Pathways to Accountability
The GAP Framework

Monica Blagescu, Lucy de Las Casas and Robert Lloyd

Developing and transition countries have almost 80% of the World's population, provide 75% of IMF income, are subject to 100% of IMF programmes but only have 36% of the votes on the IMF Board.

A majority of UN Staff believe they would face retribution or dismissal if they speak out about corruption at the organization.

There are over 15,000 EU lobbyists, 70% representing corporate interests, in an industry which generates an estimated €90m every year.

Over half of the poorest countries in the WTO have no representation in Geneva. This leaves a total of 81 million people who have effectively no voice at the WTO.

NGOs now deliver more aid than the whole UN system.

In 2002, the world's 100 largest TNCs, representing less than 0.2% of the global universe of TNCs, accounted for 14% of sales by foreign affiliates worldwide, 12% of their assets and 13% of their employment.

160 US development and humanitarian INGOs operate in every developing country and receive over $3 billion in private contributions and more than $1.5 billion in government funding each year.

"Foreign Corporations Spend Big to Influence US Environmental Law."

The US has 250 negotiators at the WTO; Bangladesh has one.

Over 10 years the number of known INGOs increased from about 13,000 to over 47,000.

Only 4000 of the world's 65,000 TNCs produce reports dealing with their social and/or environmental performance

In 2004 World Vision International served 100 million people in 96 nations, directly benefiting 2.4 million children through child sponsorship.

"UK charities exaggerated Africa crisis, says report."

2002 figures estimate 65,000 TNCs with 850,000 foreign affiliates across the globe.

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The **Global Accountability Project (GAP)** is part of the Accountability Programme at the One World Trust which aims to generate wider commitment to the principles and values of accountability; increase the accountability of global organisations to those they affect; and strengthen the capacity of civil society to better engage in decision-making processes.

GAP was developed in 2001 with the aim of enhancing the accountability of decision-making processes of inter-governmental organisations (IGOs), transnational corporations (TNCs) and international non-governmental organisations (INGOs) to the individuals and communities they affect. The GAP objectives are to:

• Develop an accountability framework that applies to IGOs, TNCs and INGOs

• Assess the accountability of global organisations and advocate for specific reforms

• Develop a network of individuals to promote learning around the issue of accountability in the IGO, TNC and INGO sectors

• Facilitate and strengthen networking between individuals and organisations working on, or advocating for, accountability reform of global organisations.

A **Global Accountability Report**, *Power without Accountability*, was published in 2003 as part of the pilot phase of GAP. It assessed and compared the performance of 18 organisations from the IGO, TNC and INGO sectors in terms of member control and access to on-line information, and had a positive impact on a number of organisations, which took active steps to increase their accountability.

The **One World Trust** promotes education and research into the changes required within global organisations in order to achieve the eradication of poverty, injustice and war. It conducts research on practical ways to make global organisations more responsive to the people they affect, and on how the rule of law can be applied equally to all. It educates political leaders and opinion-formers about the findings of its research. Its guiding vision is a world where all peoples live in peace and security and have equal access to opportunity and participation.

A short version of this publication is available:
Pathways to Accountability: A Short Guide to the GAP Framework by Monica Blagescu, Lucy de Las Casas and Robert Lloyd, One World Trust, London (UK), 2005.

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Acknowledgments

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Acronyms and reference terms

ACEVO	*Association of Chief Executives of Voluntary Organisations UK*
ADB	*Asian Development Bank*
ALNAP	*Active Learning Network for Accountability and Performance*
ALPS	*Accountability Learning Planning System*
BIS	*Bank for International Settlements*
BOND	*British Overseas NGOs for Development*
CSO	*civil society organisation*
CSR	*Corporate Social Responsibility*
EBRD	*European Bank for Reconstruction and Development*
ETI	*Ethical Trading Initiative*
EU	*European Union*
FWF	*Fair Wear Foundation*
FLA	*Fair Labour Association*
GAP	*Global Accountability Project*
GRI	*Global Reporting Initiative*
HAP-I	*Humanitarian Accountability Partnership-International*
IADB	*Inter-American Development Bank*
IFAD	*International Fund for Agricultural Development*
IGO	*intergovernmental organisation*
IMF	*International Monetary Fund*
ILO	*International Labour Organisation*
INGO	*international non-governmental organisation*
MDB	*Multi-Lateral Development Bank*
MSI	*multi-stakeholder initiative*
NATO	*North Atlantic Treaty Organisation*
NCVO	*National Council for Voluntary Organisations UK*
NGO	*non-governmental organisation*
OECD	*Organisation for Economic Cooperation and Development*
SAI	*Social Accountability International*
SCF-UK	*Save the Children Fund UK*
TNC	*transnational corporation*
UN	*United Nations*
UNICEF	*United Nations Children Fund*
WRC	*Worker's Rights Consortium*
WTO	*World Trade Organisation*
WWF	*World Wildlife Fund*

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The following terms are used throughout the publication:

An organisation's activities

Everything that an organisation does, from decision-making processes to operational and non-operational work such as lobbying

Global governance

"...rule-making and power-exercise at a global scale, but not necessarily by entities authorised by general agreement to act. Global governance can be exercised by states, religious organisations, and business corporations, as well as by intergovernmental and nongovernmental organisations"[1]

International non-governmental organisations (INGOs)

NGOs with operations in more than one country

Intergovernmental organisations (IGOs)

International organisations whose members are two or more governments or state agencies. Within the context of the GAP, inter-agency coordinating mechanisms and hybrid institutional arrangements between inter-governmental agencies are also classified as an IGO.

Mechanism

Either tools or processes, or a combination of the two. Accountability tools refer to devices or techniques used to achieve accountability. These are often applied over a limited period of time and can be tangibly documented and repeated (for example, performance evaluation reports). Accountability processes are generally more broad and multi-faceted than the tools. They emphasise a course of action rather than a distinct end result; the means are important in and of themselves. They are less tangible and time-bound than the tools (for example, stakeholder dialogue).

Non-governmental organisations (NGOs)

A subset of civic organisations defined by the fact that they are formally registered with government, receive a significant proportion of their income from voluntary contributions, and are governed by a board of trustees.[2]

Transnational corporations (TNCs)

Companies with operations in more than one country (also known as multinational corporations).

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1 Keohane (2002)
2 Edwards (2000)

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Reader's guide

The GAP Framework provides a baseline for what is important if organisations are to improve their accountability to stakeholders. It can be used by organisations internally, to increase their accountability, and by stakeholder groups to advocate for accountability reform of organisations that affect them. It does not seek to provide detailed information on approaches to accountability. This reflects the One World Trust's recognition that a one-size-fits-all approach to accountability is not possible. Approaches will differ between organisations, within organisations, and depending on the issue, context and stakeholders involved. However, there are common factors, regardless of the sector, that must be taken into consideration in order to increase accountability in an effective and meaningful way. It is these common factors that are outlined in the guidelines.

Although the guidelines have been drafted to suit intergovernmental organisations (IGOs), transnational corporations (TNCs) and international NGOs (INGOs), their applicability extends to other types of organisations.

The GAP Framework is meant to complement legal and regulatory frameworks that exist at national and international levels, sector-wide accountability initiatives and codes of conduct, international norms, and other standards that are already in place.

Some organisations might have in place some of the mechanisms mentioned in the guidelines as part of their management and governance structures. For these organisations, the guidelines can offer an insight into how the potential of these mechanisms can be maximised with a view of increasing accountability.

Accountability makes a difference to both the organisation (it increases credibility and legitimacy, it strengthens governance structures, and leads to learning and innovation) and its stakeholders (it ensures that their needs are addressed in organisational policies and practices). Yet accountability challenges are plenty too. The guidelines make no claim to address all challenges, but provide a useful resource for those organisations that are ready to start unpacking what accountability means to them and find avenues to becoming more accountable.

In the field of accountability there might not be right or wrong answers, but by working together and sharing lessons organisations can start to address some of the practical challenges of balancing the often conflicting needs of their stakeholders.

Many interested parties have advised on this publication. With more input from a variety of individuals and organisations, it is hoped that both the guidelines and the accompanying text will continuously improve.

The One World Trust welcomes your feedback.
Comments can be sent to **accountability@oneworldtrust.org.**

Overview

This publication is divided into 6 main sections. Although each section builds on the next, they can be read separately.

For readers wanting to get to the heart of the document go to **section 5** where the guidelines are located. These provide a starting point on how organisations can begin to operationalise accountability. However, they will be more meaningful if read in conjunction with **sections 3** and **4** as these explain why we chose the four dimensions and how they can increase accountability. **Sections 1** and **6** are more discursive in nature, but provide an important backdrop to the publication and our work in general, identifying why global organisations lack accountability, why they need to address this issue and what they are currently doing in this regard.

Section 1 provides a brief overview of global governance and identifies how it is increasingly defined by the interaction between state and non-state actors. It then maps out how IGOs, TNCs and INGOs are being invested with increasing power both as decision makers and service providers, yet often exercise this power in the absence of adequate accountability mechanisms.

Section 2 engages with current debates on accountability and argues that organisations need to see accountability as a learning mechanism and tool for increased organisational effectiveness rather than as a mechanism of control and discipline; and that for this to be realised, organisations need to be accountable not only to those actors that have delegated authority to them but also to stakeholders that can affect and are affected by their operations. In acknowledging that organisations cannot be accountable to all stakeholders on all issues, this section also outlines what organisations need to think about when prioritising who they engage with and on what issues.

Section 3 introduces the GAP Framework, and presents the four dimensions: transparency, participation, evaluation, and complaint and response mechanisms. It identifies each dimension's unique, independent contribution to accountability then discusses how each underpins and supports the others in generating overall accountability. It then identifies the key conditions that need to be present in an organisation for meaningful accountability to be realised.

Section 4 unpacks each of the dimensions, providing definitions and a brief narrative of how transparency, participation, evaluation, and complaint and response mechanisms can be put into practice to ensure effective accountability. There is also a brief discussion around the key challenges that exist in implementing each of the dimensions.

Section 5 provides guidelines which an organisation can use to start unpacking what accountability means and how it can be achieved.

Section 6 outlines the current state of affairs in each of the three sectors with regards to the four dimensions. It identifies some of the specific accountability challenges faced by each sector and highlights ways in which some organisations are trying to overcome them.

What next for the Accountability Programme?

This publication does not mark the end of a process but the start of more work – both for us and for the organisations that choose to make use of it. We hope organisations that find this publication useful will not regard it as the answer to accountability challenges but rather as a tool that will enable them to develop their understanding of accountability, what accountability means to them and how they can improve it.

At the One World Trust, the GAP guidelines will be used as the basis for future initiatives.

Global Accountability Index

A Global Accountability Index will be generated in the first half of 2006 by collecting information on 30 global organisations. The indicators for assessing these organisations will be based on the guidelines in this publication. The main objectives of the Index are:

• to identify specific areas for improvement within the accountability of the assessed organisations

• to highlight best and worst accountability practices

• to map out the current state of accountability trends and challenges at global level.

Sector and context specific guidelines

The principles of accountability laid out in the framework apply across the IGO, TNC and INGO sector; however, the implementation of accountability mechanisms will vary in different sectors and contexts. The One World Trust will look to develop an understanding of how the guidelines translate within particular sectors and contexts (for example development INGOs, pharmaceutical TNCs, media organisations, etc), in consultation with organisations within those sectors, in order to make them more practical.

'How to' guides

The guidelines within the GAP Framework provoke many questions along the line of 'how do you actually do that?' The One World Trust will look to develop more concrete and practical examples of specific elements of the guidelines in order to enable organisations to operationalise them more effectively. Examples could include: producing terms of reference for participatory processes; drafting a definition of a valid complaint; determining what information to make available; examples of information disclosure policies, etc.

Training and cross-sector learning

The One World Trust will deliver training on accountability and the GAP Framework to IGOs, TNCs and INGOs. It will also convene groups – both within sectors and multi-stakeholder – to further the understanding of accountability and to promote shared learning.

If you are interested in any of these initiatives, would like to become involved, or simply want to find out more details, please contact us at **accountability@oneworldtrust.org**

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Executive Summary

Global governance is increasingly defined by policies and decisions of both state and non-state actors. Intergovernmental organisations (IGOs), transnational corporations (TNCs) and international non-governmental organisations (INGOs) are all engaged in the governance of our collective affairs. They have the power to make decisions and conduct activities that have a profound global impact; yet they currently exercise this power in the absence of adequate accountability mechanisms. In order for global governance to be legitimate and effective these accountability gaps need to be addressed.

The accountability of global organisations is currently inadequate; it is skewed towards the needs and interests of their most powerful stakeholders: IGOs' to member states, TNCs' to shareholders, INGOs' to donors. The key challenge is to create a more balanced accountability where the voices of the most powerful are just one among many and where those most affected by an organisation – oftentimes the most disadvantaged – have a say in the decisions that impact them.

Many organisations shy away from the idea of accountability because they understand it in terms of discipline; that being accountable is about being held to account. Although this is a crucial component, it is not the most important. First and foremost accountability is about engaging with, and being responsive to, stakeholders; taking into consideration their needs and views in decision-making and providing an explanation as to why they were or were not taken on board. In this way, accountability is less a mechanism of control and more a process for learning. Being accountable is about being open with stakeholders, engaging with them in an ongoing dialogue and learning from the interaction. Accountability can generate ownership of decisions and projects and enhance the sustainability of activities. Ultimately it provides a pathway to better performance.

The GAP Framework provides guidance to organisations on how to operationalise this understanding of accountability. It identifies four core dimensions that make an organisation more accountable to their stakeholders: **transparency, participation, evaluation**, and **complaint and response mechanisms**. These enable an organisation to give an account to, take account of, and when necessary be held to account by, stakeholders. To be accountable, an organisation must integrate these dimensions into its policies, procedures and practice, at all levels and stages of decision-making and implementation, in relation to both internal and external stakeholders. The dimensions are connected and impact on each other in multiple ways. While each is necessary for and contributes to accountability, alone none is sufficient.

The GAP Framework is an enabler for accountability, providing the frame in which an organisation can think strategically about to whom and for what it is accountable and how it can realise this. It is a voluntary measure, not a compliance mechanism. For accountability to be realised, the drive for it must ultimately come from within.

For this reason the use of the GAP Framework is prefaced by the need for internal commitment. For the dimensions to be implemented effectively and for organisations and stakeholders alike to reap the full benefits of accountability, a high level of commitment within the organisation at Board and senior management levels is essential. This needs to manifest itself in two concrete ways, through:

• **Embeddedness** – accountability needs to be integrated into everything an organisation does, it cannot be an appendage to its core operations.

• **Responsiveness** – an organisation must respond to stakeholders' concerns and be willing to change when appropriate.

The higher the quality and level of embeddedness of the dimensions the more accountable the organisation is. An accountable organisation is responsive to the needs of key stakeholders while delivering against its mission.

IGOs, TNCs and INGOs are taking steps to increase their accountability; however, few are approaching the issue in a systematic way. The GAP Framework will help organisations bring greater coherence to existing internal initiatives and aid them in identifying how these can be expanded, supplemented and strengthened.

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Why should global organisations be accountable?

Decision-making at levels above that of the nation state is an unavoidable reality. A web of connections binds us globally through trade, finance and communications. Problems such as global warming and spread of disease are global in nature, and require global solutions. The growth in the number and scope of intergovernmental organisations (IGOs) reflects the need for coordinated state action. Yet there is also a growing recognition that states alone cannot respond to such multiple and diverse issues. As a result non-state actors such as transnational corporations (TNCs) and international non-governmental organisations (INGOs) have gained an increasingly important role in the governance of international affairs, contributing their capabilities and providing greater flexibility in addressing issues of global concern.

As a result IGOs, TNCs and INGOs have considerable influence over policies and actions that have a wide-ranging impact on individuals and communities across the world. This dispersal of decision-making power has led to concerns over the legitimacy of decisions made at the global level, and over who takes responsibility to ensure that decisions are not harmful, but beneficial to the ones they affect.

Traditional forms of accountability are no longer appropriate for understanding accountability in the context of multi-level governance. State-based accountability is ill-equipped to provide those influenced by a global or regional decision with an adequate voice in how that decision is made. Other mechanisms have emerged for holding international organisations to account: supervisory (for instance the World Bank is subject to supervision by states), fiscal (funders can sanction recipients of funding), legal (organisations must abide by formal rules), market (investor and customers exercise influence through markets), peer (mutual evaluation from peers such as codes of conduct), and public reputational accountability.[4] Despite these, the complexity and density of the relationships between actors across national, regional and global levels have led to the emergence of a multitude of accountability gaps[5] – fissures between those that govern and those that are governed that prevent the latter from having a say in, and influence over, decisions that significantly impact upon their lives. An accountability gap exists if it can be determined that a group affected by some set of actions has a valid claim on the acting entity, but cannot effectively demand the accountability that it deserves.[6] This inability to demand accountability is exacerbated by power relationships as weak actors lack the capacity to hold powerful actors accountable for their decisions and actions.[7]

The future legitimacy and effectiveness of global governance rests on our ability to address these gaps and to tackle the challenge of meaningful inclusion of stakeholders in the multilateral arena. Mechanisms need to exist which hold IGOs, TNCs and INGOs to account, and new understandings of what accountability means in practice need to be developed.

> "[c]ontemporary global order is increasingly the outcome of multiple, interlocking patterns of transnational interaction shaped both by state and non–state actors"[3]

> Traditional forms of accountability are no longer appropriate for understanding accountability in the context of multi-level governance.

> The future legitimacy and effectiveness of global governance rests on our ability to address these [accountability] gaps and to tackle the challenge of meaningful inclusion of all stake-holders in the multilateral arena.

This section was informed by Blagescu, M. and Lloyd, R. (forthcoming), *Assessing Accountability of Regional Organisations*, in De Lombaerde, P. (Ed) Assessment and Measurement of Regional Integration, Routledge, London.

3 United Nations (2004)
4 Grant and Keohane (2004)
5 Newell and Bellour (2002)
6 Keohane (2002)
7 Grant and Keohane (2004)

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1.1 Intergovernmental Organisations (IGOs)

The mobilisation of civil society, such as the demonstrations outside the World Trade Organisation (WTO) meetings in Seattle in 1999, reflects the realisation that IGOs are performing an increasing range of tasks, which go beyond their original mission, and which affect an increasing number of people. It is not only 'mission creep'[8] that makes it difficult for stakeholders to hold IGOs to account, but also the fact that these institutions are so large that the chain of responsibility is difficult to understand.[9]

Accountability debates in relation to IGOs have focused on the usual suspects, the World Bank, the International Monetary Fund (IMF) and the WTO. Yet many more influential and powerful IGOs have a defining role in shaping the global system, such as the Organisation for Economic Cooperation and Development (OECD), the Bank for International Settlements (BIS), the Multilateral Development Banks (MDBs)[10] and the United Nations agencies. The low level of awareness within civil society about some of these organisations, what they do, and the impacts they have, is an additional cause for concern.

