Transparency International
Independent Review Panel Feedback

Accountability Report 2021
Review Round February 2023

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3rd March 2023

Dear Daniel Eriksson,

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 assessment below.

Overall, the Panel found this to be a well-written report which provides a lot of useful evidence about the organisational commitment to accountability. There appears to be dedication towards learning within the organisation. The Panel welcomes practices such as publishing external evaluation reports online and furthermore considers the Impact Monitoring Approach a **good practice**.

The Panel found the following areas to be of particular strength: Mission statements and theory of change (A1), evidence base for advocacy (F1), transparency on donations (G5). Additionally, the Panel finds the organisation's research work impressive, with highly authoritative reports underpinning its advocacy efforts.

The following areas are flagged for further improvement: inclusion and protection of human rights (C3), identification and engagement of stakeholders (D1 and D2), maximising coordination with others (D3), and providing evidence that recruitment and employment is fair and transparent (H1). Generally, the Panel finds that greater clarifications on the stakeholders that the TI-S is working with would strengthen responses. Furthermore, the Panel notes that areas such as external and internal complaints handling (J3 & J4) have recently seen introductions of new policies and looks forward to learning more about the results.

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 via the Accountable Now Secretariat.

Yours sincerely,

Accountable Now's Independent Review Panel

Accountable Now
Independent Review Panel

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Opening Statement from the Head of Organisation

The opening statement from the Executive Director highlights that 2021 represents a fresh start for the organisation and outlines their achievements in the past year; these include Transparency International's (TI) first Movement Summit, strengthening calls to end the exploitation of secretive corporate structures, and advocacy actions that led to critical anti-corruption measures in the IMF's emergency COVID-19 loans.

The statement shares that 2021 is also the start of TI's 10-year strategy, Holding Power to Account, which "provides a roadmap to a fairer and more equitable 2030", affirming their commitments to the Sustainable Development Goals. It further recommits the organisation to accountability, ensuring that those in power are held to account.

The Panel notes positively TI's work in the past year. The Panel welcomes its recommitment to the accountability reporting process, with this report representing a refresh for the organisation.

Cluster A: What We Want to Achieve

A. The Impact We Achieve

A1	***What are your mission statements and your theory of change? Please provide a brief overview.***	*4*
	The report lays out a clear mission statement and vision for the organisation.	
	TI's 10 year strategy (Holding Power to Account 2021-2030) is linked and explained, with a clear implementation plan for how the TI-Secretariat (TI-S) can take action upon these goals.	
	The organisation's Impact Monitoring Approach lays out the areas of change and pathways for achievements. It is well noted that translations to multiple languages are available on TI's website for key documents such as the strategy (English, French, Spanish and Arabic) and the guiding document on how to apply the	

	Impact Monitoring Approach (English, French, Spanish and Russian). The Panel finds the Impact Monitoring Approach to be a **good practice**.	

	A2	**What are your key strategic indicators for success and how do you involve your stakeholders in developing them?**	3

As mentioned above, the next two years 2021-2022 their work will be guided by the two-year TI-S Implementation Plan which bridges into action the overarching 10-year strategic plan.

A table is provided with strategy areas and some outcome indicators. The report states that indicators have been developed with the people that are responsible for and contribute to implementing the work through community discussions and consultations within the TI-S.

It is positively noted that the development process included stakeholders within TI-S. Even though the scope of the report and the strategic indicators are focused on only the TI Secretariat (TI-S), the Panel would like to further understand if consultations for these indicators included other types of stakeholders such as partners, civil society actors and TI's national chapters as well.

The report also provides information about how performance is measured against the indicators, referring to the Impact Monitoring Approach above. The Panel looks forward to seeing further updates regarding the changes achieved with this new strategy and to reading more about results against those indicators in the next report.

Potential recommendations include ensuring that these types of documents are more accessible in terms of being in simple language and making them more visual to ensure comprehension across different types of audience.

A3	**What progress has been achieved and difficulties encountered against these indicators over the reporting period?**	3

The report provides key progress achieved against each of the six strategy areas and indicators already outlined in the previous section. The Panel notes positively the achievements made throughout this reporting period.

Other achievements included in the report are TI's research being referenced widely, the consultations held for the Global Corruption Barometer, the provision of legal services/support to victims of corruption, and internally, the organisation's ability to adapt to new ways of working and the TI Movement Summit.

