

# Greenpeace International Independent Review Panel Feedback

Accountability Report 2020 Review Round December 2021



# Greenpeace International Feedback from the Independent Review Panel

**Review Round December 2021** 

#### 21st December 2021

Dear Jennifer Morgan,

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.

As this is the last review of Greenpeace by Accountable Now, the Panel's assessment is written in a different way from previous ones. Most obviously, there are no statements of the sort 'in the next report, the Panel would like to suggest..'. Instead, the Panel has made some suggestions Greenpeace might like to consider for their accountability reporting in general.

Aspects of the organisation's commitment to dynamic accountability, particularly the aspects of collaboration, working in partnership, and learning, are clear throughout the report. The Panel has appreciated reading about the organizational commitment to, for instance, sustainability and learning, as well as how Greenpeace checks the pulse of and engages with the general public. A number of good practices can be drawn from the examples shared. The Panel has also noted Greenpeace's agile and innovative responses to the disruption caused by the pandemic, as well as its response to the BLM movement and its implications for the organization itself.

Nevertheless, there remain a number of areas in which organizational accountability could be improved. One is setting measurable indicators of successful organizational performance. Another relates to ensuring that a broad range of stakeholders, as they have been identified in D1, are reached out to, their feedback is collected and they are effectively engaged. Limiting this interaction to what appears to be only a certain type of stakeholders only (in C2, D2, E1 and E2 the report does not consider external stakeholders beyond campaign audiences) poses the risk of failing to listen to and consider other relevant views and perspectives. Greenpeace should consider strengthening its human rights-based approach so that, for instance, communities who are most impacted by the issues



on which the organization is working are effectively engaged. The implementation of the external complaints policy has also been long overdue.

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





## Greenpeace International's Accountability Report 2020

**Review Round December 2021** 

### Opening Statement from the Head of Organisation

The opening statement by Executive Director Jennifer Morgan emphasises that global major disruptions that 2020 brought, have exposed realities that are not new, and also that systems can be changed rapidly.

Greenpeace's responses to the disruptions on several fronts are highlighted: taking care of the staff, and working with the Black Lives Matter movement to better understand how Greenpeace can be actively anti-racist take prominence in the Statement.

Engagement with stakeholders and the integrity related training are also highlighted. The report emphasised the learning opportunities seized in 2020. The Panel notes positively the transparency in whistleblowing and complaints developments. The Panel commends the learning mindset that the opening statement projects in these times of global disruption.

# Cluster A: Impact Achieved

### A. The impact we achieve

A1	Mission statement and theory of change	3
	The mission and vision are shared. The <u>Greenpeace Framework</u> , which includes theories of change for disruption and culture, is shared. It is stated they were developed through a consultative process.	
A2	Key strategic indicators for success	2
	The report links to a <u>webpage</u> where Greenpeace International's (GPI) four functions and eight priorities are outlined. A new Global Programme Plan 2020-22, which focuses on climate change and biodiversity loss, has been rolled out. The roles that different departments at GPI play in supporting NROs to measure impact are explained.	
	GPI does not seem to rely on indicators to measure its performance. The Panel appreciates that Greenpeace operates in a dynamic and challenging environment with many variables which may make the	



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	articulation of relevant indicators more difficult. Nevertheless, it is not clear to the Panel what Greenpeace considers successful performance and how this is monitored and measured. The Panel notes the newly developed guidance for NROs on how to measure impact as well as the COVID-19 Response Guidance for Impact measurement, The Panel would recommend sharing its strategic indicators so that	
	stakeholders can hold the organisation accountable.	
A3	Progress and challenges over the reporting period	3
	The report concentrates on the responses of Greenpeace National and Regional Offices (NROs) to the Covid-19 pandemic and GPI adaptations to better support the global network in the unprecedented context of disruption.	
	It is stated that NROs that had defined their impact goals beforehand, saw increased and accelerated engagement from audiences in campaigns. However, many NROs were still structured to campaign in siloes and without overall alignment.	
	The Panel notes positively the examples of agile adaptations of work, which demonstrate a meaningful engagement with people and communities Greenpeace works for and with. The Panel notes Greenpeace's, innovative and creative responses to the pandemic which have enabled it to adapt quickly.	
A4	Significant events or changes regarding governance and accountability	3
	The report refers to changes in ways of working to adapt to the pandemic context, including instituting flexible working and improving employee wellbeing support (a whole page capturing duty of care developments is shared). Changes in leadership are outlined, and the composition of the GPI Board described.	
	The Panel takes note of a number of mechanisms which have been (or are being) developed in response to or in spite of the operational challenges imposed by the pandemic.	
B. Po	ositive results are sustained	
B1	Sustainability of your work	3
	It is stated that Greenpeace believes in the need for a long-lasting, sustainable movement. Key to this is developing strong connections with	



