p>Stakeholders support your advocacy work and value changes achieved</p> <p>The report highlights the importance of not only involving victims and survivors of human rights abuses and Human Rights Defenders (HRDs), but also ensuring the amplification of their voices on the world stage. Also, safety and support of HRDs is emphasised. The report provides examples that illustrate the approach, including the Write for Rights campaign.</p> <p>The report also explains that a wide range of stakeholders are consulted when devising advocacy strategies, and provides an example illustrating this.</p>	4
<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>The report links to AI webpages where key organisational information in English, French, Spanish and Arabic can be found. The report also highlights the search function, which allows users to quickly find the desired</p>	3



	information. The report also acknowledges the Impact and Learning Reviews and evaluations haven't been regularly updated on the website.	
G2	<p>Pay scale, gender pay gap and top salaries</p> <p>The <i>Equal Opportunities and Diversity Policy</i> (shared with the Panel) mentions the commitment to equal pay, and more information on how this commitment is put in practice is available in this webpage, which also contains data on top salaries, gender pay gap, and ratio of the highest salary to the lowest. The latest update of the data was 2018, which is justified by the UK government delaying this obligation for organisations to report due to the pandemic.</p> <p>The Panel emphasises the importance of keeping this information and data updated as an exercise of transparency and accountability to key stakeholders beyond legal requirements.</p> <p>In 2019, AI has started to report to Fairshare on women in leadership positions. Has the reporting been discontinued? The Panel would be interested to know whether the exercise has been beneficial.</p>	2
G3	<p>Ensuring privacy rights and protecting personal data</p> <p>The Privacy Policy (applicable to all online systems) is publicly available and it outlines the standards in handling personal data while ensuring AI is compliant with UK data protection legislation.</p> <p>The Panel suggest to address this question in future reports from a offline system perspective too (eg. physical records of personal data.)</p>	3
G4	<p>Largest donors and their contributions</p> <p>The five largest donors (one is anonymous) and their contributions are listed. The report stated that an ethical screening policy (shared with the Panel) applies to all donors and that less than 10% of income is restricted, thus minimising risk of undue influence.</p>	3
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>It is stated that the AI Core Standards set out roles, responsibilities, policies, and behaviours to ensure recruitment and employment are fair. NEs report periodically on implementation, but since the <i>Core Standards</i></p>	3



	<p>(previous version shared with the Panel) are being reviewed, 2020 data is not available.</p> <p>The IS Equal Opportunities and Diversity Policy outlines the commitment to providing equal opportunities in the workplace. Nine 'protected characteristics' including race and sexual orientation are considered in the guidance provided for recruitment interviews.</p> <p>Basic staff statistics are provided, including gender breakdown for the Leadership team.</p>	
H2	<p>Staff development</p> <p>The Employee Experience Programme (EEP) is described. Through it, IS staff have been offered development opportunities on stress and resilience, mental health awareness, management and leadership development. The report recognises there is a gap between efforts and results, and points to “deep seated dynamic” as the cause for the gap.</p> <p>Staff development budget has been decentralised and teams control a set amount to invest in job-specific development.</p> <p>The Panel is not clear on what was the take-up of the training sessions. Also, a more elaborated response and reflection would have helped the Panel to understand what the “deep seated dynamic” means, ie. What are these dynamics - gendered, racial, both, something else entirely? Furthermore, given the powerful opening statement by the Secretary General acknowledging institutionalised racism, and the need to stamp it out, the Panel would have expected some related training (eg. race and unconscious bias) to be addressed here. Greenpeace accountability report (pp. 31) might provide some examples on how these kinds of training can be integrated into the overall staff development offering.</p>	2
H3	<p>Safe working environment</p> <p>At the IS, the <i>Bullying and Harassment Policy</i> is in place, which sets out how incidents are dealt with. Grievance investigations are outsourced as a result of feedback received about delays and inconsistencies, but according to staff surveys carried out in April and December 2020, the grievances management scored low. The plan to continue to address this issue is outlined.</p> <p>NEs ensure a safe working environment in alignment with the Core Standards and receive support by the IS in form of board inductions,</p>	3