Some challenges are also highlighted. For future reports, it would also be good to learn about some of the challenges that relate more directly to the achievement

	of the indicators. Additionally, it would also be good to understand if TI-S's stakeholders share the same sentiments regarding achievements and challenges.	
A4	***Have there been significant events or changes in your organisation or your sector over the reporting period of relevance to governance and accountability?*** A set of significant changes relating to governance and accountability is included: digital adaptations to COVID, the TI Movement Summit, the establishment of the International Council (a body of experts that support TI's activities - <u>further details</u>), and the appointment of a new Board member. On the aforementioned items, it would also be good to learn more about how these actions affected the accountability processes (if any?), and how the organisation will monitor and track the impact of these changes on accountability over time. Additionally, the Panel would like to know what role the International Council may play within TI's accountability processes in its advisory capacity.	3

B. Positive Results Are Sustained

B1	***What have you done to ensure sustainability of your work beyond the project cycle, as per commitment 4? Is there evidence of success?*** The report explains how the organisation's work in terms of advocacy is aimed at policy reforms, and therefore has a long lasting impact beyond project cycles. Other examples point towards how TI's research serves as evidence and key information points long after the cycle closes. The Panel also welcomes the fact that TI makes its knowledge products available to the public, as doing so enhances the inclusivity and accessibility of knowledge and research. In particular, it appreciates the practice whereby community workshops are held on the right to information following which the communities are supported with the filing of complaints. The response in E4 further states that TI carries out impact evaluations of the policy reforms that it has achieved a couple years after the reforms went into effect as this would be a valuable way to understand long-term sustainability and impact. Additionally, the Panel would appreciate further information regarding how the organisation approaches embedding sustainability within the organisation's advocacy efforts from beginning to end, for example if policies are available to guide advocacy actions.	3

B2	***What lessons have been learned in this period? How have the lessons been transparently shared among internal and external stakeholders? How do you plan to use these lessons to improve your work in the future?***	**3**
	The Panel welcomes the organisation's transparency in terms of carrying out regular evaluations and publishing them online.	
	The report states that TI holds knowledge sharing events that allow colleagues to learn and ask questions, that the lessons learned inform future proposals and that national chapters are responsible for further discussions of the lessons learned. Some key learnings alongside challenges are extracted and presented, along with potential pathways for resolving them.	
	The Panel would like to know more about the organisation's overall approach to learning, and if it has a systematic mechanism or other functions that ensure lessons learned are used to inform later work? If not, it may be interesting to look at Educo's approach to learning where learning is tracked, reflected on and capitalised on (2020 report, pg. 13).	

C. We Lead By Example

C1	***How does your organisation demonstrate excellence on your strategic priorities?***	**3**
	The response outlines TI's participation and input to stakeholders in the Financial Action Task Force and the UN Conventions on Anti-Corruption, noting that these inputs have been well valued.	
	The opening statement and responses to A3 also showcase the organisation's achievements through its inputs provided to the IMF.	
C2	***What evidence is there that your expertise is recognised and welcomed by your peers, partners and other stakeholders?***	**3**
	In terms of recognition, the response states that its flagship products such as the Corruption Performance Index or the Global Corruption Barometer are both valued by the media and academics. Additionally, the TI Helpdesk Service (an on demand research service) received high ratings from end users.	
	Other recognition includes validation through the interaction frequency with TI online presence. While such sophisticated methods of tracking media presence is impressive, the Panel would appreciate further information about how other types of civil society organisations, actors, multilaterals, etc have welcomed the organisation's expertise.	