	partners and supporters, widely sharing tools, systems and lessons learned, and co-creating effective campaigns.	
	The report lists some of the ways in which Greenpeace works towards sustainability. In addition to the ones that were also listed in the previous report, enabling staff and volunteers to become champions and promoting Justice, Equity, Diversity, Inclusion and Safety is included.	
	The Collective Climate Action project is described as an example of Greenpeace's approach to building a long-lasting movement.	
	Furthermore, the approach of running 'open actions' is shared as it illustrates how sustainability and long-term considerations are embedded in projects.	
B2	Lessons learned in the reporting period	4
	The report describes several initiatives and processes in place to enable the capture and sharing of learning, including the three-year strategic plans (3YSP) and the Organisation Development Plan (ODP) which NROs use to reflect, share and track alignment with shared direction from the global movement.	
	The role and learning-related responsibilities of the GPI# Impact Monitoring and Evaluation Team (IM&E) are also explained, which include the compilation and meta-analysis of evaluations conducted by NROs.	
	NRO to NRO learning is also highlighted and an example is shared. Furthermore a case study of GP MENA Covid-19 response is shared, which provides insights into the learnings from an innovative project.	
	The Panel commends Greenpeace on the many ways in which the organization learns, enables learning and shares it among the various parts of the organization. It takes particular note of the practice of collecting evaluations from all NROs into a single database which is accessible and searchable.	
C. W	/e lead by example	
C1	Excellence on strategic priorities	3
	The report explains how Greenpeace explores the root causes of the issues it campaigns on. The GPI's Science Unit at the University of Exeter provides scientific advice and analytical support to campaigns,	



	The report emphasises the importance of working with allies in a "cooperative and humble way", and mentions global coalitions Greenpeace is part of such as the Climate Action Network, while stating that most collaborative work happens at national and regional level.	
	The Panel notes thatGreenpeace's work is guided by science and peer-reviewed research.	
C2	Expertise is recognised and welcomed by peers and stakeholders	2
	The report explains that the public perception of Greenpeace is assessed through online surveys and national brand surveys (though it is unclear who exactly is surveyed and how it is carried out). A headline overview of the latest results was shared, which shows people associate Greenpeace with defending what is at risk more than with proposing solutions. Copies of the survey results were not shared with the Panel.	
	Examples of the reach of and reactions to campaigns are shared, including the work with peers from the BLM Movement.	
	Greenpeace is clearly committed to assessing public perception and drawing learning from the findings of such assessments. In the view of this, the Panel feels it would have been beneficial to see evidence of the involvement of and recognition by peers and other stakeholders as well.	
C3	Inclusivity, human rights, women's rights and gender equality	2
	The seven core principles that guide NROs, which have diversity and inclusion as cross-cutting themes, are shared.	
	A 'Justice, Safety and Diversity' (JSD) team is responsible for implementing an action plan which includes five initiatives listed in the report. A Taskforce was set up to conduct a listening exercise and to review JSD progress, which was reported along with a set of recommendations to the Executive Directors Meeting (EDM). A Global Equity, Diversity and Inclusion survey was conducted among staff and volunteers, its key figures are shared.	
	The EDM unanimously approved a roadmap with next steps informed by the information gathered from the different initiatives and consultations.	
	A list of further works in this area for the future is shared.	
	The Panel appreciates the effort and resources Greenpeace has invested in strengthening its organizational diversity and inclusion. However, the Panel notes that the crucial issues on which Greenpeace	



