

20 December 2013

## Independent Review Panel – Virtual Meeting 28-29 November Letter to the Members in this Review Round

Dear Salil Shetty,

Thank you for submitting your accountability report to the Charter's Independent Review Panel for assessment. As in previous years we found that the quality of reports is generally improving, demonstrating greater institutional commitment and more evidence that mechanisms are working in practice. Before providing individual feedback on your organisation's report, allow us however to highlight three areas of general concern:

### **1.) *Embedding the Charter as a tool for organisational development (3.5)***

The disclosure profile 3.5 looks like a rather technical question on how the report is compiled and organisations tend to report accordingly. But it really asks for a process that is at the heart of what the Charter wishes to achieve: using the report as an opportunity for a cross functional systematic and critical reflection on how accountability is best implemented underpins the legitimacy and quality of your organisation's work. Accountability is all too often perceived as a defensive tool, when it is really a mechanism to pro-actively support organisational development. Please describe under 3.5 how you use the reporting process to embed accountability into your organisation. Against this background Members are also strongly encouraged to place the Charter logo prominently on their website and to further link to the Charter website, so that stakeholders know what to hold you accountable against.

### **2.) *Complaints Handling Mechanisms (NGO2)***

Having a fully functioning complaints handling mechanism in place is the only Minimum Standard for Charter Members so far. The Panel is very concerned about rather slow progress by many Charter Members to comply with this. We have therefore decided to ask the Charter Board to look into implementing a timeline and sanctions policy for compliance. In our view the leeway should be no longer than two to maximum three years after a Minimum Standard has been adopted. You find examples of well-functioning complaints handling mechanisms in the Good Practice document on the Charter website, capturing good examples from this and previous reporting rounds.

### **3.) *Succinctness and communication quality***

There is a danger that accountability standards develop a life of their own and become increasingly complex and detached. We have noted that Charter reports tend to get longer without necessarily providing more relevant information. It is important however to use these reports to actively communicate internally and externally how accountability is part of the DNA of your organisation and strengthens the quality of your work. In order for these reports to be read, we suggest that they should have a maximum of 40 pages. For each GRI indicator it is sufficient to report three things:

- a) Do you have policies and processes in place to address the issue?
- b) Do you have evidence that it is embedded in systematic practice?
- c) Is there evidence to show that this has led to improved quality of work?

Sometimes the Panel asks for more information. We are trying to do so only where it is necessary, and we encourage you to be as succinct as possible, and take the above three parameters as guidance. Also try to avoid repetition and where illustrations are given, please keep these brief. Organisations who wish to merge their accountability report with the annual report are encouraged to additionally provide a separate and more reflective addendum relating to the Charter if the annual reports do not embrace that due to a desire to be more promotional.

Organisation-specific feedback to Amnesty International:

The organisation's sixth report is very good and Amnesty International clearly links the GRI accountability indicators to the normative commitments made in the Charter Principles. The report has improved with regard to reporting on performance rather than disclosure only. Overall, the report provides strong evidence and a great level of institutional commitment. Some areas like environmental management and local hiring can be seen as **good practice** examples for other organisations. The Panel positively notes some improvements from previous reports (e.g. developing of Key Performance Indicators, implementing a new Resources Allocation Mechanism); however there are still some areas which could be further developed or addressed (e.g. how successful are diversity issues mainstreamed into the organisation's programmes and projects; how is the report used internally to drive accountability as a quality assurance mechanism). More information on the challenges of being in the midst of a fundamental organisational change at global level would also have been welcome. The Panel acknowledges that the organisation already includes six additional profile disclosures and two additional performance indicators which will only be mandatory starting 2014. Progress on commitments made in earlier reports has been noticed and compiled in the GAP Analysis Table at the end.

Our intention is that this letter, and any response you may wish to provide, is made publicly available on the Charter website, along with your report. You can find the reports that were previously reviewed on the Charter website. However, should there be errors of fact in the feedback above or in the note below we would of course wish to correct these before publication. Please share these comments or corrections by 20 January 2014.

If you have any other feedback or comments on our work, please share with us by sending them to the Charter Secretariat. We would very much like to hear your views.

Yours sincerely,



Janet Hunt · Wambui Kimathi · Tony Tujan · Richard Manning · Louise James · Brendan Gormley

**Review Round October 2013  
Cover Note on Accountability Report  
Amnesty International**

Reporting period: Calendar year 2012

<b>PROFILE DISCLOSURES</b>	
<b>Profile</b>	<b>Comments</b>
<b>Strategy and Analysis</b>	
1.1	<i>Fully addressed</i> The CEO's statement provides a strong commitment to accountability as a guiding principle for the organisation, a good record of implementing improvements during the current reporting period and clear commitments to further improvements in the coming years. A bit more information on how strong accountability mechanisms de facto helped improve the effectiveness of Amnesty International would have been welcome.
<b>Organisational Profile</b>	
2.1 – 2.7	<i>Fully addressed</i>
2.8	<i>Fully addressed</i> Very interesting information on the number of activities is reported. Some evaluation of the numbers and changes over time would be welcome.
2.9 – 2.10	<i>Fully addressed</i>
<b>Report Parameters</b>	
3.1 – 3.4	<i>Fully addressed</i>
3.5	<i>Fully addressed</i> The report includes relevant information on the process for defining the report's content. Amnesty is however encouraged to report more on who has contributed in which way to the report and how this process was used to better embed the Charter as a quality assurance tool within all functions and levels of the organisation.
3.6	<i>Fully addressed</i>
3.7	<i>Fully addressed</i>
3.8	<i>Fully addressed</i> Amnesty is commended for a systematic and comprehensive collection of information from its national entities on compliance with Charter commitments which can be seen as <b>good practice</b> .
3.10 – 3.13	<i>Fully addressed</i>
<b>Governance, Commitments, and Engagement</b>	
4.1 – 4.3	<i>Fully addressed</i>
4.4	<i>Fully addressed</i> Amnesty can be commended for giving very good evidence examples where internal stakeholder recommendations to the highest governance body have resulted in concrete management response.
4.5 – 4.6	<i>Fully addressed</i> The answer provides relevant information about remuneration and mechanisms for handling potential conflicts of interest for governing bodies. For the next report it would be good to provide a link to the conflict of interest policy and assess if it works.
4.8	<i>Fully addressed</i> Relevant information is given about internally developed codes of conduct. More information on how the code of conduct will be applied across the

	organisation and how it relates to internationally agreed standards would be welcome for the next report.
4.10	<i>Fully addressed</i> The answer provides relevant information about evaluation of the governance body. Commitments to further improve the effectiveness of the International Board are noted in the GAP analysis overview.
4.14 – 4.16	<i>Fully addressed</i>

<b>PERFORMANCE INDICATORS</b>	
<b>Program Effectiveness</b>	
<b>NGO1 – Stakeholder involvement</b>	
<i>Fully addressed</i> The answer reflects a differentiated and committed approach to meaningful stakeholder involvement. A link to the written guidelines would be welcome. The organisation is encouraged to report if and how the feedback from the early 2013 survey on AI's participatory approach to campaigning reshaped policies or the decision making process.	
<b>NGO2 – Mechanisms for feedback and complaints</b>	
<i>Fully addressed</i> The organisation developed a new set of Complaints Guidelines in 2012, which were put into force on 1 January 2013. Please provide a link to this policy in the next report. An explanation on the great variance of complaints filed in 2011 compared to 2012 would have been welcome. It would be further interesting to know how an effective <i>feedback</i> and complaints handling practice has led to corrective decisions or improvements in the quality of AI's work.	
<b>NGO3 – Programme monitoring, evaluation and learning</b>	
<i>Fully addressed</i> The organisation has established a clear and succinct monitoring and evaluation framework. A link to the "Dimensions of Change" paper in the report would be welcome. Senior management response to the findings of its monitoring system is ensured.	
<b>NGO4 – Gender and diversity</b>	
<i>Partially addressed</i> Good information is provided on AI addressing and embedding diversity goals within the organisation's own movement and workforce. No information is given on how Amnesty mainstreams diversity issues into its work programs and projects, how successful this has been in the past and if targets for improvement have been set for the future.	
<b>NGO5 – Advocacy positions and public awareness campaigns</b>	
<i>Fully addressed</i> Significant efforts are reported to improve AI's campaigning / advocacy strategies and guidelines. Links to these written documents (to be completed in 2013) should be given in the next report as well as information on how these have led to strategic management responses. It is noted that the organisation reflects upon increasing its campaigning alignment, since only 51 % of its entities align themselves to AI's global campaign priorities.	
<b>NGO6 – Coordination with other actors</b>	
<i>Partially addressed</i> The organisation reports that formal policies require the identification and consultation with relevant other stakeholders before entering into a campaign. It does not outline however the principles and criteria it uses to ensure the effectiveness of the mapping exercise. It seems to look very much at the avoidance of duplication and less at opportunities for greater leverage through systematic alignment with optimal partners. The organisation has taken on board the feedback of the last report and wishes to improve the standards through which it holds the	

<p>movement to account for meaningful participation of other actors. However, there are still no formal processes in place to promote learning from others.</p>
<p><b>Economic</b></p>
<p><b>NGO7 – Resource allocation</b>  <i>Fully addressed</i>        Information is provided on <i>who</i> is involved in the processes that ensure alignment of resource allocation with AI's strategic goals. Not much information is given on evidence that these processes work well as quality assurance mechanisms for AI's work.</p>
<p><b>NGO8 – Sources of funding</b>  <i>Fully addressed</i></p>
<p><b>EC7 – Local hiring</b>  <i>Fully addressed</i>        As in the previous report, it is appreciated that almost all staff, including the Directors, are locals, which can be seen as <b>good practice</b>. The organisation states that these figures may fluctuate once the change to more regional offices around the world is implemented as the organisation is obliged to redeployment opportunities for current International Secretariat staff.</p>
<p><b>Environmental</b></p>
<p><b>EN16 – Greenhouse gas emission by weight</b>  <i>Fully addressed</i>        As noted in previous reports, not all national entities reported on their emissions. A more succinct overview of developments over time would be welcome for the next report.</p>
<p><b>EN18 – Initiatives to reduce greenhouse gas emission</b>  <i>Fully addressed</i>        The information provided is complete and clear and gives many very good examples of CO2-reducing measures. In particular AI is commended for linking sustainability objectives to senior strategic decision making. This can be seen as <b>good practice</b> for other large CSOs.</p>
<p><b>Labour</b></p>
<p><b>LA1 – Total workforce</b>  <i>Fully addressed</i></p>
<p><b>NGO9 – Mechanisms for workforce feedback and complaints</b>  <i>Fully addressed</i>        Amnesty has got substantial mechanisms for workforce feedback in place. Information on how this positively informed management decisions would be welcome in the next report.</p>
<p><b>LA10 – Workforce training</b>  <i>Fully addressed</i>        A good and succinct overview is provided on AI's training offers and the average hours of training that staff members receive. It would be interesting to know how training needs are systematically identified and how the effectiveness of trainings is evaluated.</p>
<p><b>LA12 – Performance and career development reviews</b>  <i>Partially addressed</i>        The organisation acknowledges that further work has to be undertaken to improve the organisations' effectiveness through optimal use of development reviews. Only 44% of staff received performance reviews in 2012. The appraisal form is under review. More information is welcome on how performance and development review systems are effectively linked to the attainment of AI's overall strategic goals - how it will help to assess global talent needs and support its development.</p>
<p><b>LA13 – Composition of workforce and governance bodies</b>  <i>Fully addressed</i></p>
<p><b>Society</b></p>
<p><b>SO1 – Impact of operations on communities</b>  <i>Fully addressed</i></p>

<p>Comprehensive information is given on how AI assesses the intended and unintended consequences its interventions have on communities. As in last reporting round's feedback from the Panel, the organisation is invited to provide evidence on whether the increase of its presence in the Global South has indeed improved relationships with local right-holders.</p>
<p><b>SO3 – Anti-corruption training</b> <i>Partially addressed</i></p> <p>The organisation formally approved and implemented an anti-bribery and corruption policy in May 2012. It should be noted that the percentage of staff receiving anti-corruption training is with 3% as low as in 2011. Conducting a comprehensive bribery and corruption risk assessment as well as the incorporation of anti-bribery provisions into policies and standard contracts is however recognised as <b>good practice</b>.</p>
<p><b>SO4 – Actions taken in response to corruption</b> <i>Fully addressed</i></p> <p>It is positively noted that the organisation already reports against this performance indicator and the answer provides clear and comprehensive information.</p>
<p><b>Product Responsibility</b></p>
<p><b>PR6 – Ethical fundraising and marketing communications</b> <i>Fully addressed</i></p>

## Amnesty International Gap Analysis Table – Areas of Commitments and Progress achieved

Accountability is a process of continuous improvement. Each year Charter Members in their accountability reports identify and prioritise areas for improvement and corrective actions they plan to take. As of reports submitted in 2014, Members are asked to capture these commitments in this Gap Analysis Table. The Independent Review Panel may suggest the Member to add further issues when reviewing the Member's report. Each year following, the table shall be submitted along with the accountability report and will then be used as a basis to demonstrate progress. The table will be published on the website along with the accountability report and the feedback from the Panel. Please note that the rows where commitments cannot be identified can be deleted from the table.

GRI – Performance Indicators	2010	2011	2012	2013
<b>Program Effectiveness</b>				
NGO1: Processes for involvement of affected stakeholder groups.	<b>In report covering 2010:</b> “(...) we will be looking into more participatory research methods as well as developing and adapting general participatory methodologies and tools for mobilization of rights holders.”	<b>In report covering 2011:</b> “The Research and Crisis Response Program has produced guidance on the use of participatory techniques and strategies at all stages of the research cycle. (...) The guidelines will be finalised and issued by the end of 2012.”	<b>In report covering 2012:</b> “In December 2012, [we] completed a set of guidelines for the movement to support partnerships in campaigning (...) as well as core principles and case studies. These guidelines will be rolled out through 2013 and 2014 (...).”	
NGO3: System for program monitoring, evaluation and learning.	<b>In report covering 2010:</b> “We have drafted these key performance indicators (KPIs) and are in the process of defining global targets for the rest of the Integrated Strategic Plan in place until end 2015. We are planning to roll this out in 2012 (...).”	<b>In report covering 2011:</b> “(...) in 2012, we plan to finish the identification of a set of measurable KPIs and establish processes for how this information can be collected. In 2013, we expect to roll out the measurement and reporting of these KPIs.”	<b>In report covering 2012:</b> “During 2012 these [KPIs] were developed in seven areas (...). More work is to be undertaken to embed these further into each area of work.” “We recognize the need to expand and develop our methodologies.”	
NGO4: Measures to integrate gender and diversity into program.	<b>In report covering 2010:</b> “We will be hiring a project manager in 2012 to coordinate the implementation of both the Gender Action Plan and	<b>In report covering 2011:</b> The organisation states its plan “to roll out both the Gender Action Plan and Roadmap for Diversity in 2013.”	<b>In report covering 2012:</b> “(...) roll out the Gender Action Plan and Roadmap for Diversity in 2013.” “(...) gender and diversity	

	<i>the Roadmap for Diversity.”</i>	<i>“[We are] currently recruiting a programme manager to manage this initiative and we expect that the programme manager will be in post by early 2013.”</i>	<i>mainstreaming are to be integrated into core standards for all entities in 2013.”</i> <i>“[We are] planning to undertake a Gender and Diversity survey internally.”</i>	
NGO6: Coordination with other actors			<b>In report covering 2012:</b> <i>“Amnesty International wishes to improve the standards through which it holds the movement to account for meaningful participation of other actors in planning process.”</i>	
<b>Economic</b>				
NGO7: Resource allocation.	<b>In report covering 2010:</b> <i>“The International Executive Committee will undertake an interim evaluation in early 2013 of this resource allocation mechanism to ensure it is operating as planned.”</i>	<b>In report covering 2011:</b> <i>“A new unit [...] has been established in 2012 [...] to manage the allocation process as well as monitoring, evaluation and reporting. The new system (...) will be rolled out from 2013 onwards.”</i>	<b>In report covering 2012:</b> <i>“During 2012 improvements were made to how these allocations were made, through a new Resources Allocation Mechanism. (...) Further improvements are planned for 2013 (...).”</i>	
<b>Environmental</b>				
EN18: Initiatives to reduce greenhouse gas emissions and reductions achieved.	<b>In report covering 2010:</b> <i>“We are aiming to (1) gain an accredited carbon reduction, energy efficiency award; (2) demonstrate commitment to efficiencies, reductions and awareness with new annual goals; and (3) build staff awareness and involvement in sustainability issues.”</i>	<b>In report covering 2011:</b> The organisation reports on progress with regards to Amnesty’s Global Sustainability Program and outlines next steps to be taken (p. 19). <u>Further commitment:</u> <i>“We need to do more to reduce our office CO2 emissions.”</i>	<b>In report covering 2012:</b> No further reductions reported.	
<b>Labor</b>				
NGO9: Mechanisms for workforce feedback and their complaints			<b>In report covering 2012:</b> Promises made for 2013 include <i>“a new whistle-blowing policy”, “regular meetings with staff”, and “a Staff</i>	



			<i>Council</i> ".	
LA12: Percentage of staff receiving performance/career development review.			<b>In report covering 2012:</b> A revised process of the appraisal process will be launched in 2013.	
<b>Society</b>				
SO1: Nature, scope, and effectiveness of any programs			<b>In report covering 2012:</b> "A Roadmap for the transition has been developed and is being rolled out in 2013-2015."	
SO3: Percentage of employees trained in organization's anti-corruption policies and procedures.		<b>In report covering 2011:</b> "In 2012 we aim to finalize the anti-bribery policy (..), and to implement the finalized policy fully in 2013 including training all staff of the International Secretariat."		
SO4 – Actions taken in response to corruption			<b>In report covering 2012:</b> "Core standards regulating organizational matters, including financial integrity", will be finalised in 2013.	
<b>Product Responsibility</b>				
PR6: Programs for adherence to laws, standards, and voluntary codes related to ethical fundraising	<b>In report covering 2010:</b> "We also decided to review our global fundraising policies and procedures and this is a priority for 2012".	<b>In report covering 2011:</b> "We will review the implementation and adherence to [our] global fundraising policies in 2013 and conduct a more detailed evaluation at the end of the plan period in 2015."	<b>In report covering 2012:</b> "In 2013, we will conduct a review of implementation, with a fuller evaluation scheduled in 2015."	