	trainings, resources, the provision of a Well-being framework and other initiatives. Some examples of these are shared.	
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>Near 85% of AI comes from individual donors. The <i>Global Fundraising Policy and Guidelines</i> (shared with the Panel) governs fundraising activities, which provide 'minimum standards' and ensure complying with national laws and regulations.</p> <p>The report also explains there is a Gift Screening process to ensure AI does not accept funding from sources linked to the violation of human rights.</p> <p>In I3, it is stated that a Procurement Policy (shared with the Panel) is in place in the IS, and it ensures that good procurement practices are followed.</p>	3
I2	<p>Monitoring of progress and re-allocation of resources</p> <p>NEs provide quarterly updates on 'strategic goal spend' against budget, forecasts, and prior years. Financial reporting is available on this webpage.</p> <p>The IS carries out a high level 5-year budget planning aligned with strategic planning to optimise the use of resources.</p> <p>It is stated that regular finance and accountability sessions are held to discuss use of resources and to provide the space for NEs to ask questions. Examples of outcomes of these discussions are shared.</p>	3
I3	<p>Minimising risk of corruption, bribery and misuse of funds</p> <p>An <i>Anti-Fraud, Bribery and Corruption Policy</i> (shared with the Panel) is in place and sets out the responsibilities of staff encounters related. It is also emphasised that a zero-tolerance approach is taken and that AI is committed to learning from systems failures. An example of financial mismanagement and the learnings from it are shared.</p> <p>The report also mentions other relevant policies and procedures including Anti-Terrorism Vetting and Compliance, Anti-Money Laundering Screening Solution, and Financial Health Checklists.</p>	3
J. Governance processes maximise accountability		
J1	Governance structure and recruitment of trustees/board members	3



	<p>The composition of the Global Assembly, the highest decision-making body in AI, and of the International Board are explained. Their committees and other governance bodies are briefly outlined.</p> <p>A high level organigram outlining accountability lines among the different governance entities is provided.</p>	
J2	<p>Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes</p> <p>The Statute of AI, where the Board role is explained, is shared. The Board is involved in complaints and grievances processes where relevant and in line with the relevant policies. The Board also has Board-leads for specific themes, including Safeguarding.</p> <p>The report also mentions the Board involvement in risk and financial monitoring.</p>	3
J3	<p>Complaints handling mechanisms and overview of complaints (external)</p> <p>A dedicated webpage provides basic information on how to provide feedback and raise complaints. It also links to the feedback policy and procedure, which provides further information. In addition, the IS has a whistle-blowing policy and outsources management to a third party.</p> <p>In line with the Core Standards, NEs are responsible for having feedback and complaints mechanisms in place. The IS provided support in the form of a set of FAQs and good practices.</p> <p>Basic data on complaints received is provided. The Panel notes very positively the disclosure of this data.</p>	3
J4	<p>Complaints handling mechanisms and overview of complaints (internal)</p> <p>The IS has a Grievance Policy (shared with the Panel), which guides the handling of internal complaints. In 2020, only one case was recorded, which came through the International Board using the whistleblowing channel.</p> <p>Same as for the external complaints, NEs are responsible for having internal feedback and complaints mechanisms in place. If NEs fail to provide with the expected standard, the International Board has the authority to intervene. Basic data on complaints received by NEs is provided.</p>	3
J5	<p>Protecting confidentiality and anonymity of those involved in complaints</p>	3



	<p>Preservation of anonymity is the default unless an individual has given permission otherwise. The IS has developed and agreed a confidentiality statement that allows for confidentiality breaches in cases where there is a perceived risk of harm to self or others. Exceptions are explained up front and consent is always sought. Affected individuals are involved in identifying any solution to anonymity dilemmas.</p>	
<p>K. Leadership is dedicated to fulfilling the 12 Commitments</p>		
K1	<p><i>The governing body and management are held accountable for fulfilling strategic promises</i></p> <p>The independent International Nomination Committee assesses skills gaps in the governing bodies, which informs recruitment processes for when vacancies arise.</p> <p>The report stated that due to the pandemic the appraisal of the International Board was paused and it is planned to resume in 2021. Governance benchmarking is carried and an example on how this was used is provided.</p> <p>Annual appraisal process with 360 feedback is done for all IS management staff.</p> <p>An accountability framework for the Movement is being developed, which includes the review of the Core Standards.</p>	3
K2	<p><i>Inclusion of staff in discussing progress toward organisational accountability</i></p> <p>The report highlights the work on employee experience, racial equality, diversity and inclusion in IS, which has been transparently shared and communicated. The work by an external expert on anti-racism is explained here. Also, an example of involving staff in financial decision-making is shared.</p> <p>NEs have been included in the consultations for the development of the accountability framework described in K1.</p>	3
K3	<p><i>Scope of this accountability report and influence over national entities</i></p> <p>The Standard Action Reports from NEs are collected yearly, and they assess themselves against the Core Standards every two years. These two processes provide the inputs for the production of the accountability report. Additional information on the Core Standards, which are currently under review, is provided.</p>	3



	NEs report financial information quarterly for consolidation purposes (available in this webpage). The scope of the accountability report is explained.	
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