	works, namely the climate and biodiversity crises, have a profound impact on a variety of human rights of communities that are most affected by such crises, among them indigenous peoples and in particular women and girls. The Panel would like to have understood how Greenpeace takes into account the human rights of such communities.	
C4	Minimising negative impacts on stakeholders	3
	The report states that Greenpeace's duty of care approach includes support for dangerous and emergency situations, security planning, and management and control of situations among others.	
	Safe Working Procedures, risk assessments, exit strategies are developed at local level. At GPI, the Essential Principles and Protocols for Legal and Actions (EPPAL) provides guidance on potential risks and informed consent for those involved in activities. The EPPAL is shared and promoted internally.	
C5	Responsible stewardship for the environment	3
	It is stated that as part of Greenpeace's environmental management programme, NROs are encouraged to implement an environmental baseline. These efforts are backed by several policies, including a global environmental policy, a sustainable procurement policy, and a sustainable food policy, among others listed in the report.	
	CO2 emissions for the past five years (2020's data does not include all NROs) is shared in a comprehensive table which shows a large decrease in 2020 due to the Covid-19 travel restrictions. The report explains the use of helicopter transportation for an <u>emergency campaign from</u> <u>Greenpeace Brazil</u> .	
	The report also explains the commitment to reduce environmental impact from the use of vehicles.	
Clu	ster B: Stakeholder Involvement	
D.K	ey stakeholders are identified with great care	
D1	Key stakeholders and how they are identified	3
	Greenpeace views its stakeholders as including governments, media, corporations, and those who depend on the industries and ecosystems impacted by Greenpeace's campaigns. Stakeholders are identified on	



	global and NROs levels as part of campaign planning processes. A description of such a process is shared.	
	GPI has developed a set of audience research guidelines that puts people at the centre of campaign development, aiming to support NROs identifying stakeholders. Key recommendations included in the guidelines are shared.	
	A Global Engagement Plan outlines "the importance of joining, growing and supporting aligned movements as well as collaborating with diverse groups of people to build solutions and challenge the root causes of environmental problems".	
D2	Reaching out to those impacted or concerned by your work	2
	The report addresses how Greenpeace was informed about and sought to understand the general public's feelings, behaviour shifts, and mindset shifts in the context of the pandemic to inform campaigns.	
	The Panel understands that knowing the public pulse is critical for the effectiveness of the work of Greenpeace. It would like to highlight, nevertheless, that those impacted or concerned by its work are varied, and go far beyond the general public. In particular, communities most affected by climate and biodiversity crises are also the most impacted and concerned by the work of Greenpeace. In addition to this, is the impact on those stakeholders whose behaviour Greenpeace is trying to influence or change (e.g. governments and corporations) considered?	
D3	Maximising coordination with others operating in the same space	3
	The report states that Greenpeace invests in building sustainable relationships with supporters and allies by providing support, capacity, tools and training. Also, Greenpeace's campaigns enable supporters to proactively engage and even create their own. A Campaign co-Creation Pathway was developed to support collaborative design and development of campaigns.	
	Greenpeace's approach to alliance building and co-creating campaigns mandates assessing how to connect and support existing grassroots initiatives before launching a campaign.	
E. W	e listen to, involve and empower stakeholders	
E1	Stakeholder feedback	2