IGOs face accountability demands from different stakeholder groups, and are usually judged against three sets of potentially conflicting measures: whether they serve the interests of member states, whether they serve the purposes for which they were established, and how their impact compares to evolving standards of benefits and harms.[11]

Formally, IGOs are accountable (supervisory and fiscal accountability) to their members – the nation states that fund them and make up their membership. However the power imbalances that exist between members mean some nations have more influence and can demand more accountability than others. For instance, it is estimated that the developed countries make up 15 percent of the world's population, yet account for over 60% of voting strength in the World Bank and the IMF.[12] Given that power is often related to the amount of resources provided by members, industrialised countries are the main shareholders of IGOs and exercise decisive influence on important policy issues compared to other stakeholders.[13] The inequity of this situation is exacerbated further in cases where the less powerful states also lack the capacity to participate and effectively present their views within the decision-making processes.

Additionally, citizens are unable to engage effectively with IGO decision-making structures, primarily because of the disconnect between constituencies, elected representatives and foreign policy decision-making.[14] Elected representatives do not play an effective role at the national level in holding governments to account for their actions at IGOs, and the vast majority of IGOs (except for example NATO and the European Union) have no formal mechanism for democratically elected representatives to participate in decision-making at the global level. There is therefore no adequate route for citizens

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8   Einhorn (2001)
9   Woods (2003)
10 The Multilateral Development Banks are: World Bank, European Bank for Reconstruction and Development (EBRD), Asian Development Bank (ADB), African Development Bank (AfDB), Inter-American Development Bank (IDB).
11 Grant and Keohane (2004)
12 Helleiner (2001) quoted in WCSDG (2004)
13 WCSDG (2004)
14 The One World Trust also promotes greater accountability of governments to national parliaments in relation to their actions at the global level. For information on the Parliamentary Oversight Project, which aims to enhance oversight of UK external policy by the British Parliament, please go to **www.oneworldtrust.org/pop**

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to participate in decisions taken by these organisations, highlighting a lack of accountability to external stakeholders, particularly to those who are most affected by the decisions of IGOs.

IGOs are subject to accountability claims from many. Their decisions are often not accountable to external stakeholders, but are accountable to their members. The accountability of IGOs is not balanced, it does not meet the needs of those it impacts, but is strongly skewed towards powerful member states.

1.2 Transnational Corporations (TNCs)

Globalisation, deregulation and liberalisation have resulted in the increased power of TNCs and their growing influence over activities which were traditionally the preserve of nation states. This has intensified as the number, scope and activities of TNCs have developed. The primary power of TNCs comes from their financial size and economic leverage. This enables them to engage in the political arena – lobbying with respect to regulation and licenses, and supporting political parties – and gives them a degree of leverage over countries seeking their investment.[15] Both the decisions and actions of TNCs can have huge impacts on a large number of people.

An extensive debate exists about where the responsibility of business lies, and to which stakeholders it should be accountable: only shareholders, or more broadly, those stakeholders that it affects? If it is accepted that business has a responsibility to a wider range of stakeholders, then how far does this responsibility extend? Businesses face multiple calls for accountability – from shareholders, employees, suppliers, financiers, contractors, customers, government, the general public, groups affected by operations, peers – many of which compete or even conflict, and which must be balanced.

The primary accountability mechanisms for TNCs remain national regulatory requirements. The standards set by these regulations vary but, in general, protect only the interests of certain stakeholders; for instance, investors and creditors (financial reporting requirements), workers (labour standards), consumers (product safety standards) and the general public (e.g. environmental impact legislation). Although they remain a critical accountability mechanism for TNCs the spread of globalisation has weakened states' ability to intervene and enforce such regulations. This has exacerbated the accountability gaps between citizens and corporations.[16] A number of international standards also apply which relate to, or have implications for, TNC accountability, although they are generally non-enforceable. These include the UN Declaration on Human Rights (1948), the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (1977), Agenda 21 and the Rio Declaration (1992), the OECD Guidelines for Multinational Enterprises (1961, revised 2000), and the Aarhus Convention (1998).

In addition to regulatory accountability mechanisms, TNCs are also accountable through other mechanisms to their peers, customers and investors. Increasingly, groups of businesses are developing self-regulation mechanisms or codes of conduct relating to certain issues, therefore encouraging peer accountability, e.g., the Worldwide Responsible Apparel Production Principles. Consumers have also played an important role in holding TNCs to account. Their influence has

The accountability of IGOs is not balanced, it does not meet the needs of those it impacts, but is strongly skewed towards powerful member states.

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15 Newell and Bellour (2002)
16 Keohane (2002)

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been particularly strong where a TNC has a high profile brand and reputation to protect. Both institutional and individual investors are becoming more aware of their influence over TNCs and are taking into consideration social and environmental factors when making their investment decisions.

Therefore, although at the national level TNCs are subject to domestic supervisory and legal accountability, at the global level, in the absence of effective international regulation, their accountability is limited to market, reputational and peer accountability.[17] These acountability mechanisms that do exist are imposed by more powerful stakeholders (investors, customers, peers) at the expense of less powerful ones, such as affected communities. Many contend that there is an asymmetry between business rights and responsibilities; that the balance of regulation of business, versus the regulation for business, is wrong.[18] Whilst many externally and internally imposed initiatives attempt to address this deficit, they are mainly voluntary and cannot fill the gap. TNCs can ignore them, they cannot be enforced, and, when developed by business, they are prone to exclude important stakeholders from decision-making processes. More effective accountability mechanisms for TNCs are necessary.

> Many contend that there is an asymmetry between business rights and responsibilities; that the balance of regulation of business, versus the regulation for business, is wrong.

1.3 International Non-Governmental Organisations (INGOs)

INGOs' power stems from both their ability to influence policy and the direct impact they have through their field operations, particularly on the poor. Perceived as having a moral legitimacy to speak on behalf of the less powerful, INGOs have become adept at mobilising the media and generating public support for their causes. From trade justice to environmental protection, they have come to exert a growing influence at the international level, shaping the policies and setting the agendas of a number of global organisations. At the same time INGOs have also taken on a growing number of state-functions providing a range of services in many developing countries from health care to water provision. It is estimated, for example, that INGOs now deliver more development aid to beneficiaries than the entire UN system.[19] The growth in the scope of INGOs' activities and the increasing power they wield in the international arena has given rise to concerns about their accountability.

INGOs' primary accountability is often to governments and institutional donors – those that provide them with legal and financial base.[20] All INGOs, for example, have to comply with the legal and regulatory frameworks of the countries in which they operate while similarly all have contractual obligations to their funders to spend designated money for agreed purposes.[21] The leverage that both governments and institutional donors have over INGOs ensures the responsibilities between them and the INGO are generally clear and the mechanisms for ensuring accountability strong.

INGOs' accountability downwards – to their beneficiaries/clients/constituents, those that they provide services to or speak on behalf of in policy forums;[22] inwards – to their organisational mission, values, members/supporters and staff; and horizontally – to their peers, lack clarity and

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17 Grant and Keohane (2004)
18 Newell and Bellour (2002)
19 The Economist (1999)
20 Edwards and Hulme (1996)
21 Najam (1996)
22 *Ibid*

strength. Beneficiaries generally lack the power to make demands of INGOs and, as a result, the accountability relationship with them is often weak. Rather than being grounded in contract or law, INGOs' accountability to their beneficiaries is shaped by a moral obligation that is generally rooted in their organisational mission and values. A moral obligation provides significant scope for organisational choice and interpretation. As a result, the degree to which INGOs are accountable to their beneficiaries and the quality of the mechanisms they use to ensure this varies considerably from organisation to organisation. The responsibility that INGOs owe to their peers also lacks clarity. Although this should be high in order to uphold the reputation of the sector, norms and standards around what constitutes good practice are often underdeveloped.[23] However, a growing number of NGOs are beginning to take this issue onboard and are negotiating common standards through codes of conduct.

It is therefore misleading to claim, as some commentators have, that INGOs are unaccountable[24] as this suggests that they operate in a void of checks and balances. INGOs are accountable; their problem is that their accountability is skewed towards the most powerful stakeholders. The result of this is that the legitimacy and accountability of INGOs becomes disconnected; legitimacy is based on speaking for disadvantaged people, but INGOs focus on being accountable to donors.[25] Recently, INGOs have been scrutinising their relationships to donors and affected communities, trying to bring them in line; yet the still varying degree of influence that these two groups have on INGOs makes improving accountability mechanisms difficult.

Beneficiaries generally lack the power to make demands of INGOs and, as a result, the accountability relationship with them is often weak.

23   Brown et al (2004)
24   *The Economist* (1999)
25   Keohane (2002)

The increased power of global organisations (IGOs, TNCs and INGOs) has not been matched with the development of effective and comprehensive accountability mechanisms. There is an increasing recognition of this fact both by organisations themselves and by other external actors, resulting in significant pressure for change. Although new accountability mechanisms at the global level cannot be built overnight, organisations can start to take more responsibility for the way that their decisions affect individuals and communities around the world. A failure to deal with the issue of accountability will lead to problems, whereas dealing with it proactively will provide a number of benefits.

Increased accountability within global organisations is likely to produce better policy outcomes. The sense of ownership that is created through effective accountability mechanisms leads to more relevant decision-making and ultimately to better implementation. Genuine involvement of stakeholders in the decision-making process is likely to lead to policies that will respond to the needs of those they will affect. Decisions will be implemented and sustainable if a consensus exists around them.

...accountability gaps need to be addressed because of citizens' inherent right to input into the decisions that impact upon their lives.

Finally, accountability gaps need to be addressed because of citizens' inherent right to input into the decisions that impact upon their lives. As the world becomes more interconnected and as a greater number of policies are decided at the regional and global levels, so we need to adjust our understanding of citizenship to reflect this.

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Shifting the debate: new understandings of accountability

Accountability is a nebulous concept subject to multiple interpretations and understandings: it means different things to different people. According to traditional conceptions, an accountability relationship exists when a principal delegates authority to an agent to act in their interests. Central to this view is that only those with formal authority over an agent – those that have delegated authority to it – have the right to claim accountability. This approach is often used to conceptualise the accountability relationship between politicians and the electorate, or company directors and shareholders. Within this traditional view, holding an agent to account requires clearly defined roles and responsibilities, regular reporting and monitoring of behaviour against these roles, and the ability for principals to impose sanctions for breaches of responsibilities. Accountability is largely seen as an end stage activity where judgement is passed on results and actions already taken.

This understanding is too narrow; accountability needs to be more encompassing if it is to ensure organisations are truly answerable to those they affect. Given that the impacts of an organisation's actions are often diffuse, responsibility should be so too. Accountability should not be determined by delegation of authority alone. Although an individual may not have delegated authority to an organisation to act in their interest, the activities of the latter may impact substantially on them, enough to warrant the establishment of an accountability relationship. This view of accountability emphasises that organisations have to respond to the needs of many stakeholders. This view also emphasises that accountability is more than an end-stage activity. To ensure that an organisation is responsible for its actions, relevant stakeholders need to be involved at every stage of the decision-making process. Passing judgement after a decision is made limits the extent to which an organisation can be accountable. Accountability needs to be an ongoing, changing process.

Understanding accountability in this way extends the limits of the concept beyond its role as a disciplinary mechanism and towards its use as a transformative process. An organisation that is accountable to multiple stakeholders not only ensures that decisions are effective in meeting the needs of those it affects, but also that decision-making processes are more equitable. This more open and participatory approach unlocks the potential of accountability as an agent for organisational learning. Accountability that is pursued on an ongoing basis opens up space for those affected by an organisation's policies to input into the decision-making process. This in turn creates feedback loops that enable organisations to learn from what is effective and what is not. When understood on these terms, accountability is no longer simply a mechanism for disciplining power, but also a force for organisational change and for strengthening organisational performance. Clearly, accountability's effects are not only beneficial to stakeholders, but also to organisations themselves.

Given that the impacts of an organisation's actions are often diffuse, responsibility should be so too. This view of accountability emphasises that organisations have to respond to the needs of many stakeholders.

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2.1 The GAP definition of accountability

Based on this understanding, in the context of the GAP Framework accountability refers to

the processes through which an organisation makes a commitment to respond to and balance the needs of stakeholders in its decision-making processes and activities, and delivers against this commitment.

A key part to this definition is the notion of balance. Today's global governance arena is not defined by unaccountable organisations, but by organisations that are either accountable to the wrong set of stakeholders or focus their accountability on one set of stakeholders at the expense of others. The key challenge is in creating a more balanced accountability, in which the voices of those most affected by an organisation's activities are not overshadowed by the interests of the most powerful stakeholders. Accountability thus becomes a process that manages power imbalances between the organisation and its stakeholders as well as between an organisation's various stakeholder groups.

2.2 Who are the stakeholders?

The concept of stakeholder is central to the understanding of accountability and underpins the entire GAP Framework. Stakeholders are

individuals and groups that can affect or are affected by an organisation's policies and/or actions.[26]

Although this definition is similar to the traditional understanding of stakeholder (groups or individuals who have a 'stake' in the organisation), it contains an important nuance. It recognises that the actors who influence an organisation are often different from those who are affected by it.

Within the context of the GAP, distinctions are made between two different types of stakeholders: internal stakeholders – individuals or groups that are formally a part of the organisation, and external stakeholders – individuals or groups who are affected by an organisation's decisions and activities but who are not formally part of the organisation. Of the internal and external stakeholders, the organisation needs to identify key stakeholders – those who significantly influence or are significantly influenced by an organisation and/or are integral to an organisation's or project's success or failure.

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26 Note that not all individuals and groups who may have knowledge of, interest in, or views about an organisation are included in this definition of stakeholder.

	IGOs	TNCs	INGOs
Internal stakeholders	Members Employees Board of Directors	Shareholders Employees Board of Directors	National members/chapters Employees Trustees
External stakeholders	Recipients of loans, aid or grants Contractors Partners Other affected groups or individuals Peer IGOs	Suppliers Customers Contractors Financiers Partners Trade unions Other affected groups or individuals Government Peer TNCs	Funders Supporters Beneficiaries Other affected groups or individuals Partners Government Peer INGOs

In seeking to balance accountability to different stakeholder groups, an organisation must recognise that stakeholders have an interest in its success or failure and each will have the ability to help or hinder its activities. In exercising their agency, each stakeholder has:

• Different capacity: resources (particularly financial), knowledge and expertise

• Different degrees of access to reliable information

• Different needs and expectations.

These differences will manifest themselves in different levels of power and influence and give rise to the unbalanced accountabilities discussed above. They are often compounded by the fact that organisations will have vested interests in certain sets of stakeholders as well.

2.3 Accountable to whom and for what?

Organisations need to prioritise both the issues on which they engage stakeholders and the stakeholder groups that they engage. It is unrealistic to expect an organisation to be accountable to all its stakeholder groups for all issues: this would lead to accountability paralysis.

An organisation must first determine on which issues it must engage. To determine this, it needs to work from a combined understanding of who its stakeholders are, the impacts the organisation has on its stakeholders, and the impact stakeholders have on the organisation. Developing this understanding is an iterative process as the understanding of one will inform the other: looking at stakeholders will increase understanding of impacts, and looking at activities and impacts will increase understanding of stakeholders.

Organisations need to prioritise both the issues on which they engage stakeholders and the stakeholder groups that they engage.

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For each engagement organisations need to prioritise their stakeholders and be clear about the ways in which they are accountable to them. The starting point of this is a stakeholder analysis, of which the purpose is to:

• Identify key stakeholders and define their interests and characteristics

• Assess the manner in which stakeholders might affect or be affected

• Understand the relations between stakeholders, including the real or potential conflicts of interest and expectation between them

• Assess the capacity of different stakeholders to participate.

The prioritisation of stakeholders should take into account **influence, responsibility** and **representation:**

Influence

Influence is about more than how much power stakeholders have to bring about change within an organisation (those that 'can affect'). It is also about the needs and interests of stakeholders who 'are affected by an organisation's policies and/or actions' but do not have the power to influence the organisation. Ensuring that these stakeholders have influence in the process is integral to the overall accountability of an activity/organisation and ultimately its success. Failure to view influence in this way will have adverse effects by reinforcing already skewed accountability systems towards those stakeholders with power, at the expense of those less powerful but affected by an organisation.

Responsibility

An organisation has different levels and types of responsibility to different stakeholders.

• *regulatory responsibility* to the state to comply with certain regulations

• *contractual or legal responsibility* to other organisations or partners

• *financial responsibility* to donors or shareholders, to ensure their money is used in the agreed way

• *ethical or moral responsibility* to stakeholders, either because they are directly or indirectly dependent on the organisation and affected by it; or because they are integral to the organisation's mission, vision and values.

Representation

This encompasses the legitimacy of a representative (i.e. the extent to which a stakeholder truly represents its constituents needs and interests), and the number of constituents that it represents.

Through engaging in this process an organisation can understand what its impacts are, who it affects and how, and use this understanding to inform the best use of resources in achieving accountability. Critically, the relationship between an organisation and its stakeholders is not static, but ongoing and continuously changing. For instance, although some stakeholders are easy to identify and remain as such for long periods of time, other groups shift depending on the work being undertaken and the stage of a project. Consequently for what and to whom an organisation is accountable also evolves.

The relationship between an organisation and its stakeholders is not static, but ongoing and continuously changing... [therefore] for what and to whom an organisation is accountable also evolves

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The GAP Framework

The GAP framework unpacks accountability into four dimensions: **transparency, participation, evaluation**, and **complaint and response mechanisms.** To be accountable, an organisation needs to integrate all these dimensions into its policies, procedures and practice, at all levels and stages of decision-making and implementation, in relation to both internal and external stakeholders. The higher the quality and embeddedness of these in an organisation's policies, processes and procedures, the more accountable the organisation will be.

Transparency

Transparency refers to an organisation's openness about its activities, providing information on what it is doing, where and how this takes place, and how it is performing. This constitutes basic information necessary for stakeholders to monitor an organisation's activities. It enables stakeholders to identify if an organisation is operating inside the law, whether it is conforming to relevant standards, and how its performance relates to targets. In turn, this enables stakeholders to make informed decisions and choices about the organisation.

Transparency also strengthens an organisation's accountability indirectly. A transparent organisation provides stakeholders with the information they need to participate in the decisions that affect them. Without access to all the relevant information regarding an activity or decision it would be difficult for stakeholders to participate meaningfully in its development.

Participation

To be accountable, an organisation needs to understand the needs and interests of its stakeholders. This is best achieved if the organisation engages with its stakeholders and develops a participatory approach to decision-making. It needs to establish mechanisms that enable stakeholders to input into decisions that affect them. This may require engagement at the operational level, the policy level and/or the strategic level. An organisation committed to accountability must enable stakeholders' input into the broader organisational policies and strategies and not confine engagement to operational issues.

To strengthen accountability, participation must lead to change; it has to be more than acquiring approval for, or acceptance of, a decision or activity, or of including stakeholders in the implementation and evaluation of that decision. Stakeholders must have a say in how the decision is taken and what decision is made. In this regard, participation for accountability is intimately bound with issues of power. There is no escaping the fact that a degree of power needs to be ceded to stakeholders in order for an organisation to be accountable.

Evaluation

Evaluation is another essential component for achieving accountability. It ensures that an organisation is accountable for its performance, that it is achieving its goals and objectives, and meeting agreed standards. Evaluation allows organisations to indicate to stakeholders what they have achieved and what impact they have had, but also allows stakeholders to hold organisations to account for what they said they would do.

