



**Accountable
Now**

GLOBAL STANDARDS LOCAL TRUST



Plan International Independent Review Panel Feedback

Accountability Report 2020-21
Review Round March 2022

Accountable Now · www.accountablenow.org ·

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Plan International Feedback from the Independent Review Panel

Review Round March 2022

28th March 2022

Dear Stephen Omollo,

Thank you for your accountability report submitted by your predecessor in the role, Raj Nooyi. 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.

This interim report addresses the Panel's previous [feedback letter](#) on the selected areas covered in this report. The responses built upon the [previous report](#), and thus providing a comprehensive response backed up with examples and evidence of results and continued progress to being a leading organisation in terms of widely entrenched accountability practices.

The report clearly demonstrates that Plan International continues to embed the accountability commitments, especially in the following reporting questions: key strategic indicators of success (A2); expertise being recognised and welcomed by peers and stakeholders (C2); evidence regarding the root causes of the problems (F1); staff development (H2); minimising risk of corruption, bribery and misuse of funds (I3); and inclusion of staff in discussing progress toward organisational accountability (K2). Overall, the Panel found this interim report to be clear, straightforward, easy to follow, and consistently providing evidence to support the implementation of accountability practices. These are all considered strengths in the report.

Areas for improvement are flagged in the following questions: resources are acquired in line with your values, globally accepted standards and without compromising independence (I1), where information in regards to board accountability and human resources training and development haven't been shared; and the governing body and management are held accountable for fulfilling strategic promises (K1). While The IRP acknowledges that some information might be considered as confidential, some answers can be addressed without compromising confidentiality.

The scoring provided by the Panel should be considered as a reflection of the information provided in both, this and the previous report combined.



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





Plan International's Accountability Report 2020-21

Review Round March 2022

Opening Statement from the Head of Organisation

The opening statement by Plan International's Interim Chief Executive Officer, Raj Nooyi, emphasises the integration of the organisational values including 'We are open and accountable' in everything the organisation does. The Panel notes that the CEO transition that took place between this and the previous report will inevitably influence Plan's efforts. The statement also highlights how the Accountable Now reporting allows Plan International to reflect on its work and progress from an accountability perspective.

The statement also outlines Plan International priorities, including the following:

- The restructure of the Global Hub Operations to be more service oriented.
- The improvement of performance management frameworks and embedding MERL across different functions.
- The realisation of an equitable, diverse and inclusive workplace.

Lastly, the statement recognises the effort and commitment of Plan International teams to advance children rights and equality for girls.

Cluster A: Impact Achieved

A. The impact we achieve

A2 **Key strategic indicators for success**

The report provides as Annexes (A1 and A2) the results of the organisation's achievements against its 5 years targets and strategic priorities as suggested by the Panel feedback. The results are published [online](#) and have been used to inform the next global strategy. The information provided allows comprehensive and complete information on how the information gathered is used and contributes to accountability to those PI serves. The Panel commends Plan for presenting such progress reports in both comprehensive (Annex A1) and easily digestible (Annex A2) formats.

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C. We lead by example



C2	<p>Expertise is recognised and welcomed by peers and stakeholders</p> <p>The report provides examples of feedback/engagement from peers and stakeholders, (beyond partners and communities, which were provided in the previous report) indicating that the organisation's expertise is recognised. In relation with Humanitarian work, examples of leadership and participation in working groups, alliances and research are shared. Successes on advocacy work and three items of published research are shared. The information provided is exhaustive and reflects how 'PI contributions' are welcomed by peers and stakeholders, and used for greater impact. Given the discrepancy between the unprecedented global press coverage from the #FreeToBeOnline Campaign, and the somewhat limited number of research report downloads, the Panel encourages Plan to consider how future research reports might gain more coverage perhaps through accompanying or related online campaigns.</p>	4
C5	<p>Responsible stewardship for the environment</p> <p>The report states that office-level Environmental Action Plans outline measures for reducing organisational environmental footprint, and are tailored to the diverse contexts, led by Green Teams. The implementation of the plans are not yet consistent and therefore a Global Environmental Policy (which was also mentioned in the previous report) to set alignment is still being developed, due for summer 2022. Several offices consider their programmatic environmental impact. 'Plan International Environmental Assessment Tool' was tested and will be rolled out in 2022 to integrate environmental impact into projects.</p> <p>The report also provides information on where lessons learnt are shared, and examples of educational initiatives for the general public, staff and volunteers.</p> <p>Examples of engagement with other actors to advance gender equality and climate justice are shared. PII's approach to greater environmental stewardship (on sites in country offices and on programs) should allow a comprehensive oversight on its environmental impact. The Panel looks forward to read how this approach moved from project to systematic global policy in the next report)</p>	3
Cluster B: Stakeholder Involvement		
F. Our advocacy work addresses the root cause of problems		
F1	<p>Evidence regarding the root causes of the problems you address</p> <p>The report outlines progress and results on advocacy work in a wide range of areas including protection from violence, education, and health. An</p>	4