	The report evolution that feedback is eathered from statistical states the	
	The report explains that feedback is gathered from stakeholders through a variety of means, including one-to-ones with campaigners and teams, through the website, dedicated phone line, email address, and via Greenpeace's social media channels.	
	Greenpeace conducted a Global Polling Survey to gauge public's behaviour and mindset shifts on climate and biodiversity loss.	
	Three examples from NROs seeking feedback from stakeholders are shared.	
	The report also lists channels to seek feedback from employees, including meetings and multi-level consultations, and shares an example from NRO's 360 feedback mechanism.	
	The Panel notes with interest the use of technology and social media to obtain feedback from the general public. It would, moreover, have liked to learn how Greenpeace obtains feedback from other stakeholders (as noted in earlier comments).	
E2	Stakeholder engagement	2
	Stakeholders are given the opportunity to contribute to Greenpeace's strategic design processes, M&E, and decision making at NRO level. An <u>example from Greenpeace India</u> is provided to illustrate the approach.	
	The report outlines initiatives led by NROs to better engage with the public in the context of the Covid-19 pandemic. Indicators used to measure stakeholder engagement in Greenpeace campaigns are shared.	
	The Panel appreciates the comprehensive response about how Greenpeace engages audiences in its campaigns, and invites Greenpeace to reflect on how other stakeholders (more broadly) are engaged, particularly governments and corporations, as insights on these engagements may provide sharable learnings for other advocacy organisations.	
E3	Greenpeace engages audiences in its campaigns, and invites Greenpeace to reflect on how other stakeholders (more broadly) are engaged, particularly governments and corporations, as insights on these engagements may provide sharable learnings for other advocacy	2



	While the Panel commends the transparency and openness in sharing	
	feedback, and for using it for reflection and improvement, it notes that the examples relate exclusively to complaints handling by Greenpeace. The Panel would be interested to learn how other types of feedback, not related to complaints handling, are analysed and learning derived.	
E4	People and partners have gained capacities that last beyond your immediate intervention	2
	While the report does not address this point specifically, the Panel notes from previous sections the approach by Greenpeace whereby the effects of the support, capacity, tools and training shared with partner organisations are expected to last beyond the joint project work. The Panel would have wanted to see this elaborated in some detail and specific examples provided.	
F. O	ur advocacy work addresses the root cause of problems	
F1	Evidence regarding the root causes of the problems you address	3
	In C1, it is explained how a dedicated science team provides evidence to ensure that root causes are addressed in Greenpeace's campaigns and activities. An 'Operations Guidance' provides priorities and promotes the design of science-backed investigations.	
F2	Stakeholders support your advocacy work and value changes achieved	2
	It is stated that Greenpeace actively involves their supporters in their campaigns through different channels, including crowdsourced investigations. In sections E1 and E2, it is addressed how Greenpeace gathers feedback and engages with the public to check what the best ways are to engage citizens in their advocacy work.	
	While Greenpeace appears very diligent in the commitment to understand public perception and listen to the audiences at large, the Panel would have appreciated learning how communities most affected by the climate and biodiversity crises view the campaigns and the advocacy work undertaken by Greenpeace. It would also have been interesting to understand if there were any changes in perception (towards Greenpeace) by any companies and/or governments whose actions Greenpeace seeksto change.	
	Ve are transparent, invite dialogue and protect eholders' safety	



G1	Availability of key policies and information on your website	1
	In Greenpeace's <u>website</u> , all GPI annual reports, Financial Statements and several key documents and policies are published.	
	The report lists several topics that are covered by policies and guidance documents (some of them have been shared with the Panel) which are being considered for publication.	
	The report highlights membership of Accountable Now and the adoption of the accountability commitments of the <u>Global Standard</u> . Membership in other accountability related platforms is also explained.	
	The Panel notes that, with the exception of the Model Code of Conduct, no other policies appear available for public scrutiny. The Panel considers making a sound organizational policy framework public to be the minimum first step towards organizational accountability.	
G2	Pay scale, gender pay gap and top salaries	2
	The report explains that NROs are invited to use a 'Global Compensation and Benefits Framework' that sets out principles for fair pay scales.	
	GPI has a reward policy and a salary grades matrix is shared On the intranet. These are based on a methodology that is explained in the report and that includes three key characteristics.	
	The report presents a table with the number of women and men in each grade. Caveats on the pay gap calculation are explained and initiatives to close potential pay gaps are listed.	
	Top salaries of the International Executive Director and salary ranges of the Strategy and Management Team are shared.	
	While the Panel appreciates the information on the number of women and men in each grade provided in the report, it notes that the presentation is unclear. Based on the figures provided, it would appear that there is a gender pay gap. No information has been provided as to how Grenpeace intends to address this.	
	In addition, the Panel would have been interested in understanding whether minorities are also affected by a pay gap.	
G3	Ensuring privacy rights and protecting personal data	3