The relationship between evaluation and accountability centres on learning. The evaluation process and the results that emerge from it can inform ongoing activities and future decision-making, providing the information that will allow an organisation to improve its performance, thus making it more accountable to its mission, goals and objectives.

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Complaint and response mechanisms

Enabling stakeholders to seek and receive response for grievances and alleged harm is a critical aspect of accountability. This is the mechanism through which stakeholders can hold an organisation to account by querying a decision, action or policy and receiving an adequate response to their grievance. Transparency, participation and evaluation processes should be used to minimise the need for complaint mechanisms. Complaints and response mechanisms should be seen as a means of last resort for stakeholders to hold the organisation to account and for organisations to become aware of an issue that requires a response.

Each of these dimensions are necessary for accountability, while alone none are sufficient. Meaningful accountability only results when all four are effective.

Each of these dimensions are necessary for accountability, while alone none are sufficient. Meaningful accountability only results when all four are effective. For example, an organisation may be very transparent about its activities but, unless it creates the channels through which stakeholders can use the information it provides to actually input to and influence decisions, it is not fully accountable. Similarly, if an organisation provides mechanisms for stakeholders to file complaints, but then does not have evaluation processes in place that feed lessons from these mistakes into future decision-making to ensure learning, it is not fully accountable.

3.1 Proactive and reactive elements of accountability

A combination of mechanisms make an organisation accountable: some will proactively improve accountability, others will react to calls for accountability. An organisation's commitment to accountability can be weighted depending on whether it focuses more on being proactive or reactive; for instance, if it expends considerable resources addressing problems that have occurred and dealing with adverse publicity, it is being reactive. If, on the other hand, it involves stakeholders in projects prior to and throughout their implementation, it is being proactive.

An organisation must take a proactive approach to accountability, but also have reactive mechanisms in place. The GAP Framework incorporates both proactive and reactive approaches to accountability.

Transparency and participation interlink to create a proactive approach to accountability. They shift the emphasis from accountability as an end-stage activity to an ongoing process. Organisations that embrace this approach are constantly providing stakeholders with information and engaging with them in decision-making and policy formulation before they take place. This creates a relationship between the organisation and its stakeholders that is more dynamic, receptive and responsive.

The role of evaluation in relation to the framework is more fluid. It is a mechanism for both understanding successes and failures, and for feeding lessons into future decision-making. This understanding of evaluation supports a proactive approach to accountability. It also plays a reactive role in reporting on performance.

Complaint and response mechanisms and, in some situations, evaluation reflect a reactive approach to accountability; they support an understanding of accountability in which outputs and/or decisions are assessed after they occur. A reactive organisation will only change its policies and practice in response to a complaint or once an evaluation has revealed poor performance.

Although important, reactive accountability is about responding to judgement after a decision is made or policy is implemented. It limits the extent to which an organisation can be responsive to stakeholders.

Although the proactive and reactive approaches are complementary, organisations need to emphasise the former to ensure a form of accountability conducive to learning. Any organisation that chooses to take a purely reactive approach will undoubtedly experience unnecessarily high costs as projects and policies progress to advanced stages before stakeholders' concerns are heard.

3.2 The accountability web

Although each dimension – transparency, participation, evaluation, and complaint and response mechanisms – is independently important to increasing accountability, its contribution is significantly strengthened through its interaction with the others. The dimensions underpin each other in a web of mutually reinforcing linkages.

Increased accountability

Transparency
The provision of accessible and timely information to stakeholders and the opening up of organisational procedures, structures and processes to their assessment

Complaint & response mechanisms
Mechanisms through which an organisation enables stakeholders to address complaints against its decisions and actions, and ensures that these complaints are properly reviewed and acted upon

Participation
The process through which an organisation enables key stakeholders to play an active role in the decision-making processes and activities which affect them

Evaluation
The process through which an organisation monitors and reviews its progress and results against goals and objectives; feeds learning from this back into the organisation on an ongoing basis; and reports on the results of the process

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Although each dimension exists independently of the others, the four overlap and intersect in multiple ways. Where there is overlap, there is strengthened accountability. For example, an evaluation process underpinned by openness and transparency is more likely to increase organisational accountability than one that is conducted in secrecy. Similarly, an evaluation that engages key stakeholders in the process of assessing performance and is open about its findings will contribute more to accountability than one that does not. The more overlap there is between the dimensions, the more accountable the organisation becomes.

For each of the four dimensions a policy needs to be in place that sets the objectives for the delivery of that dimension. How, and at what levels these are set, have a considerable impact on accountability. To ensure the objectives reflect a diversity of interests and needs, and thus are reflective of an organisation's multiple stakeholders, they need to be developed with the participation of these stakeholders.

Likewise, to ensure meaningful accountability, an organisation's policies and processes need to be transparent in their operation and execution. The entire evaluation process, for example, from planning, to monitoring, to communicating results, to feeding them back into decision-making; all this needs to be undertaken in an open manner to enhance the ability of stakeholders to view and input into the process. The same goes for the complaint and response mechanism. All of its elements need to be transparent. Likewise for participation: whenever a stakeholder analysis is undertaken, the results must be made available, reasons for non-engagement must be explained and outcomes of the engagement process must be reported back to stakeholders.

Elements of evaluation also need to be integrated into each dimension. The relationship between an organisation and its stakeholders is dynamic in nature. As an organisation branches out into new activities or undertakes new projects, its stakeholders will change. It is therefore crucial that accountability mechanisms evolve and adapt in parallel through evaluation and learning. For example, in identifying a new set of stakeholders, an organisation might have to change the way it discloses information, or may have to rethink its complaint and response mechanism. This continual adaptation is the key for accountability mechanisms to remain relevant to the stakeholders that use them and to the organisation that will learn from them.

An element of the complaint and response mechanism needs to be reflected in each of the other dimensions as well. Processes need to be in place that allows stakeholders to raise concerns. For example, stakeholders should be able to file a complaint if they feel they have been unfairly excluded from an engagement process or, having participated, they feel that their concerns have not affected the decision. Moreover, as part of any transparency policy, there should be a procedure in place that allows stakeholders that have been denied access to information to make an appeal.

3.3 Key conditions for accountability

What have been outlined so far are the key dimensions to organisational accountability: what an organisation needs to do to become more accountable to its stakeholders. However, for these mechanisms to be effective and for organisations and stakeholders alike to reap the full benefits of accountability, an essential condition needs to exist: **organisational commitment to accountability.** An organisation must want to be accountable. Although this may seem self-evident, it cannot be stressed enough. Ultimately, the degree to which an organisation is

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committed to accountability will determine the quality of the accountability mechanisms it puts in place and of the reforms it undertakes to increase its accountability.

Commitment needs to be entrenched at the highest level of an organisation, both at the Board and senior management level. Without the will of those in positions of power, there is little chance that accountability reforms will take hold; and even if they do, without high level commitment, they will only ever be piecemeal, implemented in relation to individual projects, but never integrated into organisational structures and processes. Crucially therefore, senior managers and the Board must be committed to accountability.

To be effective, accountability must also be entrenched in everything an organisation does, from its finances, to its operations, to its human resources. Commitment therefore also needs to cut across departments. If an INGO makes the decision to strengthen its accountability to beneficiaries, for example, this might require the fundraising teams changing how they report to donors, finance departments learning how to communicate financial information to people that are illiterate, and campaign teams developing mechanisms that give the poor and marginalised a direct voice in international advocacy.

For accountability to be realised, there are two concrete ways in which commitment needs to manifest itself: in the form of **embeddedness** and **responsiveness.** Firstly, accountability mechanisms need to be embedded in all an organisation's processes and procedures, at all levels of decision-making. For accountability to be effective it cannot be just an appendage to an organisation's core operations; it needs to be integrated into everything it does. On a practical level, this will require that the policies for each of the dimensions be disseminated at all levels of management; that there is a clear understanding within the organisation as to the benefits and importance of accountability; and that appropriate incentives and sanctions exist to ensure staff compliance with new practices and procedures. Crucially, this will also require the necessary resources being made available. Accountability is not a costless activity. It requires both money and training for reforms to be effectively implemented and sustained. Systems need to be built, for example, that enable organisations to engage with and respond to stakeholders, while staff need to be trained in how to facilitate this process. Without the necessary resources, accountability mechanisms will not be effective.

Secondly, an organisation's commitment to accountability must be reflected in its responsiveness to stakeholders' concerns and needs, and its willingness to adjust policies when necessary. This requires an organisation to address the power imbalance between itself and stakeholders. This should not be mistaken as a call for allowing stakeholders total power in decision-making, but as one for the need of increased respect and recognition that stakeholders also have capacity and expertise that is valuable to the organisation. There needs to be a commitment from organisations to listen to their stakeholders when making decisions, to change policies and activities when appropriate and when not, to explain why.

Commitment and success are mutually reinforcing; they interact to produce virtuous or vicious cycles. Once an organisation is committed to the accountability agenda, for example, it is more likely that the necessary resources will be made available, that accountability reforms will be widespread, that the organisation will be responsive to stakeholders' needs and that this will lead to improved performance. Similarly, if there is a lack of commitment, the necessary resources will be lacking, reforms will be piecemeal, receptivity to stakeholders will be low and the impact on performance will be more limited.

For accountability to be realised, there are two concrete ways in which commitment needs to manifest itself: in the form of embeddedness *and* responsiveness.

For accountability to be effective it cannot be just an appendage to an organisation's core operations; it needs to be integrated into everything it does.

An organisation's commitment to accountability must be reflected in its responsiveness to stakeholders' concerns and needs, and its willingness to adjust policies when necessary.

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Ultimately, for accountability to be realised it needs to become integrated into the culture and core practices of an organisation. It needs to become ingrained in the organisational values and norms. If an organisation has commitment at the highest levels and if this is manifested in the ways described above, there is a high likelihood that accountability will develop.

The Accountable Organisation

An accountable organisation takes proactive and reactive steps to address the needs of its key stakeholders while delivering against its mission.

- It is transparent in both its activities and decision-making processes, engaging in ongoing dialogue with key stakeholders over the information they need to make informed decisions

- It engages its key stakeholders in its decision-making processes related to policies and practice

- It evaluates performance, policies and practice in consultation with its key stakeholders. It learns from and reports on the outputs of these evaluations

If an organisation manages to do this it will increase its accountability to key stakeholders. Yet, should it fail to deliver on any of these points,

- It has channels through which stakeholders can voice their grievances and receive an appropriate response.

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This section provides definitions for each of the dimensions (transparency, participation, evaluation, and complaint and response), a narrative of how they need to be operationalised to ensure effective accountability, and a brief discussion around the key challenges that exist in implementation.

4.1 Common elements

The starting point for each dimension is the organisational policy (the substance of the policy) and organisational capacity (the capacity of the organisation to implement the policy effectively). There are certain basic elements which relate to organisational policy and capacity for each dimension. These are presented here, rather than detailed in the following narrative which covers points specific to each dimension.

Development of the policy:
- The dimension policy must be developed in consultation with stakeholders, to ensure it meets the needs of those who will be using, and benefiting from, it.

Governance:
- The Board assigns responsibility for oversight and implementation of policy to a member of senior management, and responsibilities are cascaded throughout the organisation as appropriate.

- Evaluations of the policy are conducted on a regular basis by engaging stakeholders to enable the organisation to respond to their needs and tailor its practices and techniques according to these needs.

- A process exists which allows stakeholders to appeal when they feel they have wrongly been denied access to a specific mechanism.

Resources:[27]
- Adequate resources are assigned for the implementation of the policy throughout the organisation, which covers staff time and operational costs.

- Appropriate training is provided for relevant staff throughout the organisation.

Accessibility:
- Information on the policy is actively disseminated to key stakeholders, and available to them in a clear and easily understandable manner in appropriate forms and through appropriate media.

User friendliness:
- No relevant stakeholder is excluded from the accountability mechanism due to inability to understand the terms and conditions of the policy or of any given process.

- No relevant stakeholder is excluded from the accountability mechanism due to lack of physical access or communication barriers (language or expert terms).

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27 Organisations need to develop core resources to deal with accountability-related expenses effectively. For smaller organisations that are heavily dependent on project funds, this needs to be included in project budget.

4.2 Transparency

Within the context of the GAP framework transparency is

the provision of accessible and timely information to stakeholders and the opening up of organisational procedures, structures and processes to their assessment

A central tenet of transparency is information provision. To be transparent, an organisation must be open with its stakeholders about activities and performance, providing basic information to them on what it is doing and how well it is doing it. Organisations need to make public financial statements, annual reports and evaluations, as the basic information needed by stakeholders to monitor an organisation's activities.

To be transparent an organisation must do more than simply disclose standardised information: it needs to provide stakeholders with the information they require to make informed choices and decisions. The disclosure of large amounts of information, which does not fulfil stakeholders' needs, will have a limited impact on the organisation's transparency. In this way, transparency is more than just a one-way flow of information: it is an ongoing dialogue between organisation and stakeholders over information provision. Failure to recognise this will undermine the role of transparency in strengthening organisational accountability.

A transparent organisation must ensure that information is both understandable and accessible to stakeholders. It must be provided in a language they can understand and a format that they can use. For example, World Bank project documents that are crucial to an Indonesian community will be useless to them unless they are translated into Bahasa and made available in print rather than on the web. Likewise, an INGO that works with the poor may have to take on the responsibility of communicating information in a way that enables those that are illiterate to understand it. To be meaningful the information provided must also be timely. One of the key purposes of transparency is to facilitate stakeholder participation; for this to occur, information is needed before a decision is made, not after.

Yet transparency is more than just flow of information and relates more broadly to organisational openness. A transparent organisation is one that opens up its inner workings to stakeholders and their influence; this openness relates specifically to decision-making structures. The processes through which decisions are made from the operational, to the policy, to the strategic levels are open to input from key stakeholders. This area overlaps with participation, in that a transparent organisation is essentially one that is open to stakeholder input.

Effective transparency

Firstly, and most importantly, to ensure meaningful and consistent transparency an organisation must have a transparency policy in place. Without this, information disclosure is largely arbitrary as individuals within an organisation will have too much discretion over what to disclose. This creates unpredictability in information flow. With a formal policy in place all decisions on information provision are objective.

Organisations need to proactively disclose certain types of information. This must include information on what the organisations is doing, (where, when, for how long, with how much money and who is responsible), financial information detailing income and expenditure disaggregated

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To be transparent an organisation must do more than simply disclose standardised information: it needs to provide stakeholders with the information they require to make informed choices and decisions.

...transparency is more than just a one-way flow of information: it is an ongoing dialogue between organisation and stakeholders over information provision.

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according to individual departments and units, a clear description of organisational structure and how decisions are made. All this provides stakeholders with the basic information necessary to monitor what an organisation is doing, how well it is doing it and the impact it is having. It should form the basis for any organisation's approach to transparency and provide a springboard for more specific information requests by stakeholders.

Through the policy, the organisation must make a commitment to the release of information in the absence of a compelling reason not to disclose. This puts the onus on the organisation to justify non-disclosure rather than stakeholder groups having to make the case for disclosure.

Transparency enables stakeholders to input into decisions. A transparent organisation is open about how it makes decisions and how stakeholders can input into these. It discloses outputs from, records of and information that informed its decision-making process.

Key challenges to effective transparency

Privacy

Organisations have the right to withhold certain information. In some situations, disclosure of certain types of information may actually pose a security risk. For example, human rights NGOs that operate in high risk environments could compromise the safety of those that have reported human rights abuses if they were entirely transparent. Corporations, on the other hand, could undermine their competitiveness if they were forced to disclose information on their market entry plans or innovations. With regards to information on third parties, all organisations have an ethical obligation to maintain privacy.

Although organisations need to keep some information confidential, it is crucial that privacy claims are not used as a cover for a broader lack of organisational transparency.

Contractual confidentiality

Although confidentiality clauses and contractual agreements should be maintained, these should not be used to undermine openness at the expense of public interest. When TNCs have signed confidentiality clauses over payment data in their licensing agreements with host governments, for example, these payments often become the source of corruption in much of the developing world, with many "millions of people dependent on the proper management of these revenues for their welfare."[28] In cases such as these, the benefits to the public interest might far out-weigh the harm that the disclosure would bring to the companies in question. In some instances, such disclosure has actually helped companies. The example of BP is a case in point. Their unilateral decision to disclose payments made to the Angolan government in 2000, which was considered a high risk strategy at the time, paid off in both increased stakeholder respect, and in opening up of the global debate around payments to governments.

Exposure to risk

Some organisations fear that greater transparency may lead to exposure to risk. In the INGO sector, for example, there is a fear that disclosure of financial information might lead to stakeholders making misleading comparisons across organisations regarding administrative costs.[29]

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28 Publish What You Pay
29 Cardy (2005); Demopoulous (2005)

INGOs believe that they run the risk of donors, both individual and institutional, misinterpreting their administration/expenditure ratio as a sign of inefficiency and thus withdrawing their support. Although this is a real concern, rather than being a problem of too much transparency, it is actually a symptom of too little. The reason why stakeholders could misinterpret the data in the first place is because INGOs have not been open enough about how they use resources in the pursuit of their mission. Organisations in the non-profit sector in general have not taken the time to effectively communicate to stakeholders why they need to channel resources into non-operational costs such as fundraising, staff capacity building, etc, and how integral this is to their work. This highlights that organisations need to think very carefully about the information they disclose and how this might be understood by stakeholders. In order to prevent misinterpretation and hence reduce risks, organisations may actually need to communicate more in order to provide a context and help explain the information's meaning and potential use.

Transparency around performance also has the potential of being problematic. INGOs, for example, might resist greater disclosure in this area for fear that evaluations that reveal failings might compromise funding. Similar concerns have been raised in the corporate sector but TNC experiences have shown transparency actually generates trust with the public. In the case of INGOs however there is also an obligation on donors to create a more conducive environment for such openness. They need to reassure organisations that it is acceptable to be open about failure, and therefore provide the space for organisations to learn.

4.3 Participation

In the context of the GAP framework, participation is

> *the process through which an organisation enables key stakeholders to play an active role in the decision-making processes and activities which affect them*

The term participation can be used to mean different things in different contexts. To give two extremes, a person can be said to participate by the very fact of agreeing to interact with an organisation, such as coming to meetings but remaining silent; or through participating in the governance of a project or organisation by providing input into organisational objectives and setting the criteria by which project success might be measured. Participation in the context of the GAP Framework refers to active engagement of stakeholders in decision-making.[30] The defining factor here is that participation must allow for change. There is no point consulting or involving others if it makes no difference. Participatory processes need to be tied in closely to systems of power, influence and decision-making.

It is important to highlight that, given the number and variety of stakeholders affected by a decision, it would be unrealistic to expect an organisation to engage with them all; or to expect that all stakeholders can have an equal say in decision-making processes. Within this definition, greater or lesser participation of the various stakeholders can occur at various stages in the decision-making process and activities of an organisation. However, the organisation must have clear guidelines enabling it to prioritise stakeholders appropriately and to be responsive to the difference in power between them. Some representation at all levels and stages in the decision-making and implementation process is essential. Mechanisms need to be in place to ensure that the most affected and marginalised groups are represented and have influence.

Participation in the context of the GAP Framework refers to active engagement of stakeholders in decision-making. The defining factor here is that participation must allow for change.

