

Independent Accountability Committee

Third report to the General Council

October 2018

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I. Introduction

The Independent Accountability Committee (IAC) here presents its report for 2018. For the benefit of newer participants, a note on who we are, where we sit in the structure of CPDE, and how we work is attached as Appendix 1.

II. What we have done

II.1 Policy on accountability and transparency

In our 2016 report, we recommended that *“CPDE should, as a matter of urgency, develop and agree a Transparency and Accountability Policy in accordance with its own guidelines contained in the toolkit (between pages 46 to 53), to implement the 5th Istanbul principle”* We repeated this recommendation in our 2017 report.

We are very pleased to see that this policy has been drafted, and is being presented to the General Council for its endorsement.

We have reviewed the policy. We consider it to be generally to a high standard, and should be a sound framework for all future work. We have some suggestions on ways in which it could be further improved, and have raised these with the Coordinating Committee. A copy of our comments is attached as Appendix 2.

Although the policy has not yet been endorsed by the GC, we have used it as the basis for our assessments in this report.

II.2 Web site

The web site remains, for us, the gateway for demonstrating transparency and openness of CPDE.

We said, in our report last year, *“We would stress the need for the content of the web site to be reviewed, to recognise the interests of external enquirers and to ensure that it meets the guidance of Istanbul Principle 5.”*

Plainly, much work has been put into revising the web site during the past year, and we consider the overall style and layout much improved. We also recognise that work is still in progress. However, at the time of writing, we have seen a number of serious deficiencies: most notably, we have found no reports of activities of constituencies, no overall report to the public for any previous year, and no audited financial reports of CPDE. As identified in the draft policy on

transparency and accountability, these are essential documents to demonstrate accountability, and should be made available as soon as is possible.

We had drafted a revised section on the work of the IAC during the year, and offered it to the Global Secretariat. However, it is not yet available on the web site, and the information there remains out-of-date.

II.3 Financial procedures

In 2016, we reviewed a number of documents relating to the financial arrangements in place for CPDE. We had raised questions with the co-chairs relating to the ownership of these documents: in particular, on the need for these procedures to be approved or endorsed by appropriate bodies within CPDE. We have still not yet received a response. It remains unclear whether financial arrangements have been approved by CPDE.

II.4 Annual financial report

At the date of this report we had not yet seen the report for 2017.

II.5 Case studies

We decided to make one new case study, relating to accountability of work done in 2017 in the Feminist sector.

As we had found with our previous case studies, we struggled to find documentation, either from CPDE, or the sector, to enable us to review the work in detail.

The general lessons from the case study are the need to improve:

- Public access to sufficient and appropriate information about budget, work plans, and work actually done, achievements and evaluations.
- Spaces, mechanisms and opportunities for different stakeholders to engage with the actors involved in specific sectors and regions.
- Clear and published rules and guides for the exercise of roles and responsibilities at regional and sectorial level

These are matters that should be addressed by application of the policy

Our report on the case study is attached as Appendix 3.

III. What we have found overall

Here, we summarise our overall view, based on our work this year.

III.1 External

Accountability and transparency outwards – to the CPDE members and actors, as well as to the wider civil society not directly engaged in CPDE activities, and to the general public – is improving. The web site has had substantial modification and improvement, in line with our previous recommendations. It is clearer to an interested but uninformed viewer just what CPDE does. However, what CPDE has achieved is less clear.

However, unlike in previous years, we can offer no opinion on accountability and transparency upwards – to the donors. We have seen neither the Annual audited accounts, nor a report to the public, for 2017.

III.2 Internal

The development of a Transparency and Accountability Policy is a major step forward. This should be an effective framework for encouraging inclusivity and sharing of information among members. As we have found, from this and previous case studies, the challenge is now to put the policy into practice.

IV. What we recommend

This year, we make three broad recommendations:

1. To ensure that timely reports are provided to external stakeholders and the general public; and
2. To apply the framework of the Transparency and Accountability policy as soon as is practicable, to ensure that there is effective engagement of members
3. To make sure that the web site is an effective mechanism for supporting the policy, in line with the proposed methodology included with it.

Jake Bharier
Charlie Martial Ngounou
Rosa Inés Ospina-Robledo

10 October 2018.

IV. Appendix 1: Introduction to the IAC

The Independent Accountability Committee (IAC) of the CSO Partnership for Development Effectiveness (CPDE) was established to serve as a strategic Board of Reference to the governance structures of CPDE: to the Global Council (GC), the Coordinating Committee (CC) and to the Co-chairs. The IAC provides help and assistance to the governance structures and to the global secretariat to ensure that CPDE meets and maintains high standards of transparency, accountability and integrity, in line with the Istanbul principles.

