

07 December 2011

Dear Marie Soveroski,

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 in time for the reporting deadline in September 2011.

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 want to recognise the demanding nature of many of GRI's requirements. Many organisations find it difficult to respond to some of the more detailed requests for information. We attach a note by the Secretariat that goes through the shortfalls against the reporting template in detail. While you may find this of value, we should like to emphasise that we do not consider that, at least at this stage of the exercise, it is essential to meet every element of the template – which we recognise may in some cases be overly demanding, particularly for smaller institutions. We have however noted below areas where we felt that your organisation might wish to invest more attention in your next 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).

On **institutional commitment**, we looked for evidence of top-level ownership of the report (for example an 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.

Please note that as a Panel we feel that part of our role is to encourage improved reporting. To that end we are enclosing for your information some examples of what seemed to us Good Practice in responding to some individual indicators, based on the GRI framework. This document consists of examples from all reports reviewed in 2011.

Organisation-specific feedback to Earthrights

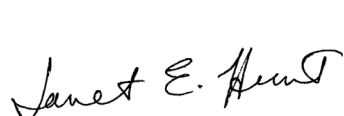
The report you have submitted is very poor and does not meet the standards that we envisage for the Members of the INGO Accountability Charter. The report is not **complete**, there is a low level of **evidence** to be found and no signs of **institutional commitment** towards accountability. Your systems seem to be very weak but we do believe that you could have included more information on your work and processes. **We would like to ask you to rewrite the report** and provide us with a **new version by 16 March 2012** at the latest. We would then review your report again. We are aware that this might be a big challenge, however we encourage you to go through this learning process. If you need support, please do not hesitate to contact the Charter Secretariat or have a look under "Support for Members" on the Charter website. To give you some guidance for your next report, we also attach the Good Practice examples that we have compiled for some of the GRI indicators.

Please note that in the meantime, a note explaining that we asked you to re-write your report will be published on the Charter website. After the end of the three months, your revised report can be published in case a higher standard has been ascertained. If we have not received a re-written report, the current report will be published. We would appreciate **an answer on this letter by 16 January 2012** at the latest, in order to learn how you plan to approach this task.

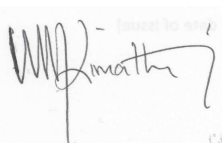
Should there be errors of fact in the feedback above or in the more detailed Secretariat note below on conformity with the reporting framework, we would of course wish to correct these before publication.

Should you have any comments we would appreciate a response *by 16 January 2012*.

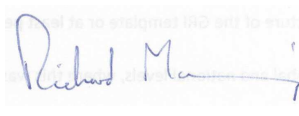
Yours sincerely,



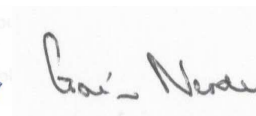
Janet Hunt



Wambui Kimathi



Richard Manning



Gavin Neath

**Note on accountability report, reviewed in October 2011**

Organisation: EarthRights International (ERI)  
 Reporting period: 1 February – 16 August 2011 (see comment below for more information)

**Reporting framework used**

- ☒ GRI Reporting Framework  
☐ Interim Reporting Framework

**On the GRI Reporting Framework**

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: The Secretariat contacted the organisation since it was not clear what period the report covered and since the answer on indicator 16 ended in the middle of a sentence. On the first issue, the organisation sent the following comment: "Although the information given in the report is not limited to a particular time period, in order to match our fiscal year we can list the 'reporting period' as being 1 Feb 2011 to 16 August 2011." On the latter, the organisation submitted a complete sentence which has been included under indicator 16 in the report.*

**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: **none**  
 Number of Profile components commented on: **8**

**"1.1 Strategy and Analysis/ Statement from the most senior decision-maker of the organization."**

*Comment: The report lacks a statement with the explanation that the Executive Director is on sabbatical and therefore unable to submit one.*

**"2.2 Organizational Profile/ Primary activities (e.g. advocacy, social marketing, research, service provision, capacity building, humanitarian assistance, etc.). Indicate how these activities relate to the organization's mission and primary strategic goals (e.g., on poverty reduction, environment, human rights, etc.)."**

Comment: The report does not state how the activities relate to the organisation's mission and primary strategic goals.