...the organisation must have clear guidelines enabling it to prioritise stakeholders appropriately and to be responsive to the difference in power between them.

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30 It is for this reason that engagement and participation are used interchangeably in the text.

Effective participation

The organisation needs to have a clear statement or policy on the role of participation in decision-making which ensures that stakeholders are represented in issues that directly affect them. Stakeholders should also be able to initiate engagement; control over the process cannot lie solely in the hands of the organisation. Offering stakeholders a mechanism through which they can voice their grievances for the way in which they have or have not been engaged in a decision-making process is important in enabling effective stakeholder engagement.

The policy must also explain the organisation's decision-making structures and processes, and the relationship between different internal and external stakeholder groups in decision-making, both at policy and project level.

For participation to be meaningful, stakeholders should be involved in the decision-making processes throughout the organisation, including enabling input into policy formulation and implementation at the highest levels. If stakeholders are not engaged at this level the process is confined to operational issues and stakeholders are therefore unable to affect the broader structures and policies that impact upon them. This narrow approach to engagement risks the de-politicisation of participation, whereby people's choices are framed within the options and on the terms offered to them by those in positions of greater power.

In relation to the implementation of a participation process, a stakeholder analysis needs to be undertaken which maps out an organisation's stakeholders and describes the relationship between them and the organisation. This will differ from one process to another, so it is important that for each important decision key stakeholders are identified. In order to ensure equity and representation of all relevant views, wide representation needs to be sought in terms of gender, age, race, disability and culture. For those stakeholders that claim to represent others, such as the 'the poor' or 'the disabled', mechanisms need to be in place that can verify this chain of representation. The process for choosing which stakeholders to engage needs to be clear and the reasons for deciding not to engage with certain groups explained and communicated widely.

It is important that the terms of the engagement are made clear and that they are understood by all parties. This involves making sure that the purpose and motivation for engaging stakeholders is clarified and that the duration of the process is understood. This ensures that there is no confusion over what is on the agenda, what is negotiable and what not.

The timing of engagement is critical. Key stakeholders need to be engaged before a decision is made. This is directly dependent on relevant information about the engagement process being made available to stakeholders.

Key challenges to effective participation

Implementation

The question of participation is a complex one that involves making distinctions between a multitude of actors, ranging from those who have the ability to influence an organisation and choose to do so or not, to those who are directly and indirectly influenced by an organisation's project and policies. The challenge of participation is largely one of implementation – incorporating the participation of all relevant actors, meeting the institutional challenges of coordination, defining the rules of engagement, and allowing for change to happen as a result of participation. Capacity is also crucial: having human and financial resources, and the capacity to identify stakeholders

> For participation to be meaningful, stakeholders should be involved in the decision-making processes throughout the organisation, including enabling input into policy formulation and implementation at the highest levels.

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and ensure they are prioritised in such a way that the needs of the most affected are taken into account.

Understanding benefits

There is a growing recognition that if global organisations are truly to claim that they represent the views and needs of their stakeholders, then this must be reflected in the ways that decisions are taken by the organisation and not confined to activities undertaken at local level. Yet effective participation requires the time, resources and commitment to review and revise institutional structures and cultures. It also requires organisation-wide commitment, training and resources to enable staff to meet these demands. As participation becomes formally integrated into more mainstream policy areas, there is growing pressure for clear targets and measurement of effectiveness to ensure value for money. A challenge remains as to how benefits can be highlighted so that participation guidelines do not encourage a tickbox mentality. Organisations will have to demonstrate considerable flexibility in order to adapt principles and practices to suit different situations, for example in emergency situations.

Power differentials

A common critique of participatory processes is that they assume a stakeholder group to be a homogeneous with the same needs. Of course, the reality is far from this simplistic. For an organisation to be accountable it needs to understand where the power lies within and between stakeholder groups and ensure adequate representation of all key stakeholders in the decision-making processes. Equally, for stakeholders to be able to hold an organisation to account, they too must understand the power relations within the organisation and how their engagement fits into this.

Balancing influence

There are already some stakeholder groups who dominate international policy-making. Should their influence be further expanded? A distinction must be made between those stakeholders whose overall engagement should be increased, and those who should more equally distribute the influence already enjoyed. It is also important to recognise that there are stakeholder groups who do not necessarily want to be involved more, or in every decision. However, there are groups that should be able to influence those issues that they care about. This does not necessarily imply more participation, but more meaningful and effective participation.

4.4 Evaluation

Evaluation encompasses the processes through which an organisation, with involvement from key stakeholders, monitors and reviews its progress and results against goals and objectives; feeds learning from this back into the organisation on an ongoing basis; and reports on the results of the process.

Evaluation encompasses both monitoring and evaluation; it involves not just the evaluation of end results (outputs, outcomes or impacts), but also the ongoing monitoring of progress and provision of feedback to enable adjustments that ultimately improve results. It must take place for activities at all levels of an organisation, such as project and programme evaluations, organisational performance reviews, etc. Within the GAP Framework, evaluation encompasses the wide range of evaluation methodologies and processes which occur at all levels of an organisation.

Evaluation plays two roles in accountability. It reports performance against expectations after an event and enables assessment of results, supplying crucial information to stakeholders. It also supports accountability through learning and increasing organisational responsiveness to stakeholders. By providing information on an ongoing basis, it enables the organisation to make adjustments during an activity that enable it to better meet its goals, and to work towards accountability in an inclusive and responsive manner with stakeholders.

For evaluation to increase accountability, it is essential that goals have been set which contribute to accountability: evaluation alone cannot increase accountability, it can only ensure that goals are achieved and reported against. To increase accountability to stakeholders, goals and objectives must be defined in consultation with stakeholders. Therefore, the contribution of evaluation to accountability is dependent on participation: effective participation is needed to produce goals which increase accountability, and evaluation provides a means to ensure that these goals are achieved.

Effective evaluation

An organisation must have a policy in place detailing its commitment to evaluation at all levels and the role of evaluation in increasing accountability to stakeholders. The policy should ensure that evaluation takes place for each of the organisation's activities, and that the key stakeholders of the activity are involved in the evaluation. The policy should ensure that evaluations fulfil two objectives: firstly, it provides information to be reported to relevant stakeholders on progress against goals agreed with these stakeholders; secondly, it provides information that feeds into decision-making processes and ensures learning both throughout and at the end of the activity.

Processes should be in place to support the reporting and learning objectives laid out in the policy. Evaluation results and recommendations should be reported on fully. Information and lessons from evaluations must feed back into the activity to ensure learning, and also be fed into, and communicated throughout, the organisation to contribute to overall organisational performance and accountability.

Prior to an evaluation, an analysis needs be undertaken to identify relevant stakeholder groups and their informational needs. The evaluation will then ensure that these needs are met.

Stakeholders of the activity being evaluated should be involved in the process of evaluation, although the appropriate extent of stakeholder involvement will vary between evaluations. Relevant stakeholders need to be involved in defining the objectives and parameters of the evaluation in the planning stage, forming conclusions and recommendations. This provides continuity with the involvement of stakeholders in setting the goals against which the evaluation is taking place, and ensures that stakeholder views continue to be taken into account in the management and evolution of the activity, not just the final assessment of performance.

The methodology for monitoring and evaluation processes needs to be appropriate to the situation. Particular attention must be paid to the effective use of information and conclusions coming from the monitoring and evaluation. A comprehensive report of the evaluation must be produced to be disseminated to stakeholders and made publicly available.

Evaluations must as independent and as impartial as possible. Any interests which may affect this must be declared.

For evaluation to increase accountability, it is essential that goals have been set which contribute to accountability: evaluation alone cannot increase accountability, it can only ensure that goals are achieved and reported against.

Information and lessons from evaluations must feed back into the activity to ensure learning, and also be fed into, and communicated throughout, the organisation to contribute to overall organisational performance and accountability.

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In addition to evaluating its activities, an organisation should evaluate the following:

- Organisation performance with respect to its mission and objectives

- Financial performance

- Social impact

- Environmental impact

- Compliance with legal requirements

- Employee rights and conditions

- Compliance with human rights

- Compliance with relevant voluntary codes of conduct

Key challenges to effective evaluation

Reporting versus learning objectives

Evaluation contributes to accountability through reporting and also through learning. Balancing these approaches can be difficult as the methods and processes for each may not be compatible, therefore raising the question as to whether the same evaluation can be used for both. For example, the use of an independent external evaluator may lend credibility to reports arising from evaluations. However, to maximise learning from an evaluation a clear understanding of the organisation, activity and situation can be valuable, and this is less likely to be found within an independent external evaluator. Another challenge arises regarding the culture of the organisation, and how an open, responsive culture which supports learning and change can be encouraged when the information is also used for reporting and therefore for performance assessment and possibly disciplinary purposes.

Impartiality/independence of evaluation

Independence and impartiality are important aspects of evaluation. Two challenges arise in relation to this. Firstly the idea of independence and impartiality is much debated as some doubt whether this can be absolute. Therefore in addition to taking actions to ensure as much independence as possible, any interests that might impact this must also be declared publicly. Secondly, as highlighted above, a conflict may arise between independent evaluations and maximising organisational learning, and a trade-off may need to be made, dependent on the situation.

Responding to learning

Ensuring that the information and findings from evaluations feed back into an organisation to improve learning and management is critical, but can be difficult. Processes and information channels need to be set up to ensure that information is disseminated and used, and that it reaches all appropriate levels within the organisation.

4.5 Complaint and response mechanisms

Within the GAP Framework, complaint and response mechanisms are:

The mechanisms through which an organisation enables stakeholders to address complaints against its decisions and actions, and through which it ensures that these complaints are properly reviewed and acted upon

Enabling stakeholders to seek and receive response for grievances and alleged harm is a critical aspect of accountability. This literally enables stakeholders to hold an organisation to account for either its decisions or actions by querying these and requesting an investigation and response. It is also important that these internal complaint and response systems help provide access to justice to those who may otherwise be denied it.

Complaints do not have to be against outcomes, they can also arise against both practice (e.g. non-compliance, corruption) and policies (e.g. decisions taken by an organisation which will have a negative impact on its stakeholders). Complaint mechanisms can therefore be used in relation to ongoing business, decision-making processes, active projects, end products, etc.

The focus here is on non-judicial means of dispute resolution between the stakeholders of an organisation and the organisation itself.[31] The complaint and response mechanisms referred to are internal, institutionalised mechanisms which provide a process through which stakeholders can file a complaint with the organisation and the organisation responds to it. This replaces a situation where complaints against organisations from external stakeholders primarily take place through non-institutionalised mechanisms such as protests or boycotts. Complaint mechanisms can be beneficial by providing a means for organisations to deal with issues internally, and in doing so reducing the risk of reputational damage (and, in more extreme cases, that of judicial redress).

There is tremendous variation between complaint mechanisms, and varying degrees of formality will exist depending on the level at which the complaint is received and dealt with. Complaints should always be dealt with at the lowest effective level: some complaints can be successfully resolved more informally than others, which may need to be processed through a formal and official mechanism. This variation is necessary to ensure that the response is suited to the situation. However, it is important that, if an informal process is not effective, a stakeholder can access a mechanism through which they can lodge and escalate a complaint formally. These mechanisms must have certain essential features and safeguards and it is these that are explored in more detail below.

Effective complaint and response mechanisms

An organisation must have in place a policy for dealing with complaints from stakeholders. This should lay out a process for receiving, investigating and responding to complaints and a description of what constitutes a valid complaint. The policy must set appropriate standards against which the organisation can be judged, and should not allow for gaps in accountability by preventing complaints being filed in relation to particular issues. The policy allows for, and enables enforcement of, a response to the complaint, where this is appropriate.

Complaints do not have to be against outcomes, they can also arise against both practice and policies.

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31   Maladministration of a criminal character, for example, is defined by law and not necessary to discuss in this context.

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...it is crucial that a [complaints] mechanism is made as independent as possible...

A critical characteristic of a complaint mechanism is that it must be independent. This is crucial to the effectiveness of the mechanism, its credibility, and the trust which complainants have in it. Although an internal mechanism can never be entirely independent from the organisation, it is crucial that a mechanism is made as independent as possible and, at the very least, it is independent from the subject of the complaint. This independence must apply to the assessment, investigation and resolution of the complaint.

The integration of complaint and response processes within an organisation is also an important point. As noted above, complaints can be dealt with at different levels of an organisation, and with varying degrees of formality. For instance, a complaint at a project level might be resolved with the project manager without the need for a formal complaints mechanism. Many of the key points in the complaint and response dimension apply to the way in which a complaint is dealt with, at whatever level. Therefore, even at a low level within an organisation, managers need to receive appropriate training on how to process complaints, and understand, for instance, the importance of confidentiality, how to avoid retaliation against the complainant, how to record and respond to a complaint. In addition to the ability to process complaints effectively at any level of the organisation, it is necessary that a formal process is available for those circumstances where a complaint needs to be escalated to the highest level, and the full set of guidelines can be applied for this formal mechanism.

All complaints must be assessed as to whether they are valid or not. To do this, the organisation must have set out clearly in its policy what constitutes a complaint (i.e. against what criteria a complaint can be made). For instance, an organisation may have a policy stating a set of environmental impact standards with which it will comply, and its complaints policy may state that complaints about environmental impact will be accepted in relation to the organisation's compliance with this standard. An organisation without this framework against which complaints can be assessed will have difficulty defending which complaints it chooses to respond and not respond to. The validity of complaints must be assessed against a clear, published definition of, and criteria for, a complaint, and the decision on acceptance or rejection of a complaint must be transparent and communicated clearly to the complainant. The level at which these standards are set is crucial in delivering meaningful and balanced accountability to stakeholders, and will discredit the mechanism if set too low.

Where a complaint is accepted, the necessary investigations should take place in an independent manner, comprehensively and to a high standard, with the necessary consultations, and in line with clear and agreed timescales. Confidentiality must be respected. Clear and ongoing communication should take place with the complainant.

Responses to the findings of the investigation should be determined independently and preferably in consultation with the complainant. This should include a response for the complainant where appropriate (this could be compensation, but could equally be an apology, reinstatement, a change in policy etc), and corrective and preventative action within the organisation. Timelines and responsibilities should be agreed for the response.

In addition to taking corrective and preventative action, the organisation should also feed any lessons from the complaint into a monitoring and evaluation process. The implementation of actions (both response and corrective action) should be monitored, and a process needs to be in place to enable complainants to appeal if the recommendations are not satisfactorily implemented.

Key challenges to effective complaint and response mechanisms

What constitutes a complaint?

A common concern is that an organisation may not be able to respond to some complaints due to their scope. For instance, a mining company may receive a complaint from a stakeholder about the fact that they are involved in mining. This is clearly not a complaint that can be dealt with through such a mechanism; an organisation maintains its mission and objectives, and the complaint mechanism is for issues relating to how the organisation operates in achieving these, and the impacts that it has. This is why an organisation must have a clear policy on what constitutes a complaint and why the policy must make clear reference to the standards with which the organisation will comply. Complaints can then be addressed against compliance with these standards. These standards must be of a level that makes them meaningful. To ensure this the organisation should accept comments on the level of the standards set. There must not be an accountability gap, where, because standards are not set, complaints cannot be assessed.

Forward thinking organisations will take note of complaints that are not accepted under the policy, assess their importance, and use them to inform future planning, especially on possible risks.

Implementing independent mechanisms and enforcement

Putting in place an internal mechanism with maximum possible independence from the organisation is a challenge. It is crucial that a complaint can be made to, and assessed by, an individual independent from the subject of the complaint. However, for the most formal mechanisms, where for instance a complaint is addressed against the whole organisation, this can be difficult to implement. In these cases it may be necessary to involve external people with no past, present or future conflicts of interest in order to ensure independence. Yet internal recommendations will always have to go to management at the final stage, and there is no mechanism (other than adverse publicity) to make sure that the independent judgement and decisions are enforced. The inherent weakness of an internal mechanism therefore is that independent decisions can not be enforced if management are against them. Ultimately, accountability is dependent on the existence of an external authority with enforcement power which complainants can turn to.

'Solving' issues

Complaints, by their nature, take place after the alleged harm took place. In most cases, complaint mechanisms deal with events that have already happened, and therefore often cannot change the outcome or 'solve' the issue. In these situations, they can function in determining a response or redress, but it may be that no action can be taken other than acknowledgement of the issue. It should be emphasised that complaint and response mechanisms are a last resort; stakeholder engagement is the essential precursor that prevents complaints arising.

Organisational policy and capacity

T1 Policy development	**T1.1** The organisational policy on transparency is developed in consultation with stakeholders and relevant experts, and reflects the needs of stakeholders.
T2 Policy content	**T2.1** The organisation has a disclosure policy that outlines the rules related to access to information.
	T2.2 The policy provides a clear statement committing the organisation to the release of information in the absence of a compelling reason not to disclose and a clear statement on what constitutes a compelling reason.
	T2.3 The policy provides a clear statement on issues of confidentiality. It states what information it regards as confidential, and why (this might relate to third party confidentiality, commercial confidentiality, staff confidentiality, etc).
	T2.4 The policy provides a clear description of the information disclosure process and the process guarantees to which the organisation can be held to account. This should include: • How to make an information request • Timeframes for dealing with information requests • Details of how the response will be made • Details of the rules governing decisions • Costs of obtaining information (if any are incurring).
T3 Governance	**T3.1** Responsibility for oversight and implementation of the transparency policy is assigned to a member of the Board, and responsibilities are cascaded throughout the organisation as appropriate, to ensure the policy objectives are reflected in goals and activities at all levels of the organisation.
	T3.2 A system of incentives and sanctions for employees is operated to ensure compliance with the organisation's policy on transparency.
	T3.3 Evaluation of the transparency policy and process occurs on a regular basis in consultation with stakeholders.
	T3.4 An appeal process exists, which allows stakeholders to appeal when they feel they have wrongly been denied access to information. This process conforms to the guidelines set out in the Complaint and Response Mechanisms section.
T4 Resources	**T4.1** Resources are assigned for the implementation of the transparency policy throughout the organisation, which cover staff and operational costs.
	T4.2 Relevant staff at all levels of the organisation are trained in how to respond to and/or refer an information request.
	T4.3 Within the organisation expert resources are available to advise on transparency and information disclosure.
T5 Accessibility: information availability	**T5.1** Information on the organisation's transparency policy is actively disseminated in a clear and easily understandable manner to key stakeholders in appropriate forms and through appropriate media. Appropriate form may include catering for different languages, visual impairment, deafness, etc; appropriate media may include print, the World Wide Web, video, audio, public meetings, etc.
	T5.2 Information on the organisation's transparency policy and the process for filing a request is easily available to stakeholders in appropriate forms and through appropriate media.
	T5.3 Contact details for a relevant person in the organisation are provided.
T6 Accessibility: user-friendliness	**T6.1** The process for filing an information request is easily understandable by stakeholders.
	T6.2 Requirements for filing an information request take into account the likely capacities of stakeholders.
	T6.3 Stakeholders are not prevented from accessing information due to financial constraints.
	T6.4 Ideally, the organisation facilitates stakeholders' access to independent support when necessary.
	T6.5 The process of filing a request uses appropriate media.