The members of the IAC are:

- Charlie Martial Ngounou, based in Yaoundé, Cameroon. Cameroon Representative of the International Association of French Speaking Mayors for fiscal transparency, and founder of AfroLeadership, a CSO promoting Open Data for accountability, transparency and citizen participation;
- Jake Bharier, based in Hereford, UK. Formerly Treasurer of CONCORD, and chair of the Consortium which managed the predecessor of CPDE; and
- Rosa Inés Ospina-Robledo, Based in Bogotá, Colombia. Member of Transparency International and co-chair of the Latin America Regional Initiative for CSO's Transparency and Accountability, based in Bogotá. Activist with the Open Forum.

In accordance with the transitional arrangements in our terms of reference, one member, Charlie Martial Ngounou, came to the end of his first term of office in 2017, and was reappointed for a second term by the Coordinating Committee.

Jake Bharier has continued to act as our convenor. This is our third report to the GC.

V. Ways of working

Much of our work comprises reviews of documents. We have supplemented this with informal Skype meetings about once a month.

A budget has been allocated by the CC for our work. Our costs within CPDE are reported under the heading "Platform coordination and programme management".

VI. Appendix 2: Draft Transparency and Accountability policy

Comments from the IAC to the Coordinating Committee

Note to the Coordinating Committee

Draft Transparency and Accountability Policy Comments from the IAC

We were very pleased to see the draft policy on transparency and accountability (version 21 June 2018) that is to be presented for endorsement to the Global Council in October. We think this is a significant step forward.

We consider the policy to be generally to a high standard, and it should be a sound framework for all future work. However, we would like to contribute some comments and some suggestions, from our experience and knowledge of the topic, that could improve it further. These are tabled below.

Our comments are on an English text read by native speakers of English, French and Spanish, who each may interpret some words differently.

Page	Current text	IAC comment
	Overall	Most policy documents would identify where responsibility lies for promotion of the policy, implementation, monitoring and evaluation it, We think it would be helpful to include such information in this document.
1	Members may use this document as basis for developing their own policy, as applicable to their context	We see this as valuable progress.
2	Transparency for CPDE is the sharing of relevant, reliable and timely information in an open manner, including its constitutional documents,	<ol style="list-style-type: none"> 1. We suggest ... “the active sharing of....” 2. We suggest “.... Sharing of sufficient, relevant” The level of sufficiency

	<p>its major activities, its performance, its financial position, and governance procedures, in ways that are accessible to all interested people. While endeavouring to be transparent as a platform, CPDE will also ensure measures to protect rights to privacy and personal data from misuse.</p>	<p>would always be a matter for the recipient of the information. It may therefore be useful to consider an Open Data approach in due course.</p> <p>3. We suggest: “While CPDE will be open in its approach, we will also ensure measures to protect rights to privacy and personal data from misuse.”</p>
2	<ul style="list-style-type: none"> • The reliability, quality, positive impacts and accessibility of its practice 	<p>What about negative impacts? More generally, given that in development cooperation we aim to “do no harm”, how could CPDE use this policy to encourage learning from, say, failures or misdeeds?</p>
2	<ul style="list-style-type: none"> • That management bodies make visible the technical and financial resources that they use in order to achieve their goals; 	<p>Is this intended to cover management bodies at all levels within CPDE? Does it include the management bodies of member organisations? It may be useful to clarify this.</p>
2	<p>The methodologies and instruments that the CPDE adopts form part of the policy (appended in Annex A). CPDE aims at a public, independent, voluntary and responsible process. By providing real, organised and useful information, CPDE gives annual visibility to the impact and progress of the operations as an organisation that contributes to development effectiveness.</p>	<p>We certainly would not advocate disorganised information. However, we think that “organised” could be misunderstood or misrepresented as “edited” “restricted” – or worse. We suggest “collated”.</p>

5	To enable understanding of the organisations policy positions and current activities, CPDE members and the public will be able to effectively access, in a timely fashion, relevant documentation in key areas, but not limited to the following:	Although it is stated that the list of documents is not exhaustive, would it be appropriate to include a few more specifics? These could be: <ul style="list-style-type: none"> • overall budget • sector work plans, budgets and reports • internal and external reviews and evaluations • reports of the IAC
7	Accountability in Governance is achieved through:	We suggest adding a point at the beginning of the list, along the lines of: <ul style="list-style-type: none"> • Developing, and approving at appropriate levels, mandates, policies, protocols and procedures for governance processes;

IAC
31 August 2018

VII. Appendix 3: Terms of reference for the case studies

September 6-2016 - Version 2

As established in the IAC Terms of Reference approved by the CC, this body *provides help and assistance to the governance structures to ensure that CPDE meets and maintains high standards of transparency, accountability and integrity.*

Compliance with Istanbul Principle 5 demands to promote trust among both external stakeholders such as the communities working with CSOs, other CSOs, governments or donors; and internal stakeholders - the participants within the CPDE processes. Trust is an essential requirement to enable learning and improvement to take place.