C3	***How does your organisation practice being inclusive and protecting human rights, including promoting women's rights and gender equality, in accordance with commitments 1-2?***	**2**
	The response provides a set of policies that facilitates the organisation's approach to diversity and inclusion. Beyond this, TI's new strategy 2030 commits the organisation to be inclusive and intersectional in all that they do.	
	Internally, the TI Secretariat has a Gender and Diversity Policy and regularly consults its staff on diversity. The policy appears dated, and we would recommend that it be updated to reflect the learning and the current best practices. There is also a full time Integrity Manager. The Panel notes positively the role of Integrity Manager, and provides further comments later in this feedback letter.	
	A set of examples from different areas of work is highlighted, some notable work includes their advocacy for sextortion as a form of corruption, the work alongside multilateral institutions on gendered anti-corruption, and the research on the linkages between corruption and different forms of discrimination.	
	The Panel finds TI's programmatic work on advancing gender equality commendable. However, the Panel would like to further understand how the organisation works to protect human rights more broadly, and seeks input from those at risk of discrimination (gendered or otherwise) to inform their work. Lastly, has the organisation encountered any difficulties in doing so? What are some of the challenges and potential plans to overcome them?	
C4	***How do you minimise your organisation's negative impacts on your stakeholders, especially partners and the people you work for? How does your organisation protect those most susceptible to harassment, abuse, exploitation, or any other type of unacceptable conduct?***	**2**
	TI undertakes risk assessments for all their programmes at the fundraising stage. This is a good approach, however we would encourage for these to be co-created alongside partners and communities whenever possible.	
	Furthermore, it is well noted that the organisation has a dedicated function (SAFE) to manage risks and security across the movement. There is also a Rapid Response Unit in place to protect staff, TI Movement and stakeholders from different types of threats.	
	Internally, policies are in place for safeguarding and against unacceptable conduct; channels are available for reporting across the movement. Requirements	

	for safeguarding and conduct are set for TI chapters prior to affiliation, including indicators for effective implementation. A set of examples of how those policies have been activated and outcomes of the process would have enabled the Panel to better understand how they work in practice and their efficiency in protecting those susceptible to abuse.	
C5	***How do you demonstrate responsible stewardship for the environment?*** TI's new 2030 Strategy incorporates climate and environment consciousness concerns as a priority for the organisation. Internally, the TIGRE task force is responsible for environmental reporting across the TI-Secretariat; it also measures TI's carbon emission and sets reduction goals. Changes have also been made to the Berlin head office to lower consumption. The Sustainable Travel Policy also guides business travel, however the conditions of environmental impact for travel is not explained within the policy. Perhaps providing the Panel with the Sustainability Travel Manual may enable further review. The TI-S also collaborates with Planetly to produce reports on its environmental impact, including carbon footprint. The Panel finds these practices commendable and would like to know if the organisation has a procurement policy in place that takes into account and assesses environmental impacts. A resource that we'd also like to recommend is the recent [cheat sheet](#) from AN and MIO ESCDE on environmental considerations.	3

Cluster B: Stakeholder Involvement

D. Key stakeholders are identified with great care

D1	***Please list your key stakeholders. What process do you use to identify them?*** An overview of stakeholders from a higher level is provided, although TI has stated that it does not have a systemic way of identifying stakeholders. Within TI, each project carries out stakeholder analysis through their own process. For the Panel to provide the most useful feedback in the next round, it would be good to understand these approaches, perhaps the organisation can provide a sample of 1-2 projects and their approach to stakeholder identification and analysis, as well as TI's understanding of stakeholders, as opposed to other actors.	2

	It would also be good to understand that if stakeholders' inputs enable the identification of further stakeholders; i.e if experts within the TI networks support the identification of other experts.	9
D2	*How do you ensure you reach out to those who are impacted or concerned by your work?* At a higher level, the report stated that there is currently no standardised process but that participation is highly encouraged. The Panel would suggest that in the next report, TI provides some examples of how different projects have reached out to the various stakeholders concerned, and what impact will the new Strategy 2030 have on further engaging those who are impacted. Specifically, the Panel would also like to receive information about processes and examples of how TI reaches out to communities impacted by its work. TI's Advocacy and Legal Advice Centres (ALACs) provide people affected by corruption the opportunity to inform the focus of the organisation's work. The Panel noted positively that under TI's Impact Monitoring Approach, findings and impact claims need to be validated by external stakeholders. However, without examples to illustrate how this works in practice, further feedback cannot be given at this stage. The Panel wonders if a general set of guidelines may be useful to embed stakeholder engagement throughout TI's interventions. Potentially, Amnesty International's work in assessing the extent to which rights holders actively participate in their work can provide an interesting starting point (see their 2020 report, pg 12).	2
D3	*How, specifically, do you maximise coordination with others operating in the same sectoral and geographic space with special reference to national and local actors?* The response states that most TI chapters work with community based organisations or national NGOs who are working on overlapping issues. The TI-S also works with partners in places where no national chapters are available. Here, the Panel would like to learn if there is a policy in place for identifying partners and guiding works in partnership for the TI Secretariat. Additionally, it would be good to understand how these partnerships play out, and to what extent TI-S supports the current ongoing work of its partners.	1

	In particular, the Panel would appreciate details about how the TI Secretariat works with others in the same space and sector to maximise impact together.	