Specific information requirements

The following must be made available in appropriate forms and through appropriate media (see T5.1)

T7 General institutional information		
	T7.1	Details of the organisation's operations. For each activity this includes a description of the activity, where it is taking place, when it is taking place, what the objectives are, what the assigned budget is and who has responsibility for it.
	T7.2	All policies relating to an organisation's commitment to accountability (such as policies on transparency, participation, evaluation, complaints, conflict of interests, ethical conduct, etc).
	T7.3	Policy and activity evaluations and annual reports.
	T7.4	A clear description of the organisational structure. This should include details of any subsidiaries, holdings in other organisations, and partners.
	T7.5	A comprehensive list of key staff, specifying their contact details and the scope of their responsibilities.
	T7.6	Annual budgets and financial statements that provide information on the organisation's income, sources of income and expenditure broken down to department level, balance sheets, and interests in subsidiaries.
	T7.7	Reports detailing the organisation's impact (environmental, social).
	T7.8	Political and charitable contributions.
	T7.9	Any codes, partnerships or coalitions to which the organisation is a signatory.
	T7.10	Details of third party advisors to the organisation.
T8 Governance structures & decision-making processes	**T8.1**	Members on the executive and governing bodies are identified and there is clarity about how they can be contacted. Their interests in other organisations are declared in relation to the conflict of interest policy, to make it clear how the organisation deals with actual and potential conflicts of interest.
	T8.2	The number of votes held by each member in the executive and governing bodies is disclosed.
	T8.3	A clear and meaningful description of how decisions are made at the operational, policy and strategic levels of the organisation is provided.
	T8.4	The outputs from, records of, and information that informed the, decision-making processes are made available. This may include transcripts, summaries, minutes and agendas of meetings and background documentation.
	T8.5	There is openness on how stakeholders can input into the different levels of decision-making.

Organisational policy and capacity

P1 Policy development	**P1.1**	The organisational policy on participation is developed in consultation with stakeholders and relevant experts, and reflects the needs of stakeholders.
P2 Policy content	**P2.1**	The organisation has a clear statement or policy on the role of stakeholder engagement and participatory processes in desision-making, which ensures that key stakeholders will be represented and their interests taken into account.
	P2.2	The policy explains organisational decision-making structures and how stakeholder engagement relates to them.
	P2.3	The policy clarifies the principles that guide decisions.
	P2.4	The policy stipulates how outcomes of any given engagement process will affect decisions and translate into practice.
	P2.5	The organisation allows key stakeholders to initiate engagement.
	P2.6	Comprehensive stakeholder analyses are undertaken on an ongoing basis to inform participation processes. These occur both at organisational level and for each individual policy or project, and map out the relationship between the organisation and stakeholders, indicating: • The person(s) in the organisation directly responsible for the decisions on any given issue • The stakeholders affecting decisions • The stakeholders affected by the decisions on any given issue • Groups and organisations currently working or that have worked on similar issues • When, to what extent, and on what terms stakeholders are involved.
	P2.7	The policy stipulates that each participation process has clear terms of reference that answer the following questions: • Who decides which stakeholder groups are involved • What influences the decision on which stakeholder groups will be prioritised over others • How the decision is made and through what process • The reasons for selecting certain stakeholder groups over others • How representatives from stakeholder groups are selected.
	P2.8	The organisation ensures that stakeholder groups that are engaged are balanced and relevant to the issues discussed.
	P2.9	Mechanisms are in place to ensure that those representing other stakeholders are legitimate representatives.
	P2.10	The policy needs to be explicit about how it will address costs incurred by stakeholders during engagement.
P3 Governance	**P3.1**	Responsibility for oversight and implementation of the participation policy is assigned to a member of the Board, and responsibilities are cascaded throughout the organisation as appropriate, to ensure the policy objectives are reflected in goals and activities at all levels of the organisation.
	P3.2	A system of incentives and sanctions for employees is operated to ensure compliance with the organisation's policy on participation.
	P3.3	Evaluation of the participation policy and participatory processes occurs on a regular basis in consultation with stakeholders.
	P3.4	An appeal process exists, which allows stakeholders to appeal when they feel they have wrongly been denied access to engagement processes. This conforms to the guidelines set out in the Complaint and Response Mechanisms section.
P4 Resources	**P4.1**	Resources are assigned for the implementation of the participation policy throughout the organisation, which cover staff time and operational costs.
	P4.2	Relevant staff at all levels of the organisation understand the desision-making structures and processes that guide stakeholder participation, and are trained in participatory practices.
	P4.3	Independent advisors and facilitators are used when appropriate.

P5 Accessibility: information availability	P5.1	Information on the organisation's participation policy and about individual stakeholder engagement processes is actively disseminated in a clear and easily understandable manner to key stakeholders in appropriate forms and through appropriate media. Appropriate form may include catering for different languages, visual impairment, deafness, etc; appropriate media may include print, the World Wide Web, video, audio, public meetings, etc.
	P5.2	Information on the organisation's participation policy and about individual stakeholder engagement processes is easily available to stakeholders in appropriate forms and through appropriate media.
	P5.3	Contact details for a relevant person in the organisation are provided.
P6 Accessibility: user-friendliness	P6.1	Key stakeholders are not prevented from participation processes due to lack of physical access, communication barriers (language or expert terms) or financial constraints.
	P6.2	Disadvantaged groups are given special support and encouragement when their engagement is appropriate.
	P6.3	The confidentiality of stakeholders during an engagement process is guaranteed by the organisation where appropriate.

Participation practice

P7 Setting the context	P7.1	The organisation will clearly state the purpose and reasons for engaging stakeholders in any decision-making process.
	P7.2	Each engagement process has a clear vision and purpose. • There is clarity on what is negotiable and what type of changes will be accepted as a result of the engagement process • Stakeholders' concerns, issues and what it is that they are interested in are identified prior to engagement.
	P7.3	The type and level of participation is made clear before each engagement process (information, consultation, involvement, partnership/collaboration, empowerment) and stakeholders are informed about what role they are expected to play.
P8 Timing	P8.1	Participation takes place prior to, and during, the decision-making process.
	P8.2	The duration of the process is made clear and the timetable of decision-making is provided.
P9 Reporting	P9.1	The stakeholder analysis is publicly available.
	P9.2	The organisation's reasons for deciding not to engage with certain stakeholder groups are listed, explained and communicated.
	P9.3	Stakeholders' reasons for non-engagement are listed, explained and communicated, where available.
	P9.4	All views represented during the participation process are made public except where there are clear reasons to protect confidentiality, and these are provided.
	P9.5	The results of the engagement process are reported back to stakeholders and made publicly available, clarifying what stakeholder feedback has been used and how it affected the decision-making process.

Organisational policy and capacity

E1 Policy development	**E1.1** The organisational policy on evaluation is developed in consultation with stakeholders and relevant experts, and reflects the needs of stakeholders.
E2 Policy content	**E2.1** The organisation has a policy on the need for evaluation of activities, and its role in increasing accountability to stakeholders.
	E2.2 Evaluation takes place for key activities, with the objectives of: • Providing information to report to key stakeholders on progress against goals agreed with these stakeholders • Providing information to feed into management and learning, both throughout and at the end of the activity.
	E2.3 The policy states that key stakeholders should be involved in evaluations.
	E2.4 The organisation has a policy and processes for ensuring learning from evaluations is used within the organisation: • Processes exist to feed information and learning from the monitoring and evaluation back into the activity, to contribute to activity effectiveness and success • Mechanisms exist for feeding back information and learning from the monitoring and evaluation into the organisation.
	E2.5 The organisation has a policy that evaluation results and recommendations are reported on fully.
E3 Governance	**E3.1** Responsibility for oversight and implementation of the evaluation policy is assigned to a member of the Board, and responsibilities are cascaded throughout the organisation as appropriate, to ensure the policy objectives are reflected in goals and activities at all levels of the organisation.
	E3.2 A system of incentives and sanctions for employees is operated to ensure compliance with the organisation's policy on evaluation.
	E3.3 Evaluation of the evaluation policy and evaluation processes occurs on a regular basis in consultation with stakeholders.
	E3.4 An appeal process exists, which allows stakeholders to appeal when they feel they have wrongly been denied input to evaluations. This process conforms to the guidelines set out in the Complaint and Response Mechanisms section.
E4 Resources	**E4.1** Resources are assigned for the implementation of the evaluation policy throughout the organisation, which covers staff and operational costs.
	E4.2 Relevant staff at all levels within the organisation are trained in evaluation and monitoring procedures and the use of results.
	E4.3 Within the organisation, expert resources are available to advise on evaluation at all levels.
	E4.4 Evaluators, both internal and external, are trusted, credible and impartial.
E5 Accessibility: information availability	**E5.1** Information on the organisation's evaluation policy, engaging with evaluations and accessing results of evaluations is actively disseminated in a clear and easily understandable manner to key stakeholders in appropriate forms and through appropriate media. Appropriate form may include catering for different languages, visual impairment, deafness, etc; appropriate media may include print, the World Wide Web, video, audio, public meetings, etc.
	E5.2 Information on the organisation's evaluation policy, engaging with evaluations and accessing results of evaluations is easily available to stakeholders in appropriate forms and through appropriate media.
	E5.2 Contact details for a relevant person in the organisation are provided.
E6 Accessibility: user-friendliness	**E6.1** Key stakeholders are not prevented from participating in evaluation for reasons of physical access or communication barriers.

Evaluation practice

E7 Stakeholder involvement	E7.1	The evaluation for an activity meets the informational needs of key stakeholders: • An analysis is undertaken for each planned evaluation to identify key stakeholders and their information needs • The evaluation is designed to ensure all identified informational needs are met.
	E7.2	Relevant stakeholders are involved in the evaluation of a specific activity: • Defining the objectives and parameters of the evaluation in the planning stage • Participating in data collection and analysis if appropriate • Forming conclusions and recommendations • Ensuring appropriate changes are made and learning processes are initiated • Ensuring appropriate reporting of the evaluation.
	E7.3	Clear and comprehensive information on the evaluation is provided to stakeholders throughout the evaluation: • Evaluation objectives and parameters prior to evaluation • Evaluation design prior to evaluation • Results and recommendations from the monitoring and evaluation • Progress on implementation of the recommendations from the evaluation.
	E7.4	Stakeholder involvement in the evaluation conforms to the guidelines in the Participation section.
E8 Evaluation set-up & planning	E8.1	The purpose and objectives of the evaluation are communicated clearly.
	E8.2	The evaluation is designed so that outputs meet stakeholder needs.
	E8.3	The methodologies identified for use are appropriate to the situation.
	E8.4	Identification of indicators considers data sources and availability, feasibility of data collection, data accuracy and reliability.
	E8.5	The plan for evaluation is feasible in terms of budget, capacity and timescales.
	E8.6	The timing of monitoring and evaluation outputs is planned so as to feed into decision-making processes.
	E8.7	Clear responsibility is allocated for the delivery of the evaluation.
E9 Data collection & analysis	E9.1	Appropriate methods of data collection are used.
	E9.2	Data is checked for errors.
	E9.3	Data is systematically analysed.
	E9.4	Conclusions and recommendations are justified from the data.
	E9.5	Outputs from the data analysis enable action.
E10 Monitoring & learning	E10.1	Results are processed and released on a regular basis to inform the ongoing development and decision-making within the activity.
	E10.2	Adjustments to the activity are made as needed during the monitoring process.
E11 Reporting	E11.1	An accurate report of the evaluation process is made available to describe objectives, participants, methodology and approach, results, conclusions and actions to be taken. Confidentiality is protected when necessary, and reasons for this are provided.
	E11.2	Evaluation reports are disseminated to key stakeholders on a timely basis.
	E11.3	Evaluation reports are made publicly available.
E12 Specific evaluation	E12.1	In addition to evaluating specific activities, the organisation will evaluate the following: organisation performance with respect to its mission and objectives; financial performance; social impact; environmental impact; compliance with legal requirements; employee rights and conditions; compliance with human rights; compliance with relevant internal and external voluntary codes of conduct.

GAP guidelines: Complaints & response mechanisms

Organisational policy and capacity

C1 Policy development	C1.1	The organisational policy on complaints and response is developed in consultation with stakeholders and relevant experts, and reflects the needs of stakeholders.
C2 Policy content	C2.1	The organisation has a policy that it will receive, investigate and respond to complaints from stakeholder groups. A response should include corrective action where appropriate.
	C2.2	The policy contains a clear definition of what constitutes a complaint and how validity of complaints will be assessed.
	C2.3	The policy does not allow accountability gaps; complaints can be filed in relations to any stage of an activity – before, in the planning stage, during consultation, during implementation, and post-implementation.
	C2.4	The organisation enables complaints to be received and processed at a level appropriate to the complaint, and also provides a route for escalation of complaints.
	C2.5	The terms of reference for the mechanism covers the scope and powers of the mechanism, a definition of what constitutes a complaint, and who can file a complaint.
	C2.6	A description of the complaint process is provided, which includes an outline of the process stages (which include complaint filing, acknowledgement, assessment on validity of complaint, investigation, judgement, implementation of response and corrective action), timeframes for each stage of the process, rules governing desision-making, and responsibilities for the process.
	C2.7	Identities of complainants and information relating to the complainant can be kept confidential where appropriate.
	C2.8	The organisation has a non-retaliation policy towards complainants.
	C2.9	It should be possible for complaints to be filed on behalf of affected parties where necessary, but this must be only with the affected parties' proven consent.
C3 Governance	C3.1	Responsibility for oversight and implementation of the complaint and response policy is assigned to a member of the Board, and responsibilities are cascaded throughout the organisation as appropriate, to ensure the policy objectives are reflected in goals and activities at all levels of the organisation.
	C3.2	A system of incentives and sanctions for employees is operated to ensure compliance with the organisation's policy on complaints and response.
	C3.3	Evaluation of the complaint and response policy and the effectiveness and impact of the mechanism occurs on a regular basis in consultation with stakeholders.
	C3.4	The mechanism provides access to an appeal process for both parties. This can be an internal appeal (e.g. the Board) and/or access to an independent external process (e.g. an Ombudsman), where one exists.
	C3.5	The complaint mechanism and the people involved in assessing, investigating and responding to the complaint are independent from the subject of the complaint and the complainant. Consideration should be given to past, present and future affiliations.
C4 Resources	C4.1	Resources are assigned for the implementation of the complaint and response policy throughout the organisation, which cover staff and operational costs.
	C4.2	Relevant staff at all levels of the organisation are trained to be able to respond to and/or refer complaints.
	C4.3	Members of staff are able to bring in, or refer to, additional resources in situations where specific expertise is necessary.
C5 Accessibility: information availability	C5.1	Information on the complaint mechanism is actively disseminated in a clear and easily understandable manner to key stakeholders in appropriate forms and through appropriate media. Appropriate form may include catering for different languages, visual impairment, deafness, etc; appropriate media may include print, the World Wide Web, video, audio, public meetings, etc.
	C5.2	Information on the complaint policy (the terms of reference) and the process of filing a complaint is easily available to stakeholders in appropriate forms and through appropriate media.
	C5.3	Contact details for a relevant person in the organisation are provided.

C6 Accessibility: user-friendliness	C6.1	The design of the mechanism caters to the situation and needs of the stakeholders for which it is intended. In particular the mechanism meets the needs of the most vulnerable.
	C6.2	Requirements for filing a complaint take into account the likely capabilities of the complainants, and consider minority and disadvantaged stakeholders.
	C6.3	Independent support is available to help stakeholders understand whether their complaint is valid and to provide technical/legal advice if necessary.

Complaint investigation

C7 Assessment of complaint validity	C7.1	Validity of complaints is assessed against a clear, published definition of, and criteria for, a complaint.
	C7.2	The decision on acceptance or rejection of a complaint is transparent, and the decision and reasons for making the decision are communicated clearly to the complainant.
	C7.3	In the case of a complaint being rejected, advice is provided to the complainant regarding how and where to progress/refer the complaint.
C8 Process of investigation	C8.1	The investigation team has the appropriate skills and knowledge to investigate the complaint.
	C8.2	The investigation plan is agreed in consultation with the complainant.
	C8.3	Clear timelines for the investigation and decision of the complaint are produced and communicated, and the investigation is completed on a timely basis.
	C8.4	The investigation team is able to undertake the full range of investigations desired (including accessing internal documents and making site visits), including consulting with key stakeholders.
	C8.5	The investigation is conducted in a sensitive and appropriate manner, dependent on circumstances, and taking into account cultural, gender, religious and other matters where necessary.
	C8.6	Information gathered is treated confidentially.
	C8.7	The investigation team ensures comprehensive documentation and records of the investigation.

Outcomes

C9 Redress for the complainant	C9.1	Decisions on appropriate response are taken with reference to published guidelines, take into account the situation and local conditions, and are determined in consultation with the complainant.
	C9.2	Responsibility and timelines for the implementation of the response are assigned.
	C9.3	Agreement is reached that the complainant is satisfied with the outcome.
C10 Organisational corrective action	C10.1	The outputs from the mechanism include recommendations for corrective and preventative action within the organisation.
	C10.2	The organisation has processes and responsibilities in place for assessing complaints cases, identifying causes, drawing lessons from these, and feeding this back into the appropriate part of the organisation.
C11 Post-resolution follow-up	C11.1	The implementation of actions (both response and corrective action) is monitored by the complaint mechanism (it could also be monitored by an independent, external third party).
	C11.2	A process is in place to enable complainants to appeal if the recommendations are not satisfactorily implemented.

The current state of accountability in global organisations

This section offers a broad overview of the state and development of accountability in the IGO, TNC and INGO sectors. The discussion is structured according to the four key dimensions of accountability in the GAP Framework.

Accountability reforms cannot be prescriptive and applied in the same way to every organisation, not least because stakeholders and the context within which organisations operate differ radically – although as this paper has argued key principles do exist that can cut across all types of organisations. This section identifies some of the specific accountability challenges faced by each sector and highlights ways in which organisations are trying to overcome them. It reveals that, although global organisations still have a long way to go in ensuring balanced stakeholder accountability, there is an array of interesting initiatives emerging.

6.1 Intergovernmental Organisations (IGOs)

Perhaps the most important driving factor for accountability of IGOs is the considerable public criticism that they have been subjected to in recent years. IGOs have become major targets of demands for accountability, particularly criticised for their lack of transparency and failure to effectively engage stakeholders in decision-making processes.

The 1999 protests outside the WTO meeting in Seattle were not a unique event. For more than a decade now, the anti-globalisation movement has been prominent at the meetings of organisations such as the IMF and the World Bank, calling for different models of economic development as well as wholesale reforms of the organisations in order to increase their accountability to those directly affected by their decisions. More recently still, since the first World Social Forum in Porto Alegre, Brazil in 2001, global civil society has been attempting to develop an alternative agenda for development and poverty reduction that requires the participation of those most affected by the decisions of IGOs, in the belief that this will make these institutions more responsive and therefore more accountable to them.[32]

Member-states have always exerted some form of accountability, but as the call for public scrutiny grows, IGOs need to become more accountable both to their members, affected communities and the public at large.