The IAC will therefore review the definitions, processes, programmes of work and procedures of CPDE that would support the development of transparency, accountability and integrity and make recommendations for improvement to the CC and Co-chairs; in particular should look at:

- *The provision of information among participants;*
- *The provision of information to the wider public;*
- *Financial accountability systems to both external bodies and to participants;*
- *Policies relating to conflict of interest, and other pertinent policies;*
- *Evaluation systems for programmes of work;*
- *Systems for feedback and interaction with different publics - stakeholders*

In order for the IAC to understand how the CPDE is complying with these principles, in such a complex structure, the IAC has decided to undertake experimental case studies in two sub-regions in order to see if the above criteria are met. For this purpose the IAC has selected **Central America and the Caribbean** sub-region and **Central Africa** sub-region.

The idea is to review the sources provided for the case studies, to see that they provide appropriate and useful information to different stakeholders about these **criteria**:

- The work plan, to be consistent with the purpose of CPDE
- The scale of work planned
- Compliance with the work plan
- The effectiveness of the work done
- The financial efficiency of the work done
- The accessibility of the information related to the case
- The effective spaces or mechanisms for feedback among different actors involve in the activities
- The learning offered to other parts of CPDE

The **sources** of information to be reviewed:

1. Annual Budget
2. Annual Report
3. Interview with the person in charge of one country in the sub-region and the person in charge of the sub-region.
4. CPDE Web Site
5. Information provided by the Global Secretariat.

The **final report** should be succinct, highlighting the:

- (i) Actual time frame for the assessment
- (ii) Specific sources used
- (iii) Findings vis-a-vis the criteria, and
- (iv) Recommendations for improving the accountability of the CPDE.

VIII. Appendix 4: Case study on the Feminist Sector

CASE STUDY: ACCOUNTABILITY PRACTICES OF THE FEMINIST SECTOR WITHIN CPDE 2017

PREPARED BY THE INDEPENDENT ACCOUNTABILITY COMMITTEE

Background

Each year the Independent Accountability Committee (IAC) makes a case study of one or two sectors as part of its assessment of the CPDE accountability performance for the fiscal year. For 2017 we decided to review the Feminist Sector.

The terms of reference we applied to this work are the same as we have used in previous years and are attached as appendix 1. In particular our case study looked at the clarity and sufficiency of the information provided at all levels and to all likely readers interested in women and feminist advances coming from this specialised working sector of CPDE.

The review was carried out between April and June 2018. Rosa Inés Ospina (also a feminist) was the IAC member leading this case study, supported by an external web site reader familiar with CPDE.

The reviewers examined the CPDE web site for information available regarding the feminist sector for the year 2016; asked the General Secretariat for specific information regarding the group's accountability and studied the formal documents provided; Rosa Inés spoke personally or through e-mail exchanges with the CPDE co-chair and outgoing Global Coordinator of the Feminist Group¹; due to the limited information obtained by this we again asked the Global Secretariat for all the specific information they had about the Feminist Sector and reviewed the papers received since 2014; and finally, went back to the CPDE web site looking for improvements on the information provided in this topic.

In this report we present:

¹ Between April and June 2018 Rosa Inés had some e-mail exchanges with Monica Novillo (co-chair and outgoing global coordinator of the feminist platform) and on April 9 they had 30 minutes Skype conversation. When contacted Monica Novillo explained that the new global coordinator was Priti Darooka from India. We wrote to Priti twice asking for an interview but received no answer. In June Rosa Inés learnt from Monica that Priti had resigned from the global coordination position. The resignation had been accepted by the feminist platform, which had not, at that time, elected a replacement. This might explain the lack of response from Priti.

- (1) a summary of general findings
- (2) a summary of specific findings in the Feminist Sector