E. We listen to, involve and empower stakeholders

E1	***What avenues do you provide your stakeholders to provide feedback to you? What evidence demonstrates that key stakeholder groups acknowledge your organisation is good at listening and acting upon what you heard?*** The response outlines how different stakeholders were involved in the Vision 2030 process and the development of TI's strategy. From the response in E2 below, the Panel notes that multiple channels are available to staff within the Berlin office to provide their inputs, including through a staff survey carried out in 2020. While the efforts to engage different stakeholders into the strategy development process is commendable, the Panel would like to further learn about how TI-S actively and consistently seek feedback and inputs from constituents at programmatic levels. Potentially, the example from Restless Development ([2020 report](#), pg. 16) may be useful. Furthermore, it would be good to understand the next steps that the organisation carries out after feedback is sought. How does the organisation respond to the external input that it received?	**2**
E2	***What evidence confirms a high level of stakeholder engagement in your activities and decisions from beginning to end?*** The report provides a description as to how various stakeholders are engaged in its work. For internal processes, is there any plan to document the coordination processes between key internal stakeholders? This type of exercise can be a learning opportunity for TI. An example from the Land and Corruption Project (Phase II) showcases how the organisation engages with "sentinel communities" to gain insights on the issues that affect the communities. However, it would be good to understand further a key example of how the project has course-corrected due to communities' insights (if it did), and what impact did it have. As mentioned above in E1, the Panel finds TI's work in engaging various stakeholders in its strategy positive. Additionally, as mentioned in D2, the organisation's Impact Monitoring Approach also requires stakeholders to validate its impact claims.	**2**
E3	***Main likes/dislikes from stakeholders and organisation's response***	**2**

	The response provides feedback from the Strategy development process, alongside how the organisation has responded to the issues raised. This is a very commendable practice, and we hope that this continues in future refreshes. While the report also mentions that the organisation collects feedback from staff and key stakeholders of projects - as the Panel has requested in E1, it would also be good to provide the types of channels available to solicit feedback at the programmatic level, alongside a sample of those received and how the organisation has reacted (or if not, why not). Similarly, if possible, the Panel would like to learn more about the internal feedback received through the work meetings or open comments and how the organisation reacted (this could be provided as a summary). This would enable the Panel to truly get a sense of how TI-S listens and closes the feedback loop, and be able to advise on further ways to improve.		
E4	*How do you know that people and partners you worked with have gained capacities, means, self-esteem or institutional strengths that last beyond your immediate intervention? (You may skip this question if you have addressed it in your response to B. 1)* The accreditation process is outlined, which the report states supports National Chapters to improve their capacities. MEL training for NCs are said to have been occasionally followed up with evaluations to see how they've been implemented. Here the Panel suggests a more systematic approach to supporting National Chapters, especially since there is already an accreditation process in place; perhaps evaluations can help identify areas the NCs are doing well in, and those where further support may be needed. At the project level, the Impact Monitoring Approach is a good systematic approach to understand the impact that the organisation may have in terms of policy and institutional changes. The Action Grant Final Evaluation - available on their website - provides some feedback from external stakeholders on TI's work alongside the examples from the ALACs. Additionally, it would be good to know if the organisation has a clear approach to working in partnership, that emphasises supporting and building partners' capacities and how TI collects information on its effectiveness. Beyond the process outlined, it would be useful to provide examples of the feedback received from peoples and partners whom TI-S has worked with.	*2*	
	F. Our advocacy work addresses the root causes of problems		

F1	*How do you identify and gather evidence regarding the root causes of the problems you address and use this to support your advocacy positions?*	4

TI's flagship tools such as the Corruption Perception Indicators and the Global Corruption Barometer, alongside country level assessments and other tools go to inform their advocacy work. Through the examples provided, the Panel is satisfied that the organisation carries out contextual analysis and ongoing research to inform advocacy.

Stakeholders' inputs are also factored in as the research methodology for the CPI and the GCB both consider inputs from national level analysis and public perception.

F2	*How do you ensure that the people you work for support your advocacy work and value the changes achieved by this advocacy?*	2

The report states that TI uses various tools to seek support from the people whose lives are impacted by corruption, however it does not mention these specific tools. The Panel would encourage the organisation to discuss and share some of these tools (if there are no limitations to doing so).