Transparency

Intergovernmental organisations, particularly when playing their role of donors, are constantly asking for increased transparency by attaching 'good governance' conditionality to their loans. Yet few IGOs appear to apply the principle of access to information within their own decision-making bodies. However, that access to timely, relevant information about an organisation's activities and policies is vital in ensuring that stakeholders are able to hold an organisation to account[33] has been widely accepted in the IGO sector. Many IGOs, which have previously operated largely in secret, or disclosed information purely at their discretion, are now acknowledging that public access to the information that they hold is a right, not a privilege. A significant milestone in this process was the adoption of the 1992 Rio Declaration on Environment and Development, which

32 Burall and Neligan (2005)
33 Florini (2003)

put enormous pressure on international institutions to implement policies on public participation and access to information.

Disagreement occurs when trying to decide what information should be made available to stakeholders, particularly when issues around public good need to be balanced against those of public harm (because it is market sensitive, is based on secret intelligence in relation to peace and security etc). What makes these debates so important is that movement towards greater transparency may be the first step towards broader organisational reform, thus IGOs agreeing to increase their transparency will open their activities up to increased scrutiny which will undoubtedly bring about more participation.

Since the adoption of the Rio Declaration the MDBs have adopted information disclosure policies. Although the World Bank's policy is flawed in some areas, the Bank has taken concrete steps to review it nearly every two years since 1995. The regional development banks have followed the World Bank's lead and developed largely similar disclosure policies. Recommendations have been brought forward by various groups relating to three main areas: the policies should provide a narrow list of legitimate aims and allow information to be withheld only where disclosure would threaten to harm those aims; they should include strict timelines for the disclosure of information and a requirement that any refusals be accompanied with substantive reasons; and the organisations should establish an independent body to review refusals to disclose information.

In 1997, the United Nations Development Programme (UNDP) also adopted a Public Information Disclosure Policy, on the basis that information is a key to sustainable human development and also to UNDP accountability. The policy lists specific documents to be made available to the public and provides for a general presumption in favour of disclosure, subject to a number of exceptions. In terms of process, the policy establishes a Publication Information and Documentation Oversight Panel which can review any refusal to disclose information.

In May 2001, the European Parliament and the Council of the European Union also adopted regulation on access to European Parliament, Council and Commission documents. Article 2(1) states: "Any citizen of the Union, and any natural or legal person residing or having its registered office in a Member State, has a right of access to documents of the institutions, subject to the principles, conditions and limits defined in this Regulation." The Regulation provides for an internal review of any refusal to disclose information, as well as an appeal to the courts and/or the Ombudsman. However, the Regulation allows a Member State to require other States not to disclose documents without its prior approval.

The OECD provides an interesting example of how external pressure can lead to increased disclosure. After considerable public pressure relating to the controversial Multilateral Agreement for Investments, the OECD has published the minutes of all committee level and governing body level meetings relating to this agreement. Though these did not identify the positions taken by the representatives of member states, arguably reducing the ability of electorates to hold governments accountable for the position they take at these bodies, this was at least a move towards greater access to information. Normally the public would not have access to such a discussion for 20 years.

In addition to the transparency of formal governance processes, there are a number of other organisational processes that need clear transparency guidelines. For example, for stakeholders to effectively engage in an organisation's decision-making processes they not only need clear

policies about how stakeholders will be chosen, but also require access to adequate information in a form that can be easily understood. Transparency of both evaluation, and complaint and response processes are also important to ensure their integrity and legitimacy.

When addressing the issue of access to information, it is important to highlight that internal flows of information are as important as what is made externally available. Ensuring full access to information is a fundamental element in the accountable functioning of any IGO, but consent by the parties whose interests are protected by confidentiality requirements is usually a prerequisite.

One of the main challenges and barriers to IGOs increasing transparency is related to the user-friendliness of the documentation that is being made available to stakeholders. Multi-lingual decision-making takes years of preparation and can be very costly. According to the European Commission, the total annual cost of EU multilingualism will soon rise from 875 million dollars U.S. (670 million euros) to 1.3 billion dollars U.S. (1 billion euros).[34]

Participation

Internal stakeholders

At the level of formal membership, many IGOs, including BIS, World Bank, IMF, WTO and the UN Security Council, have structures and processes which give some members considerably more power within decision-making processes than others. For example, the US, UK, France, Germany, Saudi Arabia, Russia and China all are directly represented on the World Bank's Executive Board, and therefore have one vote each, while other nations are grouped within constituencies. Each constituency is of a different size and is represented by one Executive Director with one vote. At its most extreme this results in forty-six of the African nations being grouped into two constituencies and therefore sharing only two representatives and having only two votes between them.

At the BIS the founding six members (Belgium, France, Germany, UK, Italy and US) hold the majority of votes. They dominate representation on the executive and control key changes to the governing articles. At the executive body, a maximum of twenty-one member representatives are entitled to sit at any one time. The six founding members have two seats each, giving them a permanent majority. The additional nine places are open to other member representatives on a rotating basis, but are subject to appointment by the founding members.[35]

Barriers to participation exist not only in terms of formal structures of representation but also in terms of more informal decision-making processes that develop. In theory, all 148 WTO member countries have veto power, since this is an organisation that operates by consensus. The reality, however, is that informal structures reduce the potential for all members to affect the decisions made by the organisation.[36] Officially, all members can add items to the agenda of governing body meetings, but much of the agenda is set during the 'Green Room' meetings and are rarely publicly announced in advance. Despite recent attempts by the WTO to report back from these meetings to the full membership, the structural problems underlying this particular accountability gap remain.

Barriers to participation exist not only in terms of formal structures of representation but also in terms of more informal decision-making processes that develop.

34 Owen (2005)
35 Kovach et al (2003)
36 Woods & Amrita (2001)

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While it is neither practical nor desirable to prevent informal meetings of small groups of states from being organised, these informal meetings should not be the forums for carrying out the formal business of the organisation. Further reforms are needed to ensure that the organisation makes decisions efficiently (a problem in the case of an organisation like the WTO with 148 members each with one vote) while at the same time ensuring genuine accountability to all of the members.

External stakeholders

Over the last decade or so, IGOs have increasingly engaged with external stakeholders through forums, committees, conferences and consultations, as highlighted by the increase in the number of CSOs attending UN meetings today. For example, the UN held a World Conference on Human Rights in Tehran in 1968 and there were no CSO participants present. By contrast, 2,100 CSOs participated in the 1995 UN Conference on Woman in Beijing.

For an organisation to engage successfully with external stakeholders, it must ensure that those with the greatest stake are afforded the best opportunity to become involved in decision-making processes, while at the same time ensuring that those with vested interests and the capacity to make those interests heard are not the only ones who influence the process. In the end, the decision over the choice of stakeholders all too often requires a political decision, and few IGOs have in place the right processes and oversight mechanisms to ensure that the correct stakeholders are engaged in each decision.

It is now common practice for most IGOs to consult on both their projects and policies at the local, regional and, increasingly, the global level. The World Bank, for example, is seeking to mainstream the engagement of a wide range of external stakeholders in the development of all of its country level policies and lending. Other IGOs, such as the UN, WTO and BIS, consult at the policy formulation stage and open-up their committees to a wide array of actors. Yet often very little is actually open for change, with most of the agenda decided beforehand and external stakeholders only able to influence minor details rather than any of the main substance of a given policy or project. Therefore, participation is at times considered to be a rubber stamp exercise that enables IGOs to legitimise their policies, without actually taking on board the views of external stakeholders.

In June 2004, what became to be known as the Cardoso Panel released its report containing 30 proposals for changing the practices for civil society engagement in the UN. These highlighted the importance of civil society's engagement in UN decision-making, noting that there are a number of key challenges both to the principle and practice of such engagement. The report highlighted that increasing participatory practices at the UN will extend the organisation's already stretched capacity to breaking point, thus the organisation must develop more selective and representative forms of engagement rather than simply increasing its level of engagement.

Another clear trend is the establishment of more institutional mechanisms of engagement such as permanent stakeholder committees and advisory boards. These mechanisms are becoming increasingly popular as IGOs try to manage the sheer volume of external stakeholders they engage with. Most run parallel to official governing and executive bodies within IGOs and have the ability to monitor and comment on IGO policies, seemingly enabling input at a more strategic level.

Some IGOs, both within and outside the UN system, have built engagement with civil society into formal organisational processes right from the start. For example, the ILO and the OECD have done this in very different ways.

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The ILO's constitution gives its key stakeholders, business and unions, specific powers within the organisation. Its two governing bodies, for example, have a tripartite structure and involve government, employers and workers in a ratio of 2:1:1. Unlike any other IGO, the stakeholders are given both speaking and voting rights on a par with the governments.[37] Yet the organisation is seen by some to be ineffective and bureaucratic, particularly because of this tripartite structure. This in itself highlights one of the main challenges of both participation and accountability mechanisms: the careful balance that needs to be struck between formalising processes and keeping these flexible so as not to hinder efficient decision-making.

The OECD, on the other hand, engages external stakeholders in an advisory capacity only. Since its inception in 1961 the organisation has engaged with civil society (business and trade union organisations only) through two advisory committees which are formally recognised by the OECD and are involved in consultations across a wide range of specific issues. Despite increasing non-formalised engagement with other types of CSO over the last few years some groups, such as development NGOs, are much less active in OECD policy than others.[38]

With ever increasing demands for civil society voices to be taken into account within IGO decision-making processes, IGOs are finding themselves in the position of having to decide who they listen to. They have an ongoing problem of developing organisational structures and processes which enable meaningful engagement of all relevant stakeholders. This opens them up to charges of acting as 'gatekeepers' of civil society. With IGO legitimacy being increasingly challenged, the politics of choosing external stakeholders means that the process of engagement, including the choice of stakeholders, must take place in a more transparent way.

Evaluation

IGOs need to be accountable for their performance and face many difficult decisions about how to allocate public funds. Evaluations to assess performance, measure effectiveness, identify results achieved, and determine alternative ways to meet objectives become a means through which IGOs can demonstrate accountability and transparency to a broad range of stakeholder groups. Sharing results can help build credibility with stakeholders and support for what the IGO is trying to accomplish.

By their very nature, IGOs need to undertake evaluations at international, national and local levels, ranging from project performance to policy impact. Evaluating organisational performance is a huge task for IGOs given the scale of both their activities and geographical scope. A challenge encountered by all types of IGOs is how to capture this learning and feed it back into organisational policies and practices, both at the head office and throughout the operational departments.

World Bank projects, for example, are rated on three measures: outcome, institutional development impact and sustainability. Results are measured only at the final disbursement of funds and projects are not subject to continual monitoring and evaluation. Moreover, the World Bank is inconsistent in its provision of evaluation material, often abdicating responsibility for publication to borrowing countries.[39]

37 ILO (2000)
38 Gaughran (2003)
39 Bank Information Centre (2001)

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"Evaluation should be
a repetitive process
spread over many
years, including
well after the final
disbursement
of funds when an
operational history is
available."[41]

Although the MDBs devote significant resources to monitoring procurement of inputs, they do little to measure the effectiveness of outputs over time.[40]

Within the UN, the focus of monitoring and evaluation has shifted from assessing inputs and implementation processes to assessing the contributions of various factors to a given development outcome. Increasingly the focus at the UN is turning to performance thus increasing both the importance and scope of accountability and evaluation in the organisation. The General Assembly Resolution 56/201 emphasises "the importance of monitoring and evaluation of operational activities of the UN system to enhance effectiveness and impact." Agencies such as UNICEF, for example, recognise that evaluations of UNICEF-supported country programmes and of the organisation performance overall, regionally and globally, enables the organisation to learn. This makes it more accountable to national partners, donors, sister organisations, and ultimately to children and women. IFAD's Office of Evaluation states that its mission is to promote accountability and learning and to improve the performance of the Fund's operations and policies. Evaluations in this regard provide a basis for accountability by assessing the impact of IFAD-funded activities and are expected to give an accurate analysis of successes and shortcomings – 'to tell it the way it is'.[42]

Unlike at the World Bank and the IMF, most evaluation mechanisms of UN agencies are not independent, and, rather than reporting straight to the governing body, report to line managers. Although this might suggest that the UN has less effective evaluation mechanisms, it is important to highlight that internal evaluations which become genuine internal learning mechanisms, are more likely to foster greater accountability in organisations that have made a commitment to change and reform.

Given IGOs' scope, reach and vast number of stakeholders, defining criteria for the effectiveness of projects, programmes or policies remains one of the main challenges. As with all global organisations, participatory monitoring and evaluation can prove to be costly. Yet robust internal and external scrutiny and accountability cannot be achieved without meaningful evaluation processes as organisations have few other mechanisms for promoting learning.

Complaint and response mechanisms

Without an effective complaint mechanism in place, there is little that stakeholders can do to prevent abuses of power should other accountability mechanisms fail. A rigorous complaint mechanism will provide an incentive for IGOs to ensure that other accountability mechanisms are consistently implemented and adhered to in all areas of their work.

Debates around IGOs complaint mechanisms emerged in response to a number of controversial infrastructure projects in the 1980s and 1990s. The role of the World Bank in funding these was criticised, prompting it to establish the Morse Commission. Its report documented failures of the Bank to comply with its policies, and the serious human and environmental consequences arising from these violations. In response to this, in 1993, the Board of Directors created the Inspection Panel for the International Bank for Reconstruction and Development and the International Development Association. This provides people directly and adversely affected by a Bank-

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40 International Financial Advisory Commission (2000)
41 *Ibid*
42 IFAD's Evaluation Policy

financed project with an independent forum through which they can request a review of the Bank's compliance with its policies. The Compliance Advisor/Ombudsman Office (CAO) of the International Finance Corporation and the Multilateral Investment Guarantee Agency was created in 1999 in response to criticism that the institutions were not covered by the Bank's Inspection Panel. The CAO is a more flexible, settlement-oriented and problem-solving mechanism than the Inspection Panel. The other multilateral development banks have since developed their own mechanism, with the African Development Bank still in the process of developing a formal one.

Yet before claims are brought to the attention of any of these high-level panels, the affected people or their representatives must have tried to raise their concerns with organisations' staff or management, giving them an opportunity to address the problems through processes at the operations department or in-country offices. While filing a claim through formalised channels might at times put strain on a complainant's capacity and require expert understanding of the mechanism, challenges of seeking redress through informal mechanisms range from issues of cultural miscommunication to lack of transparency of the process to fear of retaliation and uncertainty that broader learning from the complaint will be fed back into the organisation.

It can be nearly impossible for outsiders to access information about the abuse of power by an organisation or individuals within it if there is a lack of evidence. Thus another critical element of any complaint and response mechanism is the protection of whistleblowers, individuals either inside or outside the organisation who are in a position to provide evidence about abuses of power. Although this area has come under increasing scrutiny in the last couple of years, there is still plenty of work to be done in terms of creating an organisational culture of protection and confidentiality for whistleblowers.

The Government Accountability Project based in Washington, USA, undertook a survey of the whistleblower protection policies at the World Bank, the ABD, the IADB and the EBRD and concluded that the policies of all four of these banks exhibited substantial deficiencies in policies designed to protect whistleblowers.[43] The survey was based on a 24-point check-list which was used to evaluate whether the MDBs' policies are comprehensive in scope; offer the chance for a hearing in an impartial proceeding; provide modern legal standards to adjudicate claims; provide sufficient relief for those who win their cases; and provide the whistleblower with the chance to make a difference in fighting abuses of power if he or she risks retaliation to speak out. While the survey uncovered serious deficiencies at each bank, it is also clear that a number of the MDBs are developing new processes for whistleblower protection as a management tool for increasing efficiency and reducing fraud and waste. As the individual reports for each MDB make clear though, all have considerable work to do in order to ensure that potential whistleblowers feel secure enough to publicly expose fraud, corruption and law breaking and so assist the organisations in saving public funds and in reaching their objectives more effectively.

43 Government Accountability Project (2004)

Citizens around the world have felt alienated by global decisions that have an impact on them but do not represent their needs; their inability to have a meaningful say in these decisions has led to civil society groups questioning the legitimacy of many IGOs. In response to this pressure and in parallel with an increasing acceptance of the argument that ownership and participation are crucial elements for development and poverty reduction, IGOs have sought to expand their engagement with other stakeholders and involve them more closely in the decisions that impact their lives.[44] After all, it is people living in poverty who best understand the reality of poverty: policies and projects formulated without their input are more likely to fail. The World Bank has, in theory at least, embraced this emerging paradigm. Its report, *Voices of the Poor*, puts the testimonies of poor people themselves as central to the issue of poverty and development.[45]

Although there has been an increase in the 'breadth' and 'depth' of stakeholder engagement by IGOs, the sector is a long way being effectively accountable to all its key stakeholders. More institutionalised and formalised engagement with its stakeholders is necessary in order to curb what is currently a rather *ad hoc* and unregulated set of processes.

> To some extent, intergovernmental actors can only be as accountable as their member states want them to be.

To some extent, intergovernmental actors can only be as accountable as their member states want them to be. And in a context where the role of nation states is eroded by new emerging actors, member states often turn IGOs into the wrestling ground for showing their power. Equally, some states may be more willing to transfer power to an IGO if some guarantee is given that the transfer is accompanied by appropriate mechanisms to ensure public accountability.

As IGOs wrestle with the issue of engaging effectively and efficiently with their stakeholders, a key constituency to consider are democratically elected representatives. With the number of nations holding democratic elections steadily increasing, these actors are a key group to involve in decision-making, yet to date most IGOs have effectively ignored them.

NATO has long recognised the importance of parliamentarians in supporting its work. The independent NATO Parliamentary Assembly was formed in 1955 to act as a forum for parliamentarians from the NATO countries to debate issues of common concern and to link them to the organisation itself. The assembly also plays a role in legitimising the organisation as it "acts as a permanent reminder that intergovernmental decisions reached within NATO are ultimately dependent on political endorsement in accordance with the due constitutional process of democratically elected parliaments."[46] Although criticism around the effectiveness and real decision-making power of such structures abounds (in the case of NATO and the EU, for example), this might prove to be one of the areas that, given today's global climate, tomorrow's global citizens want to turn to.

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44 Nye (2001)
45 Narayan (2000)
46 NATO Handbook

6.2 Transnational Corporations (TNCs)

Corporate accountability is a phrase that, until recently, has rarely been used in a meaningful manner, or clearly differentiated from debates on corporate social responsibility (CSR) and corporate citizenship. It is the CSR agenda of the 1990s which has dominated discussion and succeeded in opening business to more public scrutiny. However it is out of the critique of, and dissatisfaction with, CSR that the concept of corporate accountability has started to gain credibility. The well-documented limitations of self regulatory and voluntary approaches, and the lack of systemic and meaningful changes within business has led stakeholders, particularly campaigning groups, to demand more, increasingly calling for greater accountability. However, the understanding of accountability within the corporate sector is still developing: it is used to imply answerability, enforceability, legal approaches and is also used interchangeably with transparency, corporate responsibility and corporate citizenship. The concept of accountability as outlined in the GAP framework moves away from the idea of corporate responsibility as an 'add-on', such as a set of standards to comply with for certain activities, an extra report, or a CSR department. Instead it focuses on having an understanding integrated throughout a business of how the business' activities impacts on its stakeholders, and how these impacts can be taken into account within the business' operations. It involves understanding stakeholders, engaging with them, taking their considerations into account, and ultimately taking decisions that balance the interests of all stakeholders and the company's objectives. It is a way of operating which must be incorporated into the business.

