

15 June 2012

Dear Helen McCallum,

We are writing to you as members of the Independent Review Panel of the INGO Accountability Charter, in order to give you feedback on the Report which you submitted for the reporting deadline in April 2012.

We would like first of all to thank you for your participation in this exercise and to recognise the commitment to accountability that this demonstrates.

Our approach to assessing the reports which we have received has been to focus on three dimensions in particular:

- How **complete** is the report in relation to the guidelines used?
- How strong is the **evidence** given for the self-assessment that each organisation has conducted?
- What evidence is there of **institutional commitment** to greater accountability and to using the reporting process to advance it?

On **completeness**, we acknowledge the demanding nature of many GRI requirements and recognise that not all of them are as material as others. In particular for smaller organisations, some requirements may be overly demanding. Nevertheless they give good guidance and we have attached a note that goes through the shortfalls against the reporting template in detail. In addition we have highlighted below areas where we felt, in particular, that your organisation could improve as well as other areas which we considered as strengths in your report.

On **evidence**, we looked in particular for references not only to relevant policy documents, but also to examples where the self-assessment was supported by specific action (for example, drawn from operational activities, whether successful or unsuccessful). It is important for us to see that the accountability commitments that you made when signing the Charter, lead to informed corrective action and ultimately improve the quality of your work.

On **institutional commitment**, we looked for evidence of top-level ownership of the report (for example in the opening statement signed by the Chief Executive); of using the report as a means of identifying areas of relative strengths and weaknesses in the organisation (as opposed to a box-ticking exercise); and of a systematic concern with accountability, including recognition of areas for further work. We would hope that progress in such areas would be high-lighted in future reports.

Since we first started assessing the reports we have noticed a **marked improvement in quality** and an improved commitment to accountability. However we have highlighted some common **areas for improvement**, in particular the indicators related to the environment (EN16, EN18), diversity and ethnicity (NGO4, LA13), how findings from programme evaluations have influenced internal learning and future decisions (NGO3), training in anti-corruption policies (SO3) and complaints handling mechanism in place (NGO2).

With regard to the **complaints handling mechanism**, we would like to remind Members that it is now a mandatory requirement for Charter Members to have such a mechanism in place. This is at the core of good accountability.

Regarding **diversity and ethnicity**, we would like to encourage Members to think about who is likely to be excluded from their work and programmes.

With regard to the generally weak reporting on **anti-corruption policies**, we would like to encourage Members to use the Anti-Bribery Checklist and Anti-Bribery Principles and Guidance for NGOs produced by Transparency International available under the following web-links: http://www.transparency.org.uk/attachments/046_NGO_Anti-bribery_Principles_and_Guidance.pdf and <http://www.transparency-se.org/TI-ABC-20-point-anti-bribery-checklist.pdf> In case of specific interest you may also contact Stan Cutzach at Transparency International under scutzach@transparency.org

In many reports Members just noted that they have the relevant policies in place but we feel that **more examples** of the policies in practice would be useful. Only when it is supported by evidence does the policy come to life and its usefulness can then be assessed.

Finally a word on the presentation. We value **succinctness and accessibility**. In some reports access to relevant information is made difficult by a lot of immaterial information being given at the same time. Please try and include only the essential information.

An interesting way of improving accessibility was chosen by some organisations, who integrated the accountability report into their annual report and gave links to the relevant indicators in a GRI table. To ensure a greater link between the **Charter commitments** and GRI reporting (focussing on transparency) we would like to emphasise our support for the Charter Board decision that all future reports should have a clear link between the Charter principles and the reported actions.

Please note that as a Panel we feel that part of our role is to encourage organisational improvement. To that end we are enclosing, for your information some examples of what we believe to be **Good Practice** in responding to some individual indicators, based on the GRI framework. This document consists of examples from all reports reviewed thus far and has been sent as an attachment to you per email. We would like to encourage you to look at this document as we feel this will be a good learning exercise for all Members to learn from each other.

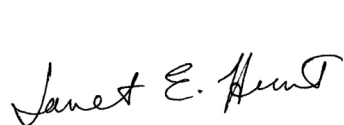
Organisation-specific feedback to Consumers International

*The report is a good attempt for a first submission, and we welcome the honesty in your report. Regarding **completeness**, it is good that you have tried to address all the indicators however there are still a lot of omissions. In terms of **evidence**, we would encourage you to provide more examples and evidence to support your accountability commitments. Your **institutional commitment** is good, and we appreciate that fulfilling the Charter commitments is one of your strategic objectives. We have noted that although your organisation encourages consumers to file complaints against companies, your organisation does not have a complaints handling mechanism itself, and see this as a serious omission. We appreciate the format of your report, however we would recommend including hyperlinks between the table provided in the annex and the annual report for ease of access for the reader.*

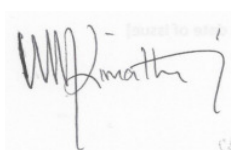
Our intention is that this letter, and any response that you may wish to provide, should be made publicly available on the Charter website, along with your organisation's report. You can find the reports that were reviewed previously on the Charter website under the section Charter Members/Member Reports. However, should there be errors of fact in the feedback above or in the more detailed note below on conformity with the reporting framework, we would of course wish to correct these before publication.

Should you have any comments we would appreciate a response by **13 July 2012**.

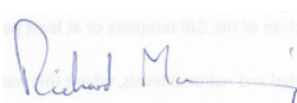
Yours sincerely,

Handwritten signature of Janet E. Hunt in black ink.