However, it would still be good to know how other types of stakeholders beyond governments (especially communities and those already within the TI movement) affect TI's advocacy work. While the Panel notes positively that the organisation starts from a very strong evidence base as shown in F1, and has an approach to validate impact with stakeholders, the Panel cannot assess the extent to which the TI-S works with communities affected by corruption and gains their support for its work at the beginning of and during interventions.

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

G1	*Are your annual budgets, policies (especially regarding complaints, governance, staffing/salaries and operations), evaluations, top executive remuneration and vital statistics about the organisation (including number of offices and number of staff/volunteers/partners) easily available on your website in languages accessible by affected key stakeholders? Please provide links, highlight membership in initiatives such as IATI and outline offline efforts to promote transparency.*	3

Transparency International's website provides all necessary information regarding their annual budgets, policies, evaluations, top executive remuneration (included in pg.44 of 2021 financial audit). Exemplary here is the inclusion of the funding that goes to partner organisations.

The response also states that TI is a member of IATI and Initiative Transparente Zivilgesellschaft (German initiative on civil society transparency).

		While information regarding national chapters is easily accessible, the Panel would like to request further information regarding TI-S's overall partners.	
		Additionally, it would be good to understand if this information is available in other languages, and if there are efforts made by the organisation to further disseminate this type of information more widely amongst stakeholders.	
	G2	***What policies do you have in place to ensure a fair pay scale? Do you measure the gender pay gap in your organisation, and if so what is it? What are the salaries of the five most senior positions in the organisation, and what is the ratio between the top and bottom salaries? If this information cannot be provided or is confidential, please explain why.***	**2**
		TI's response provides the monthly gross salaries of the five highest earners. While no ratio between top and bottom salaries is provided, the highest and lowest averages of monthly salaries were included.	
		The response further states that there is no differentiation between pay scale for locally vs internationally hired staff within the TI-S.	
		However, it would be good to provide further details regarding TI's policies and approach to determining these pay scales (perhaps a policy exists that can be linked or shared privately with the Panel). Additionally, it would be good to see further information about the gender and race pay gap, if such information can be legally tracked and disclosed. Measuring these would enable wide understanding across the organisation and improve diversity and inclusion.	
	G3	***How do you ensure privacy rights and protect personal data?***	**3**
		TI's privacy policy had undergone a revamping process to expand the scope of applicability. The response explains how people can request data erasure and the steps towards that.	
		It is noted that the organisation has a separate privacy policy for its donors and establishes data protection within work contracts with staff/supporters.	
		To go beyond the scope of the current framework and see how individuals and communities' privacy rights can be valued throughout different aspects of an organisation's work, we would like to recommend ChildFund Australia's work on informed consent.	
	G4	***Who are the five largest single donors and what is the monetary value of their contribution? Where private individual donors cannot be named due to requested***	*4*

anonymity, please explain what safeguards are in place to ensure that anonymous contributions do not have unfair influence on organisational activities.

The five largest donors are listed. The Donations Policy outlines how the org receives donations. The donations policy states that any donation over €1,000 must be disclosed in the annual audit, and this applies to both the Secretariat and any National Chapters.

Cluster C: What We Do Internally

H. Staff and volunteers are enabled to do their best

H1	*Provide evidence that recruitment and employment is fair and transparent.*	2
	The TI Recruitment Guidelines are provided. The guideline provides the structure and guidance on how recruitment processes should play out. There is a standard section that discusses equal opportunity and equal treatments of candidates. While the Guidelines provide a clear step-by-step instruction and statistics in terms of employee metrics is given within the Annex 1 (available at the end of the report), there is scope here to share and reflect further in terms of what are the imbalances within the organisation, especially in terms of gender ratio at leadership positions, racial diversity within the staff pool and other intersectional aspects; a more sophisticated diversification of metrics (potentially beyond binary gender and nationality, if possible) might be useful. It would also be good to learn more about the different efforts that take place within the organisation to promote diversity. Moreover, the Panel would be interested to know how staff are trained on the implementation of the Recruitment Guidelines and how TI ensures that its recruitment panels are diverse.	
H2	*What are you doing to invest in staff development? What indicators demonstrate your progress? What are your plans to improve?* The Learning and Development Policy is mentioned, however it is not available online and has not been shared with the Panel. A list of staff training sessions that were held in 2021 is provided. There is a good range within the opportunities provided, however it would be good to include the uptake of these opportunities, as well as any further target. The Panel would be interested in learning what the take up of the training has been and how effective it	2