The environment of expectations in which TNCs operate has changed. The definition of stakeholder has become broader and more inclusive as companies' reach and power extends, and new frameworks of expectations and obligations are developing, relating not purely to shareholders, employees and consumers, but expanding to include suppliers, local communities, and NGOs. Increased visibility of activities to stakeholders arising from improved communication technologies and global civil society coalitions have meant that companies face more coordinated action and external pressure to review and increase various aspects of accountability.[47] Government regulators, investors, employees, NGOs, labour unions, community organisations, and the media, as well as international institutions such as the OECD, UN and ILO are making demands on TNCs.

Standards relating to TNCs are not a new phenomenon, with some, such as the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (1977), and the OECD Guidelines for Multinational Enterprises (1961, revised 2000) existing for many years. However, in response to scrutiny and pressure, TNCs are increasingly signing up to external standards and codes of conduct such as the UN Global Compact; self-regulating through voluntary agreements related to particular industries or issues, e.g. International Council on Mining and Metals' Charters, Worldwide Responsible Apparel Production Principles (WRAP); and working in partnerships with NGOs (e.g. Fair Labour Association).

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Transparency

Most of the information that TNCs provide is through their formal reporting activities, much of which is in line with regulatory requirements. This is particularly well developed in relation to financial affairs, where legislation places strong requirements for information availability on publicly listed companies. Recent crises such as Enron and Worldcom have led to increased scrutiny of corporate financial reporting, culminating in the US with the introduction of the Sarbanes-Oxley Act requiring, among other things, certification of internal auditing by external auditors, increased financial disclosure, and imposing criminal and civil penalties for non-compliance violations. Companies are also required to report on corporate governance issues, such as Board processes, ownership structures, remuneration of key executives, and are facing increased pressure to disclose more information.

Increasingly companies are also reporting on their social and environmental impacts. A recent KPMG survey of the top 250 companies of the Fortune 500 indicated that in 2005 52 percent issued separate corporate responsibility reports.[48] This issue was originally pushed onto the agenda by NGOs wanting to hold companies to account for their impact on society and the environment, and is now supported by other stakeholders. For instance, institutional investors argue that non-financial information is important in determining a corporation's long term sustainability, which impacts the value of the company and therefore investment decisions. This is already reflected in the regulation of some countries, such as Australia, Belgium, Denmark, France and the Netherlands, which require reporting on social and environmental issues; and is beginning to be reflected in others', for instance the UK's recent Operating and Financial Review. However, although these reports provide some information on activities and impacts, companies are also widely criticised for being selective in what they report on, and the level of detail they provide, therefore not necessarily enabling stakeholders to gain a full understanding of their activities and impact.

Non-binding initiatives and guidelines also exist at an international level dealing with transparency of business. The OECD Principles of Corporate Governance, introduced in 1999 and updated in 2004, advocate "timely, regular, reliable and relevant information" on "activities, structure, financial situation and performance", and provide additional information on what should be provided. The Global Reporting Initiative's (GRI) Sustainability Reporting Guidelines provide a voluntary international reporting standard for use by organisations reporting on the economic, environmental and social dimensions of their activities, products and services. By May 2005, 660 organisations had referenced GRI in their sustainability reports.

The question of transparency has also arisen in relation to specific issues, generally the subject of campaigns by NGOs for greater corporate responsibility. One such issue is the responsibility of TNCs for their supply chains and sourcing practices, where increased scrutiny from NGOs and consumers demanding higher social and environmental standards has forced companies to provide more information on their activities. For instance concerns with the sustainability of wood sources has led to transparent and documented supply chains certified by bodies such as the Forest Stewardship Council, and many similar examples exist, particularly relating to labour standards, for instance Rugmark, Social Accountability International (SAI), and Fair Labour Association (FLA). Most of these initiatives are run by a third party that sets the standards member

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48 KPMG (2005)

companies must comply with and requires transparency and documentation in order to certify this. Some companies are also taking steps individually to increase transparency within their supply chain; for instance, Nike's recent decision to disclose the names and locations of the more than 700 active contract factories that currently make Nike-branded products worldwide.

Another transparency issue is that of payments to governments. There is a growing pressure on companies in the extractive industries sector in particular to disclose information on payments made to governments, in order to enable citizens of these countries to track how their governments are using money from resource extraction and hopefully through this to counter corruption. Initiatives such as the Extractive Industries Transparency Initiative and Publish What You Pay are progressing this. Recently there has been much attention on lobbying payments, and pressure on companies to be more transparent about how they seek to influence public policy. A growing number of companies such as Johnson & Johnson, Cisco Systems and Bell South now disclose information on political donations, and a recent report found that approximately 50% of major companies are now providing at least some information on their lobbying and public policy activities.[49] There is also increasing interest in tax payments made by TNCs, with groups such as the Tax Justice Network leading on this issue.

In some ways therefore transparency is well developed among TNCs. However companies are far from being open about all activities to all stakeholders. The boundaries of corporate transparency are being challenged by stakeholders wanting access to an increasing amount of information about corporate activities, practices, and decision-making, to which some companies are responding positively, but the general response is in a slow and piecemeal manner.

In addition most companies, despite the multiple information requests they get from consumers, communities, NGOs and investors, do not have formal information disclosure policies. As Tapscott notes, this means that "few think about transparency in a disciplined way or have a strategy for figuring out what should be disclosed, by whom, through what channels, under what conditions, on which media. Beyond old-fashioned public relations spinning, they don't have a comprehensive information strategy."[51] The implications of this are considerable as decisions are being made on an informal basis with too much discretion in the hands of individuals regarding disclosure. To be seen as truly transparent, companies need to begin formalising their information provision with clear rules-based disclosure policies.

Participation

In comparison with transparency, there are fewer clear requirements and less guidance available in terms of stakeholder engagement in decision-making. As a result there is a high variation in the extent to which stakeholder groups participate in TNCs' affairs.

Engagement with internal stakeholders is further advanced than with external stakeholders. Companies engage with their customers through forms of market research; they engage with major institutional shareholders regularly and with all shareholders through formal required mechanisms such as the AGM. Employee participation occurs through engagement with trade

> "corporate transparency today goes well beyond regulations requiring companies to disclose financial information. Transparency means increasing access to information about every facet of corporate behaviour to the full spectrum of corporate stakeholders"[50]

> In comparison with transparency, there are fewer clear requirements and less guidance available in terms of stakeholder engagement in decision-making.

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49   Sustainability (2005)
50   Tapscott (2003)
51   *Ibid*

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unions, and some companies have in place good systems for engaging directly with employees on issues which affect them, as well as for providing information.

Engaging external stakeholders is more problematic. The OECD Principles of Corporate Governance refer to the role of stakeholders and their participation in the corporate governance process, but this mainly refers to participation in line with 'laws and practice of corporate governance systems'. AA1000, established by the Institute of Social and Ethical Accountability in 1999, provides guidance on how an organisation can establish effective stakeholder engagement, and through this, define and improve its accountability.

Similarly to transparency, it appears that the most progress has been made in those areas which have received the most negative publicity in relation to their impacts on either social or environmental issues. Within the clothing and sports goods industries TNCs, particularly those with high profile brands, are engaging with NGOs, and in some cases workers of their suppliers, in response to concerns about workers' conditions. In the extractive industries, in response to campaigns regarding the impact on the environment and local livelihoods, some companies now actively engage with local communities both before and during projects.

An important driver of increased external stakeholder engagement may be the increase in suppliers of project finance requiring participation of stakeholders prior to funding. The Equator Principles for example, which provide a framework for banks to manage social and environmental issues in project financing, set out that an Environmental Assessment must take place and, amongst other things, it must address "participation of affected parties in the design, review and implementation of the project".[52]

A key question for TNCs in terms of external stakeholder engagement is who to engage with and what form engagement should take. Many businesses now engage with NGOs through partnerships and, at times, funding community projects in the areas where they operate is presented as engagement too. While the former raises questions around ensuring NGOs are true representatives of those they claim to represent, the latter has often been criticised as window-dressing. Businesses must ensure that they engage with a full range of stakeholders in a meaningful way – at an appropriate time, with sufficient information – and that they respond to the information gained and the issues raised.

Evaluation

Internal evaluation for critical business functions is well developed within the corporate sector where evaluation takes place against key performance objectives, focused on ensuring that the business runs well and is efficient and successful. Typically evaluation of this type is related to financial performance – turnover, profit, growth, margin – and its key drivers – customer satisfaction, market share, and operational efficiency. Yet businesses are increasingly recognising the need to understand more than just financial factors; tools such as the Balanced Scorecard provide the framework for assessments from four distinct perspectives: financial, customer, business processes, and learning and growth. This type of evaluation is used both to report and judge performance, and to feed information into the business on an ongoing basis to improve performance.

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Evaluation is also driven by regulatory and reporting requirements. Businesses will evaluate to ensure that they are meeting regulatory standards, for instance of emission levels, working hours, etc. Business will also evaluate where there is a call to report on particular issues; for instance, GRI indicators relating to production of waste will also drive evaluation and encourage focus on performance in this area given the need for information. Evaluation will also occur where an organisation commits to certain standards itself, and therefore is measured against these. A business reaction to these issues is demonstrated by Wal-Mart's recent creation of a compliance team to monitor the company's adherence to labour laws and its own corporate diversity goals.

Evaluation, therefore, is already integrated within the core functions of TNCs to a considerable extent, with the joint reporting/learning function of evaluation recognised and utilised. However the focus is internal; the use of evaluations to monitor and drive accountability to, and in collaboration with, external stakeholders is less developed. The AA1000 Process Model identifies the importance of evaluation, and involving stakeholders in evaluation, to increasing accountability. Evaluation and monitoring is a central component of the labour rights standards initiatives in the clothing and sportswear industries (e.g. SAI 8000, FLA), with membership of these requiring a commitment to internal and independent monitoring in relation to standards. Yet examples are few and the use of evaluation to increase accountability to external stakeholders should certainly be explored further.

Complaint and response mechanisms

Complaints processes are recognised in the OECD Principles of Corporate Governance as the right of stakeholders, including employees, to freely communicate concerns about illegal or unethical practices to the Board, without their rights being compromised. Perhaps the most well developed complaint mechanism in TNCs (and certainly the most visible) relates to customer complaints arising from dissatisfaction with products and/or services. Guidelines relating to complaint management are covered in both the ISO 9000 and BSO 8600 standards, and customer complaint systems are generally accessible and effective. Employee complaints mechanisms are also generally well developed in TNCs, in response to legislation and increasing awareness and legal cases relating to discrimination, workers' rights and health and safety. In the US, for example, from 1992 to 2002 monetary settlements for sexual harassment charges filed with the Equal Employment Opportunity Commission jumped from $12 million to $50 million.[53] The evolution of whistleblowing procedures to protect employees who raise complaints of company misconduct are essential, and the requirements of the Sarbanes-Oxley Act with respect to whistleblower rights and protection have been important in progressing this area.

Complaint mechanisms for external stakeholders are less developed. One arena in which they have started to develop is among producers and retailers in clothing and sportswear industries, specifically in response to labour rights issues. These mechanisms enable workers of a supplier, or NGOs/labour activists working on their behalf, to raise a complaint where they either cannot raise the issue with their employer (the supplier), or there is no response to the complaint. In most cases the mechanisms used to deal with these complaints are run by multi-stakeholder initiatives (MSIs) to which the TNC belongs, which have codes of conduct or certification schemes. These organisations include the Workers Rights Consortium (WRC), the Fair Labour Association, the

53 Krotz, (2005)

Ethical Trading Initiative (ETI), Social Accountability International, and the Fair Wear Foundation (FWF). The operational practices of these MSIs vary; in some they encourage complaints to be made to the supplier organisation, in some they file and investigate the complaints themselves, and others ensure that complaints are made directly to the member company. In these cases, the TNC/member company has to develop internal systems to process and follow up on complaints themselves.

Some TNCs have their own internal process for dealing with complaints of this type. However, there is little information available about how these processes work and how effective they are. Some information suggests that internal processes may not be particularly comprehensive, as they often fail to engage the complainant and other workers.[54]

...given the range of their impact, companies need to look at a wider range of stakeholders and make efforts to tackle their needs. There is a need for companies to be more proactive and engaging in all aspects of accountability.

Changes have occurred within the corporate sector which contribute to corporate accountability. In general, the accountability of TNCs to stakeholders critical to the business (customers and shareholders) is quite well developed. However, given the range of their impact, companies need to look at a wider range of stakeholders and make efforts to tackle their needs. There is a need for companies to be more proactive and engaging in all aspects of accountability. Generally business has taken a reactive and reserved approach, but successful accountability requires organisations to proactively engage with stakeholders and feed the learning from this process back into the organisation. There is also a need for a change of mindset, from that of CSR, which is seen as an addition to offset other activities, to an integrated approach and an understanding that accountability is about the way in which business operates and the impact that it has.

54 Ascoly and Zeldenhurst (2003)

6.3 International NGOs (INGOs)

INGOs are operating in a very different political environment to the one that existed a decade ago. Whereas in the past they have been able to claim that good intentions and moral values provided a sufficient basis for accountability, increasingly these claims are being questioned.

The issue of INGO accountability however, is complex. INGOs need to be accountable to multiple sets of stakeholders that each play an integral role in their operations: donors provide the funds, governments the legal legitimacy, supporters provide their money and time, and beneficiaries the purpose and legitimacy. Yet, it would be unrealistic to expect INGOs to be equally accountable to each of these groups. There needs to prioritisation. How an INGO prioritises its stakeholders should be guided by its mission and values. What an INGO has been set up to do and what its long-term strategic objectives are should determine its key stakeholder groups. INGOs need to be most responsive to those individuals and communities integral to the achievement of its organisational mission.

Transparency

With the changing political environment, there is considerable pressure on INGOs to become more transparent. Stakeholders want reliable information on what INGOs' objectives are, how they operate, how they utilise resources in pursuit of their mission and goals and ultimately, what impact they have. To retain the support and the high levels of trust the sector enjoys, greater transparency and openness has become essential.

Financial accounts are one of the most transparent areas of INGO activity. This stems principally from the government regulation that exists in most countries requiring NGOs to disclose annual financial reports. Although this information is often in the public sphere, many organisations fail to make it readily accessible to their stakeholders.[55] This has given rise to sector-led initiatives such as GuideStar which bring together all existing information on NGOs, including their financial accounts, in an easily accessible online database.

One stakeholder group however remains largely in the dark with regards to how INGOs use their financial resources – beneficiaries. Rarely do INGOs ensure that beneficiaries are provided with information on how money is being spent. Annual reports and initiatives such as GuideStar might cater to the informational needs of Northern supporters and institutional donors, but they are largely inappropriate for the communities with which INGOs are working with. To be relevant and accessible to this group, financial information has to be communicated in a very different way.

This is a crucial gap in transparency as ultimately INGOs are spending money in the pursuit of beneficiaries' interests. Providing them with access to information on how it is spent could pave the way for a more effective allocation of scarce resources and improved impact, with beneficiaries making sure expenditure is aligned with priorities.[56] Through their Accountability Learning and Planning (ALPS) initiative, ActionAid International are putting this into practice with numerous national chapters reporting finances to their partners and beneficiaries. ActionAid Kenya, for example, now provide detailed financial information to partners and beneficiaries on

INGOs need to be most responsive to those individuals and communities integral to the achievement of its organisational mission.

55 Kovach et al (2003)
56 UK based charity MANGO have recently started a campaign on this issue

programme and organisational costs, while also publicly displaying a monthly update of expenditure outside its offices.

Another area of INGO activity where there is a need for greater transparency is around evaluations. INGOs currently undertake a multitude of evaluations, yet few organisations make the results of these consistently available. Notable exceptions are in the humanitarian sector, where a concerted effort has been made to ensure the transparency of evaluation results through initiatives such as ALNAP.[57] Having easy access to information on how an organisation is performing is central to stakeholders being able to make informed decisions.

Transparency around governance is also emerging as an important area. INGOs need to be more transparent about how decisions are being made and how stakeholders are being engaged in the development of organisational policy and strategy. Currently, this information is simply not in the public domain. A major question posed by critics of INGOs is about who they represent. Being open about how the organisation is governed and how decisions are made will go a long way to providing effective answers to this. With the transparency of corporate governance structures becoming an increasingly important issue amongst TNCs, it is only time before INGOs are pressed to open up on this issue as well.

There are some clear challenges to the future progress of transparency among INGOs, notable among them is the concern that greater openness could lead to vested interests influencing and ultimately resisting what INGOs do.[58] Although this is a valid concern, it should not prevent transparency taking hold in the sector. If the disclosure of certain information could compromise a key organisational objective it should not be made available. This is clear. However, this should not become grounds for a more wide spread lack of transparency.

INGOs need to be more transparent about how decisions are being made, how resources are allocated, how this relates to their core purposes and how this translates into impact. They are needlessly secretive in this regard. A first port of call should be the establishment of a transparency policy as this would provide guidance to staff and the organisation on what information should be shared, and what stakeholders can expect and have the right to ask for.

Participation

Participation has a long history in the INGO sector: many development INGOs, for example, have been utilising participatory techniques to engage their stakeholders in the decisions that affect them for decades. Reflecting this, INGOs engage stakeholders in a multitude of different ways. Save the Children Fund-UK for example engages disadvantaged children, their primary stakeholder group, by sharing information; through consultations; focus group discussions; involvement in design, implementation and evaluation of projects and programs; peer reviews; participation in staff recruitment processes; and feedback/complaints systems.[59]

However, the problem in most INGOs is that stakeholder participation has rarely been scaled up to the level of policy or strategy; in cases where this did happen, it has rarely been institutionalised,

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57 Slim (2002)
58 Tilt (2005)
59 Stefanoni, S. (2003)

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preventing stakeholders from being able to consistently affect the wider decision-making structures or the broader organisational strategy. This has limited the extent to which INGOs have been accountable to their stakeholders.

Some organisations have been trying to develop mechanisms to address this accountability gap. Oxfam GB, for example, now hold an annual stakeholder assembly that brings together close to 200 internal and external stakeholders to debate and discuss key organisational policy and performance issues, and undertake an annual stakeholder survey to gather views on the organisation's effectiveness. Although the assembly has no formal decision-making power it is attended by those who do – senior managers and trustees – and thus provides a forum where they are exposed to a wide range of views on key policy issues. ActionAid International has developed a similar mechanism as part of ALPS. Their annual participatory review and reflection process brings together key stakeholders, including beneficiaries, partners, donors and peers, to discuss organisational policy and performance at the national, regional and international levels and provide the space for them to "actively influence the organisation's agenda".[60]

Scaling up stakeholder engagement must also be reflected in advocacy work. As INGOs continue to speak on behalf of others, having mechanisms in place that indicate how those they represent participated in and informed the development of a policy position will greatly strengthen their credibility. Moreover, it will also ensure that the positions taken at the international level are reflective of what is most appropriate for beneficiary and other affected groups.

With regards to the participation of national member organisations in the overall governance structures, most INGOs ensure equity in voice and influence. The One World Trust's 2003 report, for example, found that of the six INGOs surveyed, none of the members dominated decision-making because of an unfair distribution of voting rights, with the majority distributing them equally among members. Yet it was noted that in some INGOs, country offices are not considered national members, thus are not represented and have no voice in high-level decision-making processes.