1. Summary of General Findings

- it is clear that different CPDE actors are now more aware of the need to pay more attention to their accountability performance, and are trying to improve it using different avenues.
- This case study, carried out about eighteen months after the first recommendations of IAC were published, confirms the conclusions reached by the IAC through its previous case studies and reinforces the need for a faster and more efficient way of improving the CPDE accountability practices according to the work plan shared with the IAC. However, we recognise that the changes proposed by the CC to improve accountability practices within the CPDE take time to be implemented.
- For CPDE actors, and for the general public, the web site seems to be the only easy and effective means of obtaining updated and sufficient information about what the CPDE offers, does and achieves. This case study shows that the web site, even with its improvements, is still far from being reliable and sufficient, especially in relation to specific topics and areas of work.
- There are still no clear mechanisms for CPDE general stakeholders to engage with different CPDE governance or administrative bodies in order to interact and to share the decision-making processes: *dynamic accountability*.
- There are few rules that would help to guide the internal governance processes of bodies at regional, local or sectorial processes. The methods for election of the different representatives, how and when to report to their particular constituencies, how to solve unplanned outcomes, and so on do not exist or may be inconsistent.
- Due to the shortcomings of previous accountability policies, we find now that particular sectors or regions have not reported adequately on what they had really done, what they had achieved, and how they had managed their budgets. Information is therefore not available to enable the CPDE actors and the general public to follow them and to understand the failures, achievements and lessons learned.

2. Summary of specific findings in the Feminist Sector

- We have not found formal information available to enable us to assess accountability in and from the Feminist Sector (FS). The web site does not have specific or sufficient information about the FS. The documentation provided by the Global Secretariat speaks only about the

budget allocated, the activities planned and sometimes the list of activities done, and even this limited information is not yet public. We found no other source of information, such as reports on how the activities were developed, what was achieved, the results obtained, or what lessons were learned.

- In this regard, in common with other sectors, there is no particular sub page or space in the CPDE site for the FS to learn about who they are, what they seek, what they do or what do they achieve. *We have seen that the web site is being improved, so we expect to find this important gap for all sectors filled.*
- Even more concerning is the lack of information available in the Global Secretariat for it to review how the resources are expended and what results are achieved. Here are some examples of poor quality information:

Document received	Comment
2014 CPDE Feminist Group Finance Report	Mainly reports that the resources were for workshops in 2014
2015 CPDE End of year reporting – Submitted by <i>Coordinadora de la Mujer de Bolivia</i>	<p>This report mainly registers the activities to be financed, such as:</p> <ul style="list-style-type: none"> • Publication of FG Key Demands on Development Effectiveness • Publication/translation of Engagement and Advocacy Guide • FG Engagement and Advocacy Guide • Side Event on CSW • Global Strategic Planning and Coordination Meeting <p>At the time of the report most of these activities were still due to be carried out. We do not know from the reports if they were done. The exception is the participation at the HL parallel event and the publication of a particular paper</p> <p>.</p>
2016 CPDE End of the Year Report – Submitted by <i>Coordinadora de la Mujer de Bolivia</i>	<p>This report lists the activities undertaken:</p> <ul style="list-style-type: none"> • Workshops to develop the Advocacy guide • Publication of the Advocacy Guide • Dissemination of different opinions coming from the FS engagement • Side Event CSW61 <p>The report only states that the activities planned the previous year were done: there is no substantive report on them.</p>

Progress of Programme Implementation (no date)	The achievement report refers to a meeting that was held and the construction of a set of key questions used to disseminate the work in different spaces
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- When asked about how information is circulated to the FS members, Monica said that they have no formal mechanism other than communicating through the regional FS coordinators. At present there is no formal and updated global list of feminist groups linked to the CPDE work. At global level the FS has only the list of the platform or network contacts in regions. So the scope of the FS constituency is unknown.
- Monica also said that they do not have agreed guidelines or criteria (internal by-laws) to exercise their internal governance. They do not have rules to decide who becomes a member, or how to elect the representatives, or what to do when someone resigns from her position.
- When asked about how stakeholders could understand the focus of the work done by the FS, Monica recognised that due to the lack of shared information it is difficult to know if there is a gap between the agenda undertaken by the regional coordinators and that of the CPDE. The FS work seems to be spread by regions with no clear global plan: it seems that the Global Secretariat proposes an allocation of resources and the regional coordinators decide what to do with it.
- Although the feminist agenda should be a transversal issue within the CPDE, there is no information to see if this is so. No one has been accountable for that.
- Finally, we acknowledge that as Monica has told us during the case study, *the FS regional coordinators are working on a Strategic Plan that should be ready in the second semester of 2018 but without much participation of the feminist movement as such. This plan seeks to face and overcome the problems previously identified, looking for more structured and at the same time agile ways of functioning as a group.*

General Conclusion

Building on our previous findings and recommendations the IAC would expect to see most of the deficiencies about accountability by sectors tackled by the end of the year. We speak about:

- Public access to sufficient and appropriate information about budget, work plans, and work actually done, achievements and evaluations.
- Spaces, mechanisms and opportunities for different stakeholders to engage with the actors involved in specific sectors and regions.

- Clear and published rules and guides for the exercise of roles and responsibilities at regional and sectorial level

The new Accountability Policy, the improved CPDE web site and particular Sector or Region Strategic Plans, should be good mechanisms for improving accountability at sectorial and regional level.