	was. Moreover, the Panel would like to know if TI provides its staff with other professional development opportunities beyond training per se. Not only so, from response K1, we can tell that there is an annual review for all staff. It would therefore be good to include further details on how such processes play out within the organisation in this section as well. This would further support the answer in terms of how training needs are identified and how staff can provide further feedback to the organisation. A good example here can be drawn from Sightsavers, who worked with their staff to construct the 'Valuing Individual Performance' (VIP) system. The system enables managers to plan learning and development activities for their team and for individuals alongside an annual performance review ([Sightsavers' Accountability Report 2019](#), pg. 26).	
H3	***How does your organisation ensure a safe working environment for everybody, including one free of sexual harassment, abuse, exploitation or any other unacceptable conduct? What indicators demonstrate your progress? What are your plans to improve?*** The response shares a set of policies that the organisation has in place to ensure a safe working environment for everybody. Commendable here is the Integrity Violation reporting process whereby channels for anonymous reporting, a dedicated point of contact, and a clear outline of processes, are available. However, the Panel would suggest that access to reporting channels be more visible on the website. We note that the statistics from this year will provide a baseline and look forward to further discussion on this end in the next report. Has TI encountered any challenges so far in carrying out this line of work?	*2*

I. Resources are handled effectively for the public good

I1	***How do you acquire resources in line with your values and globally-accepted standards and without compromising your independence?*** The response provides a link for the Donations Policy. The policy indicates that the organisation has checks and balances in place that reviews donations as they come in, and provides simple guidance on what types of donation are acceptable. The response states that TI-S is currently undergoing a policy review on this end. We therefore look forward to hearing more about how this process plays out. A	*2*

	potentially useful resource from the AN membership is Restless Development's [Ethical Funding Policy]().	
I2	***How is progress continually monitored against strategic objectives, and resources re-allocated to optimise impact?*** The monitoring and reallocation processes for budgets/budget variance within the organisation is outlined. The response demonstrates the flexibility for larger budget reallocation through discussion between responsible executives, project managers and the relevant collegial bodies. Perhaps here, it would be good to understand the monthly budget review process. Who is reviewing? Is it the Board? How does this support flexibility in terms of reallocation?	**3**
I3	***How do you minimise the risk of corruption, bribery or misuse of funds? Which financial controls do you have in place? What do you do when controls fail? Describe relevant situations that occurred in this reporting period.*** The organisation's financial measures are controlled by a Financial Manual. The Manual is comprehensive, with clear guidelines in regards to prevention of misuse of funds and fraud, considerations to financial risks, alongside regulations around procurement and contracting. The organisation undergoes a yearly audit and a clear risk management structure in place. The Anti-Fraud policy (contained within the Financial Manual) outlines the steps for incident reporting, escalation and case management. The Integrity Manager also keeps record of incidents. Here, it would be good to understand if any cases of fraud have been reported in the past year, and if so what corrective actions had been taken? Training in terms of identifying fraud and corruption is provided to staff and partners. However, we would like to further know if there is any training in terms of the financial manual (or the varying policies contained within it) being provided to the relevant staff bodies? Without appropriate training, there might be a risk of having a policy that is not lived.	**3**

J. Governance processes maximise accountability

J1	***What is your governance structure and what policies/practices guide replacing and recruiting new trustees/board members?***	**3**

The governance structure of the organisation is provided. The process for selecting and recruiting new trustees and board members are also included. Trustees are elected by the members (who are 5 individual members and National Chapters).

The Panel finds the competency-diversity matrix a very commendable practice in terms of enabling the organisation to identify the areas needed for further recruitment. The same practice is maintained for the International Council.

J2	***How does your board oversee the adherence to policies, resource allocation, potential risks and processes for complaints and grievances?***	*3*

The response provides several examples of the different committees available at the Board level. Of relevance are the Finance and Risk Committee (Terms of Reference) which oversees the different aspects relating to financial policies, the effectiveness of internal controls, financial risk monitoring at the movement level, and risk management.

There's also a Board Ethics Committee which provides support to the Board and to the TI Secretariat on overseeing complaint and grievance systems (Terms of Reference). The body oversees the TI Integrity System, and provides assessment/ recommendations on allegations escalated to it, or those involving its CEO, CAO, Board and the Integrity Manager. The BEC has supported in establishing local Anti-Harassment policies for National Chapters.

The response does not outline how its Board oversees the relevance and adherence to policies beyond those relating to complaints and finance. The Panel therefore requests further information on this end.