Trying to discern the extent to which an organisation has participatory practices when dealing with its employees is slightly more problematic than identifying how other stakeholders participate in INGO activities; this type of information is rarely in the public domain. One initiative that suggests the issue is on the INGO agenda, at least in relation to matters that concern their employment, is that of People in Aid. This code of conduct of which 73 INGO are members was established to improve the quality of human resource management in the humanitarian sector. One of its seven principles requires that organisations consult with field staff when developing human resource policy and any other matters likely to affect their employment. Although in most countries it is the legal right of employees to input into such decisions, for INGOs operating across borders and often in countries where labour standards are not enforced, signing up to the code highlights an organisation-wide commitment.

There are challenges to stakeholder participation in the INGO sector, notable among them is that engaging stakeholders can slow down the decision-making process. Unfortunately, there are no easy ways of overcoming this inevitable side-effect. Targeted participation and effective engagement techniques can keep this to a minimum. Effectively reflecting the needs of beneficiaries and local

communities in decision-making processes requires strong ties between the INGO and these groups, some of which take time to develop. INGOs working in changing environments – particularly INGOs which work in war-torn societies or in areas affected by humanitarian emergencies – face the biggest challenge of all. It is for this very reason that engagement – and accountability mechanisms in general – need to remain flexible so that they can be adapted to different contexts.

Evaluation

The use of evaluation within the INGO sector is generally well established. Evaluations are a standard stage of any project or programme cycle for the vast majority of organisations. Despite this, the role evaluation has played as a mechanism of accountability has largely been skewed towards meeting the needs of certain stakeholders, donors in particular.

For many INGOs evaluation has traditionally been perceived as a mechanism for ensuring upward accountability to institutional donors. For organisations that work with partners evaluation has also been seen as a means of ensuring the accountability of those partners to the INGO. In both cases it has been used primarily to show that resources are being used effectively and that targets are being met. Although being responsive to donors is important, this has been pursued at the expense of evaluation for organisational learning. In a situation where organisations are principally concerned with upward accountability, there are incentives to downplay failure and exaggerate success. No INGO wants to jeopardise their funding by revealing failures, yet, it is precisely failures and setbacks that provide the best basis for learning.

A number of INGOs are starting to view evaluation in this more strategic light; acknowledging the potential for evaluation to play a more wide ranging role in strengthening organisational accountability. WWF International, for example, have embraced evaluation for learning through the development of an organisational assessment tool which, by engaging internal and external stakeholders allows national level WWF offices to evaluate all aspects of their capacity and develop and implement future strategies to improve effectiveness and performance.[61] ALNAP is another interesting initiative that promotes a culture of learning and accountability among humanitarian INGOs through a more effective and systematic use of evaluations:[62] it monitors the quality of evaluations among humanitarian INGOs and works with agencies to improve their evaluation processes.

Reflecting this shift towards evaluation for learning, a number of development INGOs are also developing organisation-wide performance assessment frameworks to monitor change against organisational objectives. These are of particular interest given their potential of strengthening INGOs' accountability to their mission and, as a result, to the stakeholder groups identified as central to its realisation. SCF-UK, for example, has developed the Global Impact Monitoring process which involves regular impact review sessions at both the country and regional level. This creates the space for stakeholders to reflect on activities, to learn from experience and improve future efforts.[63] These emerging systems are creating space for critical review and reflection among stakeholders, allowing organisations to better understand their performance in

61 Smith & Spark (2003)
62 HAP-I (2005)
63 Starling, Forsti, & Banos Smith (2004)

relation to key objectives and impact at different levels of the organisation.[64]

There are elements intrinsic to the nature of the non-governmental sector that make evaluation difficult. Firstly, the complex and contingent nature of social change: most INGOs work in environments where the relationship between inputs, outputs and impact is complex. The process of change is rarely linear but contingent on multiple interrelated factors that shift as they interact with the problem and each other.[65] This makes drawing causality difficult, especially when the affects of an intervention are drawn out over many years. The manifestation of these problems are particularly acute in advocacy work, where external factors influence outcomes and impact more than anything within the organisation's control. However, given that INGOs are channelling a growing proportion of funds into campaigning work, they need to be able to show what impact this has on achieving their mission.

Unlike corporations, INGOs do not have a single bottom line or a simple measure against which performance can be assessed. Although there are exceptions to this, particularly in service delivery and projects related to provision of water and sanitation which have clear performance standards, the effectiveness of many INGO activities is subject to interpretation and judgement. This highlights the importance of having clearly agreed objectives prior to the start of any project, against which the organisation can assess itself.

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Complaint and response mechanisms

There is comparatively limited information available on the state of complaint and response mechanisms among INGOs, a direct reflection that this is a largely underdeveloped area within the sector. Yet a number of initiatives are emerging.

At the sector level, complaint mechanisms are being developed in accordance with a number of codes of conduct as a means of ensuring compliance.[66] Both the Australian Council for International Development's Code of Conduct for Australian Aid and Development Agencies [67] and InterAction's Private Voluntary Organisation standards for US-based development and humanitarian organisations [68] have systems in place to enable members of the public to file a complaint if they feel a signatory organisation is not meeting the standards set out in the codes. On the other hand, the Humanitarian Accountability Partnership-International (HAP-I) is principally concerned with ensuring that structures are in place for beneficiaries and staff to make complaints. A sector-led initiative established to ensure better accountability to the beneficiaries of humanitarian relief, HAP-I tracks the progress of any complaints made against its members and monitors decisions and actions taken through its secretariat and Standing Complaints Committee (SCC). When necessary, the SCC provides advice and can recommend that membership is suspended or terminated.

At the organisational level, most INGOs have principles and procedures in place for dealing with staff complaints; in most contexts this is required by law. Processes are also generally in place to respond

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64 Roche and Kelly (2003)
65 Edwards & Hulme (2002)
66 Lloyd (2005)
67 The Australian Council for International Development's website
68 InterAction website

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to negative feedback or complaints from institutional donors. Interestingly Christian Aid, a UK based development INGO, is also developing mechanisms for dealing with supporter complaints.

A minority of INGOs is also beginning to develop organisational level mechanisms specifically designed to address complaints from beneficiaries. Save the Children UK, for example, have been experimenting with the use of child feedback committees in Zimbabwe. Following a survey that found the programme's primary stakeholders, children, were unwilling to make complaints either within their community or to agency staff, for fear that food aid might be terminated, SCF-UK established child feedback committees to provide them with a safe forum in which to voice their concerns. These fed directly into hearing committees made up of senior representatives that had the mandate to redirect food aid operations in light of these complaints and provide feedback to children about their concerns. The results so far have been promising with representatives on the hearing committee believing that information is being gathered that would not have surfaced through normal post-monitoring visits.[69]

There are a few notable challenges to the future development of complaint mechanisms among INGOs. For those organisations working with the poor and marginalised, for example, a key challenge is how to put in place a structure that stakeholder feel safe to use without fear of victimisation or loss of services. Another challenge is how can such initiatives be scaled up from the operational level to the level of strategic policy? Can mechanisms be developed that could enable beneficiaries to lodge a formal complaint against the policy position of an INGO?

Establishing complaint mechanisms for stakeholders is an area of accountability that has not received sufficient attention from INGOs. Although donors, staff and supporters may have channels through which to voice concern, beneficiaries and partners often do not. If an issue cannot be resolved at a lower level, too few organisations have mechanisms that enable the complaints to be heard at a higher level. Few organisations have clear mechanisms in place that allow partners to question or make a complaint against INGO staff, for example, or that allow beneficiaries to file complaints or raise issues with INGOs about how partners are using resources. In theory, if an organisation has been transparent, engaged its stakeholders in decision-making and incorporated back into the organisation the learning from evaluation, there should be no need for complaint mechanisms; they are a safeguard and, having them in place reflects a true commitment to accountability.

> Establishing complaint mechanisms for stakeholders is an area of accountability that has not received sufficient attention from INGOs.

In summary, INGOs are institutionalising a variety of mechanisms across the four dimensions to increase their accountability. However, the key problem remains for most INGOs that their accountability systems are skewed towards those stakeholders with the most power and influence. In order for organisations to reap the benefits of accountability in terms of both increased effectiveness and learning this needs to change. To create an accountability that better supports their mission and vision, INGOs need to start developing mechanisms and processes that provide stakeholders, such as their beneficiaries, with a greater voice in how decisions are made.

...the key problem remains for most INGOs that their accountability systems are skewed towards those stake-holders with the most power and influence.

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Activities

This publication was informed by discussions held during a series of events organised by the One World Trust, which are listed below.

Unless indicated otherwise, all events took place in London, UK. They are listed in reverse chronological order. Organisational affiliation relates to the date of the event.

The publication does not represent the views of individuals who attended the events and is based on the authors' own interpretation and conclusions.

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The events below were hosted by the One World Trust specifically to inform the development of the GAP guidelines:

Increasing Accountability through Evaluation (Online Discussion Forum)
4-17 May 2005

171 participants from 25 countries and from sectors including not for profit, public, business and academia registered for the forum.

Increasing Accountability through Complaint and Redress Mechanisms (Workshop)
14-15 October 2004, Bangkok, Thailand

Facilitator:	Lindsey Colbourne
Coordinators:	Monica Blagescu and Lucy de Las Casas (One World Trust)

List of Participants:

William Anderson	*adidas-Salomon, Hong Kong*
Sandeep Chachra	*ActionAid Asia, India*
Tom Devine	*Government Accountability Project, US*
Meggan Dissly	*Organisation for Economic Co-operation and Development, France*
Toshiyuki Doi	*Mekong Watch, Thailand*
Nestor Gabot	*Manila Water Company, The Philippines*
Bushra Gohar	*Human Resources Management and Development Centre, Pakistan*
Fely Imperial Soledad	*Philippine Council for NGO Certification, The Philippines*
Jagadananda	*Centre for Youth and Social Development, India*
David Kalete	*CIVICUS, South Africa*
Ingrid Macdonald	*Oxfam Community Aid Abroad, Australia*
Pallavi Mansingh	*Centre for Education and Communication, India*
Lee Marler	*European Bank for Reconstruction and Development, UK*
Anant Nadkarni	*Tata, India*
Suresh Nanwani	*Asian Development Bank, The Philippines*
Tongroj Onchan	*World Bank Inspection Panel, Thailand*
Ranjan Rao Yerdoor	*Credibility Alliance, India*
Perry Rivera	*Manila Water Company, The Philippines*
Ding Roco	*Shell Philippines Exploration B.V., The Phillipines*
Mustafa Talpur	*ActionAid, Pakistan*
Meg Taylor	*International Finance Corporation and the Multilateral Investment Guarantee Agency Office of the Compliance Advisor/Ombudsman, US*

Increasing Accountability through External Stakeholder Engagement (Workshop)

23-24 October 2003

Lead Facilitator: Lindsey Colbourne

Coordinators: Monica Blagescu and Caroline Neligan (One World Trust)

List of Participants and Contributors:

Andrew Acland	*Dialogue by Design, UK*
Stella Amadi	*Legal Practitioner, Nigeria*
Jem Bendell	*UN Research Institute for Social Development, Switzerland*
Mihir R. Bhatt	*Disaster Mitigation Institute, India*
Kent Buse	*London School of Hygiene and Tropical Medicine, UK*
Ken Caplan	*Building Partnerships for Development, UK*
Jonathan Cohen	*AccountAbility, UK*
Bill M. Cooke	*Manchester School of Management (UMIST), UK*
Meggan Dissly	*Organisation for Economic Co-operation and Development, France*
Charlotte Dufour	*Groupe URD, France*
Charles Freeland	*Basel Committee on Banking Supervision (BIS), Switzerland*
Bushra Gohar	*Human Resources Management and Development Centre, Pakistan*
Fiona Gooch	*TraidCraft, UK*
François Grunewald	*Groupe URD, France*
Minu Hemmati	*Independent Consultant, Germany*
Allan Hogarth	*Amnesty International, UK*
Jeremy Holland	*University of Swansea, UK*
Mosharraf Hossain	*Action on Disability and Development, Bangladesh*
Jagadananda	*Centre for Youth and Social Development, India*
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Nyang'ori Ohenjo	*Centre for Minority Rights Development, Kenya*
Charles Owusu	*ActionAid, UK*
Hilary Parsons	*Nestle, UK*
Deborah Seamark	*CSR Network, UK*
Veena Siddharth	*World Bank, US*
Oliver Smith	*WWF-UK*
Peter Spark	*Ecsponent, UK*
Silvia Stefanoni	*Save the Children, UK*
Fletcher Tembo	*World Vision, UK*
Orlando G. Ubilla	*Fundacion Horizontes, Bolivia*
Alex Wilks	*Bretton Woods Project, UK*
Jan Martin Witte	*Global Public Policy Institute, Germany*
Ian Wylie	*Rio Tinto, UK*

The following events were part of the wider work of the One World Trust and the Accountability Programme, but informed the development of the GAP Framework:

Accountability and Stakeholder Engagement: Experiences from the Corporate and Non-Profit Sectors

16 December 2004

Chair: Lord Newby, *Liberal Democrat Spokesperson for the Treasury*

Speakers: Barbara Stocking, *Oxfam*
Sir Mark Moody-Stuart, *Anglo American plc*
Simon Zadek, *AccountAbility*

Confronting the Challenge: Developing Approaches and Alliances for Increasing Civil Society Legitimacy, Transparency and Accountability

11-13 October 2004, Bangkok, Thailand

The workshop, jointly organised by the One World Trust, ActionAid Asia and CIVICUS, brought together 27 representatives of civil society organisations to share experiences on, and find practical approaches to, improving accountability.

Increasing Organisational Accountability Workshop

22 March 2004, at the CIVICUS World Assembly in Gaborone, Botswana

Coordinators: Monica Blagescu and Caroline Neligan, *One World Trust*
David Bonbright, *ACCESS (currently Keystone)*

Developing Norms for Global Accountability Seminar

26 February 2003

Speakers: Hetty Kovach, *One World Trust*
Anthony McGrew, *Southampton University*

Facilitators: David Held, *LSE* and Martyn Bond, *Federal Trust*

In the UK NGO Accountability Forum series:

What Information Counts

01 April 2005

Speaker: Erica Roberts, *Guidestar UK*

What Makes a Good Partnership?

11 March 2005

Speaker: Ken Caplan, *Building Partnerships for Development*

How to Deal with Complaints

14 January 2005

Speaker: Nick Stockton, *HAP International*

How to Evaluate Project Effectiveness

02 December 2004

Speaker: Todd Landman, University of Essex

Making Stakeholder Engagement Work

22 October 2004

Speaker: Silvia Stefanoni, Save the Children UK

Towards an NGO Reporting Standard?

27 February 2004

Speakers: David Bonbright, *ACCESS (currently Keystone)*
                     Paul Burke, *The Smart Company*

NGO Accountability

26 September 2003

Speakers: Malini Mehra, *UN Civil Society Panel member*
                     Tom Allen, *Bond*
                     Sally Cooke and Belinda Pratten, *NCVO*
                     Nick Aldridge, *ACEVO*

NGO accountability: threat or opportunity?

24 July 2003

Facilitator: Simon Burall, One World Trust

One World Trust Papers

Other One World Trust papers on topics related to the content of this publication.
These are all available from the One World Trust website:

The GAP Framework

- *Power without Accountability?* Hetty Kovach, Caroline Neligan, Simon Burall, 2003.

- *What Makes Global Organisations Accountable? Reassessing the Global Accountability Framework,* Monica Blagescu, 2005.

- *Foundations of the Framework: the GAP Dimension Papers,* Monica Blagescu, Lucy de Las Casas, Robert Lloyd, 2005.

Transparency

- *Transparency in International Organisations: Background Research for the Transparency Dimension,* Robert Lloyd, 2005.

Participation

- *Increasing Accountability through External Stakeholder Engagement: Background Paper,* Caroline Neligan, 2003.

- *An Overview of International Organisations and Their External Stakeholder Engagement,* Caroline Neligan, Monica Blagescu, Hetty Kovach, 2003.

- *External Stakeholder Engagement: A Collection of Case Studies,* Monica Blagescu, 2003.

- *Increasing Accountability through External Stakeholder Engagement: Workshop Report,* Lindsey Colbourne, 2003.

Evaluation

- *Evaluation in International Organisations: Background Research for the Evaluation Dimension,* Monica Blagescu, Lucy de Las Casas, Robert Lloyd, 2005.

- *Increasing Accountability through Evaluation: Report of the Online Forum,* Lucy de Las Casas, 2005.

Complaint and Response Mechanisms

- *Complaint and Redress Mechanisms in International Organisations: Background Research for the Complaint and Redress Dimension*, Lucy de Las Casas, 2005.

- *Increasing Accountability through Complaint and Redress Mechanisms: Workshop Report,* Lindsey Colbourne, 2004.

Other Publications on Accountability

- *The role of NGO Self-regulation in increasing stakeholder accountability,* Robert Lloyd, 2005.

- *A Rich Men's Club: Making the G8 More Accountable,* Robert Lloyd and Claire Wren, 2005.

- *Global Media Reform and Accountability; Report from the National Media Reform Conference,* Lucy de Las Casas, 2005.

- *Accountability of the proposed Peacebuilding Commission – some comments,* Claire Wren, 2005.

- *Outputs from the NGO Forum: Discussions on accountability in the NGO sector.*

- *Accountability in Action: Comment and updates from the Accountability Programme.*

About the authors

Monica Blagescu manages the Accountability Programme of the One World Trust. Prior to moving to the UK, Monica worked in the UNHCR Regional Centre for Emergency Training in International Humanitarian Response (Asia & Pacific) and, before that, in the Peace and Governance Programme at the United Nations University (UNU). She was involved in the World Governance Assessment (UNU/UNDP), the research and training series conflict prevention capacity building (UNU/IDRC), the International Association of Peacekeeping Training Centres, and a project on the role of the military in post-conflict peacebuilding funded by the Japanese and German Foreign Ministries. She holds an MA in International Relations and is currently completing a PhD on good governance of the police sector in post-conflict societies.

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'Nike, Patagonia, GAP, and five other companies have joined forces with six leading anti-sweatshop groups to devise a single set of labour standards with a common factory-inspection system'.

The World Bank has established a committee to develop deeper and more meaningful opportunities for civil society to engage with its operations, policies and governance structures.

WWF Environmental report: *Practicing what we preach - our environmental impact 2003/2004.*

In 2001 BP committed to publish financial data on Angola. With disclosure of this data, BP set a new standard of fiscal transparency for oil companies in Angola.

UN Office of Internal Oversight Services issues more than 1,500 recommendations annually to improve organisational efficiency and effectiveness. The overall implementation rate of these after three years is nearly 90%.

Under its 2002 information disclosure policy the World Bank makes operational information available to the public, ranging from project and policy documents to strategy and evaluation documents.

Gap Inc social responsibility report details, with 'unflinching honesty', the problems the retailer found in the 3,000 factories it contracted to produce clothing.

Action Aid International involves beneficiaries in the evaluation and planning of all their programmes and in the recruitment of front line workers.

Five US INGOs set new standards in accountability by having child sponsorship programmes certified by private third party agency.

All of the multilateral development banks are either developing or already have in place complaint mechanisms for project-affected people.

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