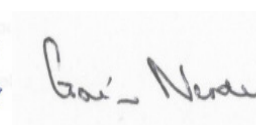
Janet Hunt

Handwritten signature of Wambui Kimathi in black ink.

Wambui Kimathi

Handwritten signature of Richard Manning in blue ink.

Richard Manning

Handwritten signature of Gavin Neath in black ink.

Gavin Neath

1st Review Round 2012 Note on Accountability Report

Organisation: Consumers International
Reporting period: 1 January- 31 December 2010

What GRI reporting level did the organisation report on?

- ☐ A
☐ B
☒ C

Did the Secretariat contact the organisation for further information before forwarding the report to the panel?

- ☒ Yes
☐ No

Comment: On 16 April the Secretariat asked the organisation to resubmit its report to include 9 indicators which were missing or send some explanation for not reporting on these indicators. The organisation resubmitted its report with the additional indicators.

COMMENTS ON THE INFORMATION PROVIDED IN THE REPORT

Profile (recommended 28)

Number of Profile components the organisation reports on in total: **28**

Number of the recommended Profile components the organisation reports on: **28**

Number of additional Profile components the organisation reports on: **0**

Profile	Comments
Strategy and Analysis	
1.1*	Partially addressed This component is covered in the 23-page annual report of the Council which incorporates the Director's report. The report does not include information on the broader trends affecting the organisation, the views on performance, failures, or the main challenges it will face in the future.
Organisational Profile	
2.1*	Fully addressed
2.2*	Fully addressed
2.3*	Fully addressed
2.4*	Fully addressed
2.5*	Fully addressed
2.6*	Fully addressed
2.7*	Fully addressed
2.8*	Partially addressed The report does not include the number of employees.
2.9*	Fully addressed
2.10*	Fully addressed
Report Parameters	
3.1*	Fully addressed
3.2*	Fully addressed
3.3*	Fully addressed
3.4*	Partially addressed The name of the contact person is not provided.

3.5*	Fully addressed
3.6*	Fully addressed
3.7*	Fully addressed
3.8*	Fully addressed
3.10*	Fully addressed
3.11*	Fully addressed
3.12*	Fully addressed
Governance, Commitments, and Engagement	
4.1*	Fully addressed
4.2*	Fully addressed
4.3*	Fully addressed
4.4*	Fully addressed
4.14*	Fully addressed
4.15*	Fully addressed

*: Recommended Profile components

Indicators (recommended 18)

Number of indicators the organisation reports on in total: **10**

Number of the 18 recommended indicators the organisation reports on: **9**

Number of additional indicators the organisation reports on: **1**

Indicators	Comments
Program Effectiveness	
NGO1*	Partially addressed The report provides some information on the involvement of stakeholders, but does not include information on how decisions and decision-making process are communicated to stakeholders; on how stakeholders participate in each stage of the process; or on how feedback from stakeholders has reshaped policies/procedures. Some further information regarding this indicator is however, provided under component 4.4.
NGO2*	Partially addressed The organisation indicates that it does not have a formal complaints mechanism in place because of its limited scale and capacity. However, it indicates that the general public can contact the organisation via its website. The organisation is reminded that Charter Members are now requested to have complaints handling mechanism for internal and external complaints.
NGO3*	Partially addressed The report only indicates that a process was initiated to design an appropriate monitoring, evaluation and learning framework. The report does not include information on how the results from evaluation contribute to internal learning, example of adjustments, or how these adjustments were communicated.
NGO4*	Partially addressed The organisation indicates that it does not have a policy related to incorporating gender or diversity into programme design, however, it indicates that it is committed to promoting equal opportunities.
NGO5*	Partially addressed The report includes information on the process for arriving at advocacy positions, but does not provide information on the process for corrective adjustments, examples of corrective actions, where the campaigns and positions are published, or the process used for exiting a campaign.

NGO6*	Partially addressed The report only includes information regarding how campaign priorities are determined, and does not provide information on other areas of work, or on the process to promote learning or to identify opportunities for partnership.
Economic	
NGO7*	Not addressed The report does not include information on the processes in place to track the use of resources or standards that serve as the basis for this tracking system.
NGO8*	Fully addressed
EC7*	Fully addressed
Environmental	
EN16*	Partially addressed The organisation indicates that it does not have the data or the resources to report against this indicator for the reporting period and does not mention whether it will put a system in place to collect this information in the future.
EN18*	Partially addressed The report provides information on initiatives to reduce greenhouse gas emissions, but the organisation does not state the reduction achieved.
Labour	
NGO9	Partially addressed The report provides some information on the internal feedback mechanism, but it does not include the key components of this mechanism.
LA1*	Partially addressed The report does not include information the number of volunteers broken down by full-time/part-time.
LA10*	Partially addressed The organisation indicates that it does not record the number of hours of training received per employee per year and does not mention whether it will put a system in place to collect this information in the future.
LA12*	Fully addressed
LA13*	Partially addressed The organisation indicates that it does not monitor or record minority group membership of the board or employees and does not mention whether it will put a system in place to collect this information in the future.
Society	
SO1*	Partially addressed The organisation indicates that it does not have organisation-wide programmes or policies for assessing the impacts of operation on local communities.
SO3*	Partially addressed The organisation indicates that it does not have anti-corruption policies and procedures in place and does not mention whether it will introduce any.
Product Responsibility	
PR6*	Fully addressed The organisation indicates that it does not engage in fundraising-related marketing activities and therefore does not apply any voluntary code/standards.

*: Recommended indicators

Organisation's commitments for the future

- None specified