**"2.7 Organizational Profile/ Target audience and affected stakeholders. Please include a geographic breakdown."**

Comment: The report does not include information on affected stakeholders/ beneficiaries.

**"2.8 Organizational Profile/ Scale of the reporting organization."**

Comment: The report does not include information on number of employees/ volunteers; assets/ liabilities; or on scope/ scale of activities.

**"3.5 Report Parameters/ Process for defining report content."**

Comment: The report does not include information on the process for defining report content.

**"4.3 Governance, Commitments, and Engagement/ For organizations that have a unitary board structure, state the number of members of the and/or non-executive members highest governance body that are independent and/or non-executive members."**

Comment: The report does not state whether the Board members are independent and/or executives.

**"4.4 Governance, Commitments and Engagement/ Mechanisms for internal stakeholders (e.g., members), shareholders and employees to provide recommendations or direction to the highest governance body."**

Comment: The report does not state any topics raised through the mechanisms in place.

**"4.15 Governance, Commitments and Engagement/ Basis for identification and selection of stakeholders with whom to engage."**

Comment: The report does not state information on the organisation's process for identifying stakeholder groups.

#### **Indicators (recommended 18)**

Number of indicators the organisation reports on in total: **18**

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

Number of additional indicators the organisation reports on: **none**

Number of indicators commented on: **16**

**"NGO1: Processes for involvement of affected stakeholder groups in the design, implementation, monitoring and evaluation of policies and programs."**

Comment: The report only includes information on processes for involvement of stakeholders within one of the organisation's working areas.

**"NGO2: Mechanisms for feedback and complaints in relation to programs and policies and for determining actions to take in response to breaches of policies."**

*Comment: The organisation claims that there are no policies involved in their work, other than internal policies.*

**“NGO3: System for program monitoring, evaluation and learning, (including measuring program effectiveness and impact) resulting changes to programs, and how they are communicated.”**

*Comment: The organisation states that there are no formal means established to monitor and evaluate their work.*

**“NGO4: Measures to integrate gender and diversity into programme design, implementation, and the monitoring, evaluation, and learning cycle.”**

*Comment: The report does not include information on the organisation’s tools for diversity analysis/ actions/ measures taken in relation to programme design and implementation.*

**“NGO5: Processes to formulate, communicate, implement, and change advocacy positions and public awareness campaigns.”**

*Comment: The organisation states that there are no formal processes established to formulate, communicate, implement or change advocacy positions.*

**“NGO6: Processes to take into account and coordinate with the activities of other actors.”**

*Comment: The report does not give any information on the processes for identifying potential for duplication; promoting learning from others; or identifying opportunities for partnerships.*

**“NGO7: Resource allocation.”**

*Comment: The report does not include any information on how the use of resources is tracked.*

**“NGO8: Sources of funding by category and five largest donors and monetary value of their contribution.”**

*Comment: The report does only include information on the three largest donors.*

**“EN16: Total direct and indirect greenhouse gas emissions by weight.”**

*Comment: The organisation states that this “would be extremely difficult to calculate”. The report lacks information on greenhouse gas emissions.*

**“EN18: Initiatives to reduce greenhouse gas emissions and reductions achieved.”**

*Comment: The organisation states that this “would be extremely difficult to quantify”.*

**“LA1: Total workforce, including volunteers, by type, contract, and region.”**

*Comment: The report does not include information on contract type; full/part time or information on volunteers.*

**“LA10: Average hours of training per year per employee by employee category.”**

Comment: *The report does not include information on the average number of hours of training per employee per year.*

**“LA13: Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.”**

Comment: *The report does not include information on the governance body and employees based on age group.*

**“SO1: Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.”**

Comment: *The organisation indicates that this is “a very hard indicator to measure”. The report lacks information on programmes in place to assess impacts of operations on communities.*

**“SO3: Percentage of employees trained in organization’s anti-corruption policies and procedures.”**

Comment: *The organisation states that it has no formal anti-corruption procedures.*

**“PR6: Programs for adherence to laws, standards, and voluntary codes related to ethical fundraising and marketing communications, including advertising, promotion, and sponsorship.”**

Comment: *The organisation indicates that it has nothing to contribute on this indicator.*