Dear Anne-Birgitte Albrectsen,

Many thanks for submitting your INGO Accountability Charter report. In times of conflict and climate change, when civil society organisations (CSOs) have an increasingly important role to play, the space for civil society is shrinking in many parts of the world. Strong accountability and the demonstration that we “walk our talk” have never been more important. It is also against this background that the Charter has initiated an alliance with eight national CSO accountability frameworks to strengthen our collective voice as we devise a shared Global Standard for CSO Accountability.

Before providing you with an individual assessment of your report, there were some issues that arose in all or many reports that the Independent Review Panel wants to share with you:

**Getting fit for the digital age**
Digitisation allows for unprecedented connectivity. At a time when citizens have increased levels of agency and literacy this is a game changer in the way CSOs work. Mobilisation and relationship building with large numbers of people to co-create the change they want to see is at the heart of most new CSO strategies – particularly in campaigning. Working with, not for stakeholders, is not just seen as the right thing to do, but also as the most impactful.

Important in this evolution is moving ICSOs from transparency to actively sharing information, from consultation to joint decision making and from taking responsibility for others to sharing mutually defined responsibilities.

The Charter has initiated the Digital Accountability project and Amnesty International, Greenpeace, Oxfam, Transparency International and others are already intensively involved in this project. We look forward to more cooperation with and among Member organisations on this particular issue and for these issues to be addressed more in future reports.

**Globalisation / National level accountability**
Decentralisation processes usually place more responsibility and capacity at the national level. To ensure an ICSO presents a unified, coherent voice and can protect its brand, a strong and globally shared understanding of mutual accountability is key. Thus, decentralisation often goes hand in hand with a stronger mandate for the ICSOs’ global accountability mechanisms. These should help national entities build capacity in the accountability practice, and also demand stronger delivery on global commitments. Charter Members are encouraged to ensure that all their entities adhere at least to the following minimum standards: transparency, effective and independent oversight, involving people we serve, coordination with partners, sound financial management and impact focus.

**Inclusion and diversity**
Many Charter Members still focus mainly on gender when demonstrating their accountability in terms of diversity. This is a lost opportunity. As we all know, there is also discrimination on the basis of disability, age, ethnicity, etc. Actively reaching out to these constituencies will strengthen their rights and their participation. For example, positive action can increase the employment of those with disabilities or from minority ethnic groups. Such inclusion is central
to a human rights based approach, but may also improve results by tapping into a wider base of experience. For further advice, click here on the outcome of a Charter webinar on inclusion or here to look at some good practice examples of Charter Members.

Please ensure that all points listed above are taken into consideration when further developing your accountability practices in the coming months and collecting data for the next INGO Accountability Charter report.

**Organisation-specific feedback to Plan International**

Plan International’s eighth accountability report to the INGO Accountability Charter is a concise interim report based on last year’s Improvement Analysis, which came along with the Independent Review Panel’s feedback letter. The report is overall very good and comprehensive, clarifying issues identified by the Panel in an open and self-reflective manner. Overall, it is clear that Plan takes the Panel feedback seriously and tries to incorporate it into ongoing or new initiatives or reviews.

**Institutional commitment** to accountability and in particular to transparency is highlighted in the CEO’s opening statement. It is appreciated that Plan International proudly presents Charter membership on their accountability website and uploads the most recent report and Panel feedback (see here). However, Charter Members are also encouraged to publish the Charter logo. This visualisation would strengthen their commitment to accountability more prominently in its digital communication.

The Panel looks forward to Plan International’s next full report on FY2016 clarifying small weaknesses raised in this letter (e.g. number, types and resolution of workforce grievances and complaints or how strong accountability practice and the Charter have helped Plan to achieve better impact) as well as reporting again to the whole reporting framework. Overall, the Panel highlights the need to balance accountability, independence and compliance between Plan International and the national offices so that no mismatch develops in this regard.

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 our 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 amendments by 29 July 2016.

If you have any other feedback or comments on our work, please share them with us by sending them to the Charter Secretariat.

Yours sincerely,

Louise James ∙ Michael Röskau ∙ Jane Kiragu ∙ Rhonda Chapman ∙ John Clark ∙ Saroeun Soeung
PROFILE DISCLOSURES

I. Strategy and Analysis

1.1 Statement from the most senior decision-maker
   Fully addressed
   Anne-Birgitte Albrectsen, the new CEO of Plan International, provides a strong institutional commitment to transparency and accountability. She wants “to transform Plan International into one of the most transparent and trusted players in the international development community” so that those they serve can better influence their priorities via two-way exchange and feedback.