	<p>annex (A3) providing clear, consistent, global definitions and methodology for assessing significance, including markers of "significant progress," is provided.</p> <p>The previous (2019-20) full report mentioned a new Global Advocacy Strategy. How does that strategy link to the data provided in this response?</p> <p>The report also provides examples of advocacy work at global level. The information provided completes adequately the previous report and demonstrates how PI ensures that all its entities have a common understanding and approach to the mission.</p>	
F2	<p>Stakeholders support your advocacy work and value changes achieved</p> <p>The report provides three examples to illustrate how the participatory approach to advocacy described in the previous report works in practice.</p> <p>The first example is an outline of the 'Girls Get Equal' global campaign successes, including 22,600 signed petitions or open letters supporting the campaign. Further information is provided in Annex A4.</p> <p>The Equal Measures 2030 partnership, whose secretariat is hosted by Plan International, is presented. It works towards gender equality by ensuring data is accessible for advocate actors to work in partnership.</p> <p>The third example refers to Joining Forces and its rights based approach and its principles of participation, inclusion and non-discrimination. Recent examples of advocacy outputs are shared, including the open letter from Children 'We need safe schools in the Sahel Now!'.</p> <p>Those examples demonstrate how girls are contributing to PI's advocacy work and how this contribution is used and supported with others. This adequately completes the information provided in the previous report.</p>	3
<p>G. We are transparent, invite dialogue and protect stakeholders' safety</p>		
G3	<p>Ensuring privacy rights and protecting personal data</p> <p>The internal newsletter shared as annex (A5) illustrates how staff is made aware of policies, processes and guidelines relating to privacy rights. The report also outlines data privacy training uptake and process.</p>	3



	The Panel invites PI to continue to provide results of how many staff have actually attended training and refreshing courses in the next report (and any feedback from staff on such trainings and resources, if possible).	
G4	<p>Largest donors and their contributions</p> <p>The five largest donors and their contributions are provided.</p> <p>The report explains that Plan International is funded through the National Organisations, which have their own policies governing anonymous contributions. The Panel would benefit from seeing an example of one such policy, or slightly further elaboration on this point.</p> <p>The Panel appreciates the information about the National Organisations having their own policies. If not in place already, another layer of safeguard and guidance for National Organisations, such as a global policy, could be explored.</p>	3
<h2>Cluster C: Organisational Effectiveness</h2>		
<h3>H. Staff and volunteers are enabled to do their best</h3>		
H1	<p>Recruitment and employment is fair and transparent</p> <p>The Talent Acquisition Policy, applicable across PI, has been shared in annex 6. It requires fair and competitive recruitment processes based on merit. Specific guidance for hiring managers addresses awareness of bias and setting up diverse interview panels.</p> <p>The report outlines initiatives on anti-racism, equity, diversity and inclusion, which includes actions to strengthen fairness and transparency in recruitment processes. The Panel is pleased to see more detailed explanation of the Anti-Racism Principles and Roadmap here, which were initially mentioned in the Letter from the CEO for the Previous Report.</p> <p>In annex A7, a breakdown of the organisation's staff by gender, years in the organisation and age is provided. However, as the information in the annex is partially erased, it does not allow proper analysis by the Panel on how policies are actually allowing achieving its intended outcome, i.e. equity, diversity and inclusion.</p> <p>The whole response allows understanding how PI is approaching fair recruitment and employment. The Panel recommends to include, in the next report, more specific data on gender disaggregated by rank for</p>	3