	<ul><li>GPI data systems conform with the EU's GDPR requirements. There are additional systems and procedures for specific data processes. These have been shared with the Panel.</li><li>A 'Data Governance Policy' (shared with the Panel) provides guidelines on ethical use of data. A <u>Privacy and cookies statement</u> is on the website.</li></ul>	
G4	Largest donors and their contributions	3
	Greenpeace's funding comes from individual contributors and private foundation grants. The five largest donors in 2019 and their contributions are shared. For 2020, only three out of the five donors' amounts are shared.	
	The report also describes how GPI and NROs distribute funding across the network. A 'Policy on Third Party Relationships' (shared with the Panel) ensures independence and prevents unfair influence.	
Clu	ster C: Organisational Effectiveness	
	aff and volunteers are enabled to do their best	
	aff and volunteers are enabled to do their best Recruitment and employment is fair and transparent	3
H. St	aff and volunteers are enabled to do their bestRecruitment and employment is fair and transparentThe report refers to the 'Talent Acquisition Project' (related documentation was shared with the Panel) as a major effort to ensure the implementation of good recruitment practices. The project includes the production of guidelines and tools for recruitment, and links to diversity & inclusion work efforts.	3
H. St	Recruitment and employment is fair and transparentThe report refers to the 'Talent Acquisition Project' (related documentation was shared with the Panel) as a major effort to ensure the implementation of good recruitment practices. The project includes the production of guidelines and tools for recruitment, and links to	3
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	departments within GPI to ensure induction and mandatory training incorporate the latest developments in areas such as Integrity & Respect.	
	The report describes the Performance Management platform -CoFFee-, which allows and promotes exchange of open feedback, and the overall approach.	
	Two learning platforms, one for staff and the other for volunteers and other external stakeholders, are in place.	
H3	Safe working environment	3
	A model Code of Conduct has been uploaded to a <u>dedicated</u> <u>webpage</u> , which also provides access to the <u>Integrity System description</u> .	
	GPI's measures to ensure a safe working environment are listed, including Integrity & Respect training.	
	The different channels to raise a complaint are described and the step by step process of reporting and investigation are documented.	
	Progress from several NROs in this area are shared, including the support from some NROs to investigations in different NROs.	
I. Res	ources are handled effectively for the public good	
1	Resources are acquired in line with your values, globally accepted standards and without compromising independence	3
	Greenpeace does not accept money from governments, corporations, or companies – this is a Fundamental Principle laid out in GPI's License Agreement with each NRO. The GPI's Major Gift & Foundation Cross-border Fundraising Principles (shared with the Panel) guide NROs to ensure that donations that could compromise the organisation's independence, aims, or integrity are accepted.	
	The Panel would have been interested to know what processes are in place to ensure compliance with these policies at national level and whether there is a particular process or set of questions to determine whether donations will or will not be accepted?	
12	Monitoring of progress and re-allocation of resources	3
	The report outlines how GPI and NROs have coordinated programmatic adaptation to the Covid-19 context, through guidance, learning exchanges and a response plan. The report also shares some of the most	



	working remotely, and an enhancement of the duty of care. These numerous shifts, resulted in re-allocation of resources and investments, including technological tools, insurances, and in fundraising.	
	GPI mobilised its Strategic Finance Committee and its Finance team to work on the response plan, assessing risks and monitoring fundraising among others.	
	The report states that in spite of the challenges the income grew 8% from the previous year (2019).	
13	Minimising risk of corruption, bribery and misuse of funds	3
	It is stated that Greenpeace has strict policies on Avoiding Corruption, Financial Responsibility, and Impartiality and Conflict of Interests (shared with the Panel). Not all NROs have fully implemented the policies yet, but the intent is to create a consistent system and understanding of acceptable behaviour across the movement.	
	GPI has a Delegation of Financial Authority Policy that provides the GPI Board with oversight and control. The 'Model Protocol for Handling Suspected Integrity Violations' guides investigation of breaches in this area.	
	Training and induction in these policies is in place, and in addition to external audits, Greenpeace has an Internal Audit function.	
J. Go	overnance processes maximise accountability	
J1	Governance structure and recruitment of trustees/board members	3
	The report provides comprehensive descriptions of the governance bodies and management teams, including supporting committees. The Council is composed of Trustees from the NROs, who are elected by the NROs' Boards. The GPI Board members' remuneration is shared.	
	It is explained that each NRO is a separate legal entity with its own Board. The report also links to webpages and documentation where additional information can be found.	