J3	***What processes and mechanisms does your organisation have in place to handle external complaints, including those relating to unacceptable conduct? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.***	*2*

The Integrity Reporting process is available on TI's website (link). The policy has a clear definition of what constitutes a complaint, points to relevant principles or policies the organisation has agreed to abide by and can be held accountable against. The Integrity Reporting policy also outlines the steps and timeframe for handling complaints, and points to a dedicated channel for complaints submission. There is a dedicated channel for external whistleblowing reporting (ERWP). The policy also outlines reporting processes in case the violations concern the Integrity Manager, the Board or the CEO. Additionally, the policy includes a specific section on communication and training, ensuring that it is available within the organisation's

	website, intranet, and within agreements with service providers, chapters, partners, among others. The Panel notes positively the offline accessibility for the ERWP, and asks if there are other offline channels available for integrity reporting as well? The system has been online since the last quarter of 2021, but due to personnel changes and internal reasons, results were not published online as it was not considered truly reliable. However, an overview of the number and nature of complaints received since the system went live is included within the report. The Panel looks forward to seeing the statistics for 2022 in the next report, alongside the organisation's reflection on how the system is working.	
J4	***How are internal complaints handled? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.*** The Integrity Violation policy further applies internally. The policy has sections within it that outlines the support and protection available for complainants (both internally and externally). The policy further outlines that the Integrity Manager must give routine training (at least once a year) to its staff on this end. The report states that only one internal complaint was received last year, although it could not be fully resolved since the member of staff only submitted the grievance after they had left the organisation. The Panel would be curious to understand if this number is unusually low, and if the organisation can offer further reflection in terms of challenges and weaknesses faced in fostering a culture where staff feels comfortable to report grievances. In particular, since the data provided in section C3 indicates that 29% of staff does not feel that the organisation is inclusive, the Panel would like to understand if there are efforts to enhance inclusion and belonging, to improve this perception. A potentially useful approach comes from CIVICUS's work in creating more awareness on the available channels (informal and formal) for staff to voice grievances (see pg. 44 of their annual report).	**2**
J5	***How do you make decisions about the need for confidentiality and protecting the anonymity of those involved?*** The Integrity System enables anonymous reporting, however it does outline how this might have some limitations (including inability to follow up) and points to the external whistleblowing reporting point as a possibility in cases where complainants	**2**

might wish for further protection while benefiting from an intermediary means of communication.

The policy also protects the identity of those involved. The balance between confidentiality and needs for transparency is considered through the legal framework for GDPR allowing for the rejection of an information access request to protect legal interests.

The Panel furthermore looks forward to learning about the operational safeguards being developed for the whistleblowing channels.

K. Leadership is dedicated to fulfilling the 12 Commitments

K1	***How is the governing body and management held accountable for fulfilling their strategic promises, including accountability?***	2

The response states that TI's Board carries out an annual self-evaluation, the result of which is presented at the Annual Membership Meeting or afterwards. The Panel would like to encourage TI to further explore how the Board can evaluate its ability to listen and respond to stakeholders' needs.

If confidentiality allows, it would be good to further learn about the actions (especially those that impact accountability processes) taken in response to these self-evaluations.

Senior management staff go through an annual review as every other staff member.

K2	***What steps have you taken to ensure that staff are included in discussing progress toward commitments to organisational accountability?***	3

The response states that the organisation carries out participatory planning processes to provide staff with opportunities to input into different processes. A list of different opportunities for staff to input into decision making is provided; notable among these are direct opportunities to post anonymous and non-anonymous questions to the CEO.

Previous section (C3) states that more staff perceives the organisation to be inclusive internally, but no explanation was provided in terms of how this change took place. Therefore, the Panel would be curious to know about some examples on how staff's inputs have shaped and influenced the organisation's accountability practices.

The response also states that it holds a meeting to discuss the Accountability Report with all of its staff. What were the outcomes of this meeting?

K3	*What is your accountability report's scope of coverage? (i.e. are you reporting for the whole organisation or just the international secretariat?) What authority or influence do you have over national entities and how, specifically, are you using it to ensure compliance with the accountability commitments and to drive the overall accountability agenda?*	-
	The scope of the report is the TI Secretariat, which includes its Berlin and Washington D.C offices.	
	TI's National Chapters are separate and independent entities, however to belong to the movement, some compliance is required. However, the TI-S does not have further power than that over its National Chapters.	