	example, or seniority, etc. An example on how this is reported by other members can be found in Restless Development report (pp.21) .	
H2	<p>Staff development</p> <p>The report provides information on staff online training uptake on a diverse range of themes - the Previous Report mentioning over 400 training courses available to staff (in Plan Academy), and this Interim Report mentioning 52,000 courses completed during this reporting period. The courses are available in four languages. The Performance Appraisal process is described and the principles that underpinned it, are listed. The report helpfully provides a flow chart illustrating the process. Moreover a 'guidance on using the values and behaviours in annual appraisal' is shared as annex (A8).</p> <p>In the next report, the Panel recommends to share if there is any feedback mechanism in place for staff to assess this framework (ie. training, the Performance Appraisal, etc.) and its impact on staff development, and how PI ensures that the feedback is taken onboard.</p>	4
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>A <i>Corporate Partnerships Ethical Engagement Policy</i>, developed in 2015, is shared as annex A9, where it is possible to understand how the policy works and what industries are excluded and considered high risk.</p> <p>The Panel recommends that in the next report, PI provides information on how this policy is being embedded by PI entities (staff training, what mechanisms are in place in case of breach of this policy, etc). This information will allow better understanding of how PI ensures that this policy is effective and adapted over time, as needed.</p>	2
I3	<p>Minimising risk of corruption, bribery and misuse of funds</p> <p>The Panel commends PI's continued practice of making Counter-Fraud reports and information publicly available on its website (and stated in its previous full report). As suggested by the Panel, the report provides information around staff sensitisation and training. Country offices conduct a self-assessment, in which staff training is considered. Management action plans (annex A10) are put in place when the self-assessment scores less than 65%.</p>	4



	The organisational core management standards, which are included in sensitisation, are shared. The Panel is left wondering about the frequency of fraud risk analysis, which is mentioned in the previous report. Besides this, the information provided here is completing the answer of the previous report.	
J. Governance processes maximise accountability		
J5	<p>Protecting confidentiality and anonymity of those involved in complaints</p> <p>The report provides comprehensive information about the Safecall mechanism and what options are available to whistleblowers depending on their preferred level of anonymity. The report also outlines how whistleblowing is made accessible and encouraged.</p> <p>The Panel notes very positively that concerns submitted in writing format, can be done in any language.</p> <p>The response discusses disclosure options for whistleblowers themselves but does not address if any situations arise when PI leadership/staff need to decide for themselves if/to what extent to keep a complaint anonymous.</p>	3
K. Leadership is dedicated to fulfilling the 12 Commitments		
K1	<p>The governing body and management are held accountable for fulfilling strategic promises</p> <p>In the previous feedback letter, the Panel suggested providing information on the results of the self-assessment and examples of actions taken informed by the reports mentioned. The report explains that the International Board self-assessment and examples of actions taken cannot be shared, since the self-assessment results are confidential. The International Board however discussed these in their closed session.</p> <p>The Panel understands the rationale for this information to be confidential , however encourages PI further reflection on how to selectively disclose further information, to enhance this accountability practice.</p> <p>At the same time, the Panel commends the practice (mentioned in the last report) of the board delivering an annual report to the Members Assembly. -</p>	2
K2	Inclusion of staff in discussing progress toward organisational accountability	4



	<p>The response describes how staff (and youth and other actors) was involved in a Global Strategy Update (GLOSUP) during the reporting period.</p> <p>The Panel appreciates this example on how staff was involved in strategic decision-making and in defining priorities, and congratulates Plan on the impressive level of internal engagement (ex: 8,700 responses to all-staff engagement activities, etc).</p>	
K3	<p>Scope of this accountability report and influence over national entities</p> <p>Building on the previous report's mention of 8 Global policies, this interim report response now provides an outline of the procedure in case that audits indicate non-compliance with the global policies. The procedure includes recommendations, follow ups, and management action plans. Details on the number of National Organisations audited and on the policies covered are provided.</p>	4