   Transparency makes Plan more accountable and Albrectsen describes how publishing to the International Aid Transparency Initiative (IATI) can save money and time as well as reduces the length of their information and system chain – both at international and national level (see pilot at Plan Netherlands). While this strong commitment to transparency and IATI and how community feedback is used to improve Plan’s programming impact is appreciated, the Panel would be interested to learn more how the INGO Accountability Charter helps to make Plan more accountable to the communities they serve.

   Last year’s statement described the federation-wide Mutual Accountability which understands accountability as a more consistent and results-driven way of making decisions internally which also enhances Plan’s external credibility. It is appreciated that this year’s statement adds the external perspective on the relevance of accountability to achieve strategic objectives.

SIGNIFICANT CHANGES

In FY2015, Plan International developed an organisational definition of accountability to communities: “The ways in which Plan enables children, community members and partners to influence what we do, and hold us responsible for our actions.” Since feedback mechanisms are identified as key drivers for this commitment, tools and guidance on the development of community feedback mechanisms have been developed and will be piloted in FY2016 as part of the new Programme Quality Procedures. The Panel looks forward to progress in this regard.

III. Report Parameters

3.8 Basis for reporting
   Fully addressed
   Plan does not currently monitor how national offices comply with Charter commitments. However, they report on a “significant overlap” between the Charter requirements and Plan’s ‘Global Standards’ which all national organisations are required to comply with. These standards include policies on anti-fraud and corruption, gifts-in-kind, child protection, global risk
management, gender equality and the environment. However, a link to the
document would be helpful to assess if all Charter requirements are indeed
covered.

Would it be possible to use data collected within the ‘Global Standards’ for the
next full Charter report so that Plan can incorporate federation-wide figures and
evidence beyond consolidated financial data? This would be particular helpful
in order to see that the accountability culture is also owned at the national
level.

4.10 Supporting highest governance body’s own performance
Addressed
One of the outcomes of the NGC+ effectiveness review was the
implementation of a meeting for National Organisation Board Chairs and
National Directors to enhance mutual understanding among management and
governance level. The first meeting of this kind took place in November 2015
and the Panel looks forward to learn more how it has informed the Assembly's
practice, how results are communicated to a wider audience and how it has
shaped organisational development and strategic discussions.

Please also provide details of term limits of the International Board in the next
full report.

PERFORMANCE INDICATORS

I. Programme Effectiveness

NGO1
Mechanisms for feedback and complaints
Fully addressed
The results of the Keystone survey caused the useful development of the
Partnership Standards (e.g. creating robust requirements to listen and respond to
partners as well as to manage risks appropriately) which were piloted across the
organisation and are supported by the Guidance on Implementing the Standards.
The latter one includes six principles for working in partnerships: 1) mutual respect
and listening, 2) knowing your partner, 3) clearly defined objectives and non-
negotiable ‘red lines’, 4) sharing responsibility, 5) learning from each other, and 6)
common sense. Links to both documents will be appreciated in the next report.

Furthermore, it will be interesting to see in the near future if the training module on
partnerships is seen as helpful from Plan staff.

The illustrative country examples and evidence provided, demonstrating the
implementation of stakeholder engagement concepts, were seen as Good Practice
in the last report.

IV. Human Resource Management

LA10
Workforce training
Fully addressed
The Plan Academy provides an opportunity for continuous learning on Plan’s Child
Centred Community Development (CCCD) approach. 3,704 learners completed a
Plan Academy course in FY2015. If the overall staff number remained similar to
FY2014, this would mean a commendable increase from 10% to 37% of
employees having received training. This investment underlines Plan’s seriousness.

Generally, training needs are identified as part of Plan’s performance appraisal process. Moreover, part of the workforce planning process at Country Office level involves identifying future capability needs to deliver the strategy and which future training is needed in this regard. From FY2013 to FY2015, Plan invested an annual average of 4.5% of the overall administrative budget into training their workforce.

Finally, the Panel looks forward to hearing more on Plan’s soft launch of the Learning and Development module of their new Human Resources Information System planned for 2016 and will track progress in future reports.

**NGO9**

**Mechanisms to raise grievances**

*Addressed*

Plan reports that 34 cases arose under the Whistleblower Policy in FY2015. Which types of incidents occurred and could they be resolved satisfactorily? While it is understood that the number of grievances and complaints are not consolidated globally, it would at least be appreciated to provide types / themes / areas of concern and resolution in this regard from Plan International and from the various national offices were possible. Moreover, links to the Grievance Resolution Policy, Global Complaints Policy and Whistleblower Policy would be very much appreciated in the next report.

The next Employee Engagement Survey is schedule for FY2016 and the Panel looks forward to being informed on results (with regard to employee satisfaction at the workplace) and action plans resulting from this feedback.