	also like to have understood a little more as to the rationale for why a compensatory attendance fee for board members would be needed.	
J2	Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes	3
	The responsibilities of the GPI Board with regard to strategy and policy are listed, including the approval of the strategy and operating policies.	
	The Board meetings' frequency and how the outcomes are shared is explained. Some examples of approvals by the Board are shared.	
	The Board's role in managing risks is also shared. There is a Board Audit Committee which provides guidance on risk appetite and mitigation.	
J3	Complaints handling mechanisms and overview of complaints (external)	2
	GPI is still in the process of regulating how to implement its External Complaints Policy. In spite of this, it is mentioned that NROs and GPI are reachable through multiple channels and the organisation is committed to responding to issues and complaints. There is no central database of external complaints.	
	The Panel notes that Greenpeace has not yet implemented an external complaints policy, an issue which the Panel has been raising since 2017. The Panel is also notes that whistleblowing, complaints and prevention of sexual exploitation policies do not appear to be publicly available.	
J4	Complaints handling mechanisms and overview of complaints (internal)	3
	The Integrity System is operationalised through the development of Integrity Functions at GPI and NROs. The model Protocol on Handling Integrity Violations (shared with the Panel) outlines the process for reporting, investigations and sanctions for violations. On pages 33 and 34 the channels for staff to raise complaints are described.	
	An overview of the complaints categorised by type is provided along the outcomes.	
	The report also shares lessons learnt and future work in this area. The Panel commends Greenpeace for sharing insights from its experience as some of them might be found useful by other CSOs.	
J5	Protecting confidentiality and anonymity of those involved in complaints	2



	GPI's Integrity Unit seeks to balance the need for confidentiality and transparency during and after investigation of complaints. Confidentiality is seen as a right and an obligation for all parties involved, and as vital for the creation of a safe space in which people feel comfortable raising concerns.	
	The report states that people have the right to report concerns anonymously, but that this can make it more difficult to take action. Staff can make anonymous submissions to the Integrity Officer, and the whistleblower procedure also allows anonymous reporting directly to the Board.	
K. Lee	adership is dedicated to fulfilling the 12 Commitments	
K1	The governing body and management are held accountable for fulfilling strategic promises	3
	GPI Board is responsible for overseeing the International Executive Directors and ensuring that they implement Council and Board decisions, according to the <u>Rules of Procedure</u> . The elements that external evaluators look at during the annual evaluation are listed in the report.	
	360 degrees interviews are conducted by the GPI Board to assess the performance of the IED annually.	
	The Panel would have liked to learn whether the work of the Board is also evaluated and what systems are in place to handle any complaints against Board members.	
К2	Inclusion of staff in discussing progress toward organisational accountability	3
	The report emphasises how organisational accountability is a key topic covered in several management and leadership learning programmes. The report states that performance reviews are used to hold each other accountable within the organization by cultivating an open feedback culture.	
	Staff at different levels are involved in the production of the accountability report, and feedback on it is shared with relevant stakeholders.	
	The report highlights the involvement of Greenpeace in Accountable Now's CoPs and Board.	



К3	Scope of this accountability report and influence over national entities	3
	The report's scope is explained, while it covers the entire Greenpeace global network, including GPI and the NROs, all are separate legal entities. All members of the network are mutually accountable to one another. Shared processes and commitments that support the cohesiveness of the network are listed, including key global model policies and peer to peer support and sharing among NROs.	