

07 December 2011

Dear Barbara Stocking,

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 Oxfam GB

We believe that your report is very good. It scores high on **completeness** and we particularly appreciate the level of **evidence** that the report provides. We likewise see good signs of **institutional commitment** to accountability, for example through the fact that you present your aims and achievements regarding accountability in the beginning of the report. We also appreciate for example the experience you provide on complaints mechanisms from your work in Pakistan. Furthermore, we do appreciate the information linked to gender and local hiring within human resources. As we know that gender and women's rights are important to your organisation it would however also have been interesting to learn more about the percentage of these groups in high level positions. We believe your answers on the Environmental Performance are best in class.

We see your answers on the following components as **Good Practice** for other organisations (see "Good practice on GRI Reporting II" attached to this letter):

- "EN16 Total direct and indirect greenhouse gas emissions by weight."
- "EN18 Initiatives to reduce greenhouse gas emissions and reductions achieved."
- The collection of accountability objectives."

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 in the beginning of this year 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 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: Oxfam GB
Reporting period: Year ended 31 March 2011

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 two references (on p. 2 and p. 4) were missing; the report indicated that indicator SO2 was reported on, although the heading actually referred to SO3; and the link referred to under NGO4 did not work. Upon this request, the organisation submitted an updated version of the report in which these mistakes had been corrected and a separate version of the document which could not be accessed over the link.

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: **2**

“1.1 Strategy and Analysis/ Statement from the most senior decision-maker of the organisation about the relevance of sustainability to the organisation and its strategy.”

Comment: The report does not include information on the organisation’s vision and strategy; on key events/ achievements/ failures; or on views of performance with respect to goals/ objectives/ standards/ targets.

“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 include information on issues raised through the mechanisms in place.

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: **9**

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

Comment: The report does not include information on how the feedback from stakeholders affected the decisions and decision making processes or reshaped policies/procedures.

“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 report does not include information on mechanisms for assessing complaints and for determining what actions are required in response.

“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 report does not include information on adjustments to policy/ programmes as a result of monitoring/ evaluation/ learning; or on how these were communicated.

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

Comment: The report does not include information on the processes for arriving at public awareness/ advocacy positions; or on processes for taking corrective actions on advocacy positions.

“EC7: Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.”

Comment: The report does not include information on the proportion of senior management from the local community.

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

Comment: The organisation is not in a position to report on the total/ average hours devoted to training for employees/ volunteers per year. The organisation states that the reason is that regions/ countries are empowered to develop their own training programmes.

“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 report does not include information on whether the programmes in place have been effective in mitigating negative/ maximising positive effects; or on how feedback have informed steps toward further community engagement.

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

Comment: The report does not include information on the percentage of employees who have received anti-corruption training.

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

Comment: The report does not include information on the frequency with which the organisation reviews its compliance with